220 Park Road Project

Initial Study

City of Burlingame

NOVEMBER
2020

220 PARK ROAD PROJECT
INITIAL STUDY

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Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADT	average daily traffic
AQAP	Air Quality Attainment Plan
ASTM	American Society for Testing and Materials
BAAQMD	Bay Area Air Quality Management District
Basin Plan	San Francisco Bay Basin Plan
bgs	below the ground surface
BMPs	best management practices
BPD	Burlingame Police Department
BSD	Burlingame School District
CAA	Clean Air Act
CAAQS	California ambient air quality standards
Cal/OSHA	California Division of Occupational Safety and Health
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCE	community-choice energy
CCFD	Central County Fire Department
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_4	methane
City	City of Burlingame
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
covenant	preservation covenant
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
dB	decibel

dBA	A-weighted decibel
DHS	California Department of Health Care Services
DOT	U.S. Department of Transportation
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	U.S. Environmental Protection Agency
ESLs	Environmental Screening Levels
Farmland	Prime Farmland, Unique Farmland, or Farmland of Statewide Importance
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FTA	Federal Transit Administration
General Plan or 2040 General Plan	Envision Burlingame General Plan
GHG	greenhouse gas
GIS	geographic information system
gpd	gallons per day
gsf	gross square feet
GWP	global warming potential
HCP	habitat conservation plan
HFCs	hydroflourocarbons
HMU	Howard Avenue Mixed Use
HRA	health risk assessment
HVAC	heating, ventilation, and air-conditioning
IPaC	Information for Planning and Consultation
IPCC	Intergovernmental Panel on Climate Change
IS/MND	initial study/mitigated negative declaration
JPA	Joint Powers Authority
LEED	Leadership in Energy and Environment Design
L_{eq}	equivalent sound level
LID	low-impact development
mg/m^3	milligrams per cubic meter
mgd	million gallons per day
MRP	Municipal Regional Permit
MRZ	Mineral Resource Zone
msl	mean sea level
MTC	Metropolitan Transportation Commission
N_2O	nitrous oxide
N_2O	nitrous oxide
NAAQS	national ambient air quality standards

NAHC	Native American Heritage Commission
NCCP	natural community conservation plan
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	ozone
OSHA	Occupational Safety and Health Administration
PCE	Peninsula Clean Energy
PG&E	Pacific Gas & Electric
Phase I ESA	Phase I Environmental Site Assessment
PM10	particulate matter no more than 10 microns in diameter
PM2.5	particulate matter no more than 2.5 microns in diameter
Post Office building	United States Post Office building
ppm	parts per million
PPV	peak particle velocity
Previous CEQA Documents	Burlingame Downtown Specific Plan and Envision Burlingame General Plan
Project	200 Park Road Project
PWA	Public Works Administration
RCRA	Resource Conservation and Recovery Act of 1976
RECs	recognized environmental conditions
Register	Burlingame Historic Resources Register
RTP/SCS	regional transportation plan/sustainable communities strategy
RWQCB	Regional Quality Control Water Board
RWS	Regional Water System
SB	Senate Bill
SCAs	Standard Conditions of Approval
Secretary's Standards	Secretary of the Interior's for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings
sf	square feet
SFBAAB	San Francisco Bay Area Air Basin
SFPUC	San Francisco Public Utilities Commission
SIL	significant impact level
SIP	State Implementation Plan
SMCWPPP	San Mateo Countywide Pollution Prevention Program
SMUHSD	San Mateo Union High School District
SO_2	sulfur dioxide
Specific Plan	Burlingame Downtown Specific Plan

SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TDM	transportation demand management
TIA	transportation impact analysis
TPA	Transit Priority Area
TPH	total petroleum hydrocarbons
TSCA	Toxic Substances Control Act
U.S.	United States
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
USPS	U.S. Postal Service
UST	underground storage tank
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOCs	volatile organic compounds
WWTP	wastewater treatment plant

Chapter 1
Background

1. **Project Title:**

   220 Park Road Project

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

   City of Burlingame
   501 Primrose Road
   Burlingame, CA 94010

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

   Catherine Keylon, Senior Planner
   Telephone: (650) 558-7252
   email: ckeylon@burlingame.org

4. **Project Location:**

   220 Park Road, Burlingame, CA
   (see Figure 1-1)

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

   029-204-250

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

   220 Park-Burlingame, LLC
   Contact: Andrew Turco, (650) 377-5808

7. **General Plan Designation:**

   Howard Avenue Mixed-Use District

8. **Zoning**

   Howard Avenue Mixed-Use District

9. **Description of Project:**

   Please refer to Chapter 2, *Project Description*.

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

    The site for the 1.28-acre 220 Park Road Project (Project) is within the downtown area of the city on Park Road, mid-block between Burlingame Avenue to the west and Howard Avenue to the east.[1] The Project site fronts Lorton Avenue to the north and Park Road to the south. Immediately to the west is Lot E, which is currently owned and operated by the City of

[1] For the purposes of this analysis, true northeast will be considered north so that Park Road and Lorton Avenue can be considered east–west roadways and Burlingame Avenue and Howard Avenue can be considered north–south roadways.

Burlingame as a public surface parking lot; the lot has 72 spaces. Burlingame Creek is channelized within an underground box culvert that runs through Lot E and a portion of the Project site. The 10-foot-wide culvert sits approximately 5 feet in from the western edge of the northern portion of the Project site.

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

    The following approvals may be required for the Project:

    - Environmental review, including approval of a mitigation monitoring and reporting program
    - Design review
    - Historic review permit/historic variances for height and parking
    - Tree removal permit
    - Demolition, grading, construction, occupancy permits
    - Easements for underground parking and stormwater infrastructure
    - Parking agreements for nights and weekends

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

    The Native American Heritage Commission (NAHC) was contacted on July 23, 2020, and asked to conduct a search of its Sacred Lands File and provide a list of California Native American tribes that have a cultural affiliation with the geographic area of the Project site. The NAHC returned a negative finding regarding the search of its Sacred Lands File; however, on July 24, 2020, the NAHC provided a list of six tribal representatives. On August 6, 2020, an email was sent to all six individuals identified by the NAHC. Emails included a formal notification letter, pursuant to Assembly Bill (AB) 52, that contained Project details, a location map, and a request for consultation. The following individuals were contacted:

    - Monica Arellano, Vice Chairperson – Muwekma Ohlone Indian Tribe of the San Francisco Bay Area
    - Tony Cerda, Chairperson – Costanoan Rumsen Carmel Tribe
    - Andrew Galvan – Ohlone Indian Tribe
    - Charlene Nijmeh, Chairperson – Muwekma Ohlone Indian Tribe of the San Francisco Bay Area
    - Ann Marie Sayers, Chairperson – Indian Canyon Mutsun Band of Costanoan
    - Irenne Zwierlein, Chairperson – Amah Mutsun Tribal Band of Mission San Juan Bautista

    Follow-up phone calls were made to all six individuals listed above on September 21, 2020. Mr. Cerda, Ms. Nijmeh, and Mr. Galvan were unavailable. Voicemails were left with a brief description of the Project and a request for a call back from Mr. Cerda, Ms. Nijmeh, and Mr. Galvan. Ms. Arellano was also unavailable; however, no voicemail was left because of a full voicemail box.

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Figure 1-1
Project Location

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Ms. Zwierlein stated that, although she had no concerns regarding construction of the Project, pre-construction cultural resources sensitivity training should be given to all crew members involved with ground disturbance. In addition, Ms. Sayers stated that she had no concerns regarding construction of the Project; she had no other comments.

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Chapter 2
Project Description

Introduction

The Project Sponsor, 220 Park–Burlingame, LLC, is proposing to redevelop 1.28 acres of land at 220 Park Road in the heart of downtown Burlingame, California. The site for the 220 Park Road Project (Project) contains a historic United States (U.S.) Post Office building (Post Office building), which is currently unoccupied; a free-standing garage; and a surface parking lot with 51 parking spaces. The Project would create approximately 12,500 gross square feet (gsf) of ground-floor retail space, inclusive of the preserved portions of the existing Post Office building, along with approximately 140,000 gsf of upper-story office space and approximately 27,500 gsf of lobby, circulation, and back-of-house space within the building. The entire building area would total approximately 180,000 gsf. Approximately 280 parking spaces would be provided in a new two-level underground garage, providing parking for the office use above. The Project's parking would be made available to the public on evenings and weekends. The Project would also include an outdoor space along an adjacent lot that is owned by the City of Burlingame (City). This space would help activate a future plaza, which is proposed as a separate project, as discussed below.

The Project would incorporate the historically significant elements of the existing Post Office building, which has been determined to be eligible for listing on the National Register of Historic Places, into the ground-floor retail space. The preserved portions of the Post Office building would be dominant elements of the overall Project. The historic nature of the building was set out in a preservation covenant that was formalized in 2013.

Project Location

Project Location

Downtown Burlingame offers a diverse mix of shops, restaurants, and professional offices with a regional emphasis. As shown in Figure 1-1, the 1.28-acre Project site is within the downtown area of the city on Park Road, mid-block between Burlingame Avenue to the west and Howard Avenue to the east.[2] The Project site fronts Lorton Avenue to the north and Park Road to the south. Immediately to the west is Lot E, which is currently owned and operated by the City as a public surface parking lot with 72 spaces. Burlingame Creek is channelized within an underground box culvert that runs through Lot E and a portion of the Project site. The 10-foot-wide culvert sits approximately 5 feet in from the western edge of the northern portion of the Project site. The Burlingame Public Works Department does not allow permanent structures over this facility.

[2] For the purposes of this analysis, true northeast will be considered north so that Park Road and Lorton Avenue can be considered east–west roadways and Burlingame Avenue and Howard Avenue can be considered north–south roadways.

The City is pursuing design and development of a town square/community open space (Town Square Project) for Lot E. The Town Square Project, in the heart of downtown Burlingame, is intended to be a public gathering space. The plaza could include areas for both active and passive enjoyment, with the goal being the provision of a space that is properly suited for downtown events and gatherings. Although the Town Square Project is not part of this Project, the plaza is intended to be developed in coordination/cooperation with this Project, depending on the City's discretion and schedule.

The Project site (Assessor's Parcel Number 029-204-250) covers 1.28 acres of land; the site is currently occupied by the Post Office building, along with supporting features. The 13,300 gsf building was constructed in 1941; it closed in 2015. The building's smooth stucco cladding and clay tile roof were designed to reflect the Spanish Eclectic style, with Art Deco elements incorporated throughout the interior. The Post Office building has an existing preservation covenant that requires preservation or reuse of portions of the property (i.e., the parts of the Post Office building that have been designated as historically significant) to meet the Secretary of the Interior's Standards for the Treatment of Historic Properties. The preservation covenant enumerates the specific historic character-defining features of the building that are to be protected.

The Project site also includes a 1,275 gsf free-standing garage and a surface parking lot with 51 spaces. The Project site has remained unused since 2015 and is currently surrounded by a chain link fence.

Regional highways and roadways that provide access to the Project site include U.S. 101, approximately 0.6 mile to the northwest, and El Camino Real/State Route 82, approximately 0.25 mile to the south. In addition, the Project area is well served by the San Mateo County Transit District (SamTrans), Caltrain, and the Burlingame Trolley. The Burlingame Caltrain station is approximately 0.1 mile north of the Project site, providing weekday service from San Francisco to Gilroy and weekend service from San Francisco to San José. Existing SamTrans bus routes serve transit stops near the Project site.

Burlingame Downtown Specific Plan

Adopted in 2010, the Burlingame Downtown Specific Plan (Specific Plan) guides development of Burlingame's downtown district, with a particular focus on Burlingame Avenue and Howard Avenue. The goals of the Specific Plan include incentivizing additional business growth along Howard Avenue and side streets, re-examining downtown parking requirements, protecting and preserving downtown's historic character, and providing inviting gathering places and pedestrian-friendly streets. Given the proximity of downtown to the Burlingame Caltrain station, the Specific Plan creates opportunities for carefully located, more intense development projects that take advantage of the easy transit access and respond to the desire of existing and prospective residents to work and live in a walkable environment. Based on the vision of the Specific Plan, extensive streetscape improvements along Burlingame Avenue were completed in 2015. In addition, since adoption of the Specific Plan, several residential and commercial projects have been constructed; others are either in the process of being constructed or going through the planning process.

The Project site is in the Howard Avenue Mixed-Use (HMU) District, which includes retail, office, and multi-family residential uses along Howard Avenue. Ground-floor retail use is encouraged, and both housing and/or office uses are allowed on upper levels above commercial uses. The interceding side streets in this area (Lorton Avenue, Park Road, Primrose Road, and Highland Avenue) act as connector streets. The height limit in this planning area is 55 feet, and the maximum average residential unit size

is 1,250 gsf. There are no requirements related to setbacks, maximum lot coverage, or landscape coverage, with the exception of the R-3 side setback standards, which apply to any property line with an existing residential use on the abutting property.

Chapter 4 of the Specific Plan, *Streetscape & Open Space*, describes the Project site as a potential location for a future project. As noted in the Specific Plan, if United States Postal Service operations were to move elsewhere, which they have since adoption of the Specific Plan, then the Post Office building could be adaptively reused.

Project Characteristics

Land Use and Zoning

As mentioned above, the Project site is in the HMU District. In general, the Project is consistent with the requirements for development in the HMU District, which is intended for a mix of uses, with retail encouraged on the ground floor and housing and/or office uses allowed on the upper floors. However, the Project would require variances for height and parking; such variances are allowed under City Municipal Code Section 21.04.120 to incentivize the preservation of historic structures.

The HMU District allows buildings with a maximum building height of 55 feet. The overall roof height of the proposed building would be approximately 86.5 feet (98.5 feet with inclusion of the roof screen), which is approximately 31.5 feet higher than the permitted height (43.5 feet with inclusion of the roof screen). In addition, the variance for historic preservation would cover a reduction in the number of parking spaces. The Project's office parking is currently proposed at a ratio of one space per 500 gsf, whereas one space per 300 gsf is required. This equates to 280 spaces proposed but 467 spaces required. The Project would comply with all other HMU District requirements pertaining to setbacks, minimum lot size, street frontages, and minimum ground-floor ceiling heights. Through compliance with the historic preservation covenant, and by placing the property on a historic registry, the Project is anticipated to meet the criteria for a development variance. Findings will be made by the Planning Commission after a duly noticed public hearing.

Proposed Development

The Project represents a downtown mixed-use retail and office project, with retail uses and a lobby on the ground floor and five levels of office uses above. Figure 2-1 depicts the proposed site plan. The Project would include approximately 12,500 gsf of ground-floor retail uses, which would encompass a portion of the existing Post Office building. An additional 27,500 gsf of ground level space would be allocated to lobby space for the upper–level offices and back-of-house space (e.g., trash collection areas). Above the ground level would be approximately 140,000 gsf of office uses. In total, the Project would have 180,000 gsf of building area. The proposed retail areas would be along Lorton Avenue, along Park Road, and adjacent to a new public plaza (Town Square Project), which is proposed by the City as a separate project. These adjacent retail uses would provide outdoor space for seating, dining, community/cultural events, and landscaping. The entire Project would be built over a new two-level underground garage that would accommodate the required parking for the office uses. No parking is required by code for retail uses in this area. Lot coverage with the proposed building would total approximately 40,000 square feet (sf), or 0.92 acre, with a floor area ratio of 3.23.

Retail and Rehabilitated Post Office Building

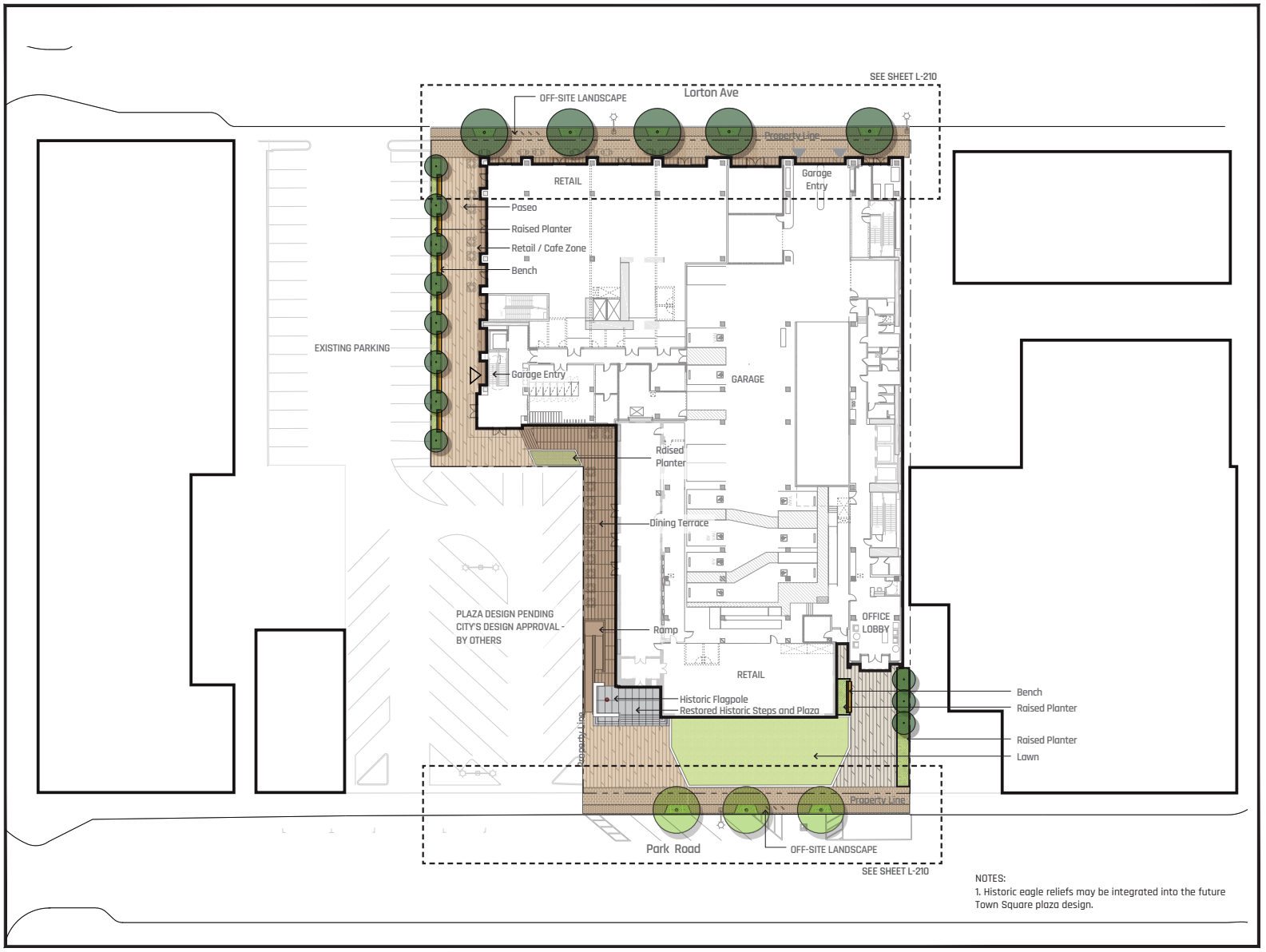
As shown in Figure 2-2, round-floor retail uses and ancillary building services would occupy approximately 12,500 gsf along Lorton Avenue, at the future Town Square Project, and along portions of Park Road. Retail space would be provided for two to four separate tenants. A portion of the proposed retail space (approximately 4,840 gsf) would be provided in the rehabilitated Post Office building. To accommodate this retail space, the Project would restore and reactivate portions of the historic Spanish-Deco Post Office building in accordance with the 2013 preservation covenant, which is applicable to the site. The Post Office building's marble-clad lobby, main historic entry, Park Road–fronting façade, and setback along Park Road would be preserved. This preservation would be consistent with the 2013 preservation covenant, the City's Historic Preservation Ordinance, and the Secretary of the Interior's guidelines while enabling essential redevelopment on the remainder of the site in order to reactivate the property and subsidize the historic rehabilitation. Although the historically significant portions of the Post Office building would be retained, the rest of the vacant Post Office building, as well as a free-standing garage, would be demolished.

The primary façade of the Post Office building on Park Road would be retained in its entirety. To the east, a new office lobby would be constructed but set back substantially from Park Road to allow the Post Office building's façade to remain prominent. The south/southwest façade of the Post Office building, which contains the historic lobby, would be largely retained. The Lorton Avenue entrance vestibule on the north side of the building would be demolished; a new addition would meet the Post Office building at this point. However, the full length of the historic lobby, with its seven bays of fenestration, would be retained. A new terrace would be constructed along the west/southwest façade, and three of the openings for windows would be expanded downward to meet the floor, allowing doors to be inserted between the historic lobby and new terrace. Within the Post Office building, the interior lobby and Park Road vestibule would be preserved, with few changes to historic materials, spaces, or features. Original material that must be removed would be salvaged to the extent reasonably possible, provided it could reasonably be used to repair or replace other historic material.

Table 2-1, below, summarizes the exterior and interior historic features of the Post Office building that would be retained, largely retained and/or salvaged, or removed/demolished.

Office Use

The upper floors (Figures 2-3 and 2-4) would be designed for office use, either a single tenant or multiple tenants, and total approximately 140,000 gsf. The new office building would be designed to engage with the preserved portions of the existing Post Office building. The proposed building's form would tier and step back as it rises, providing relief from the Post Office building, the future Town Square Project, and the public retail corridors along Park Road and Lorton Avenue. Along the Park Road façade of the Post Office building, the upper stories of the proposed building would be set back from Park Road, creating a second-story terrace. The proposed office building would be designed in a contemporary style to differentiate it from the historic Post Office building while complementing the historic resource through a reference to Art Deco massing and the treatment of windows and spandrel panels, which are slightly recessed and vertically grouped on the historic Post Office building.



Source: Bionic, 2020.

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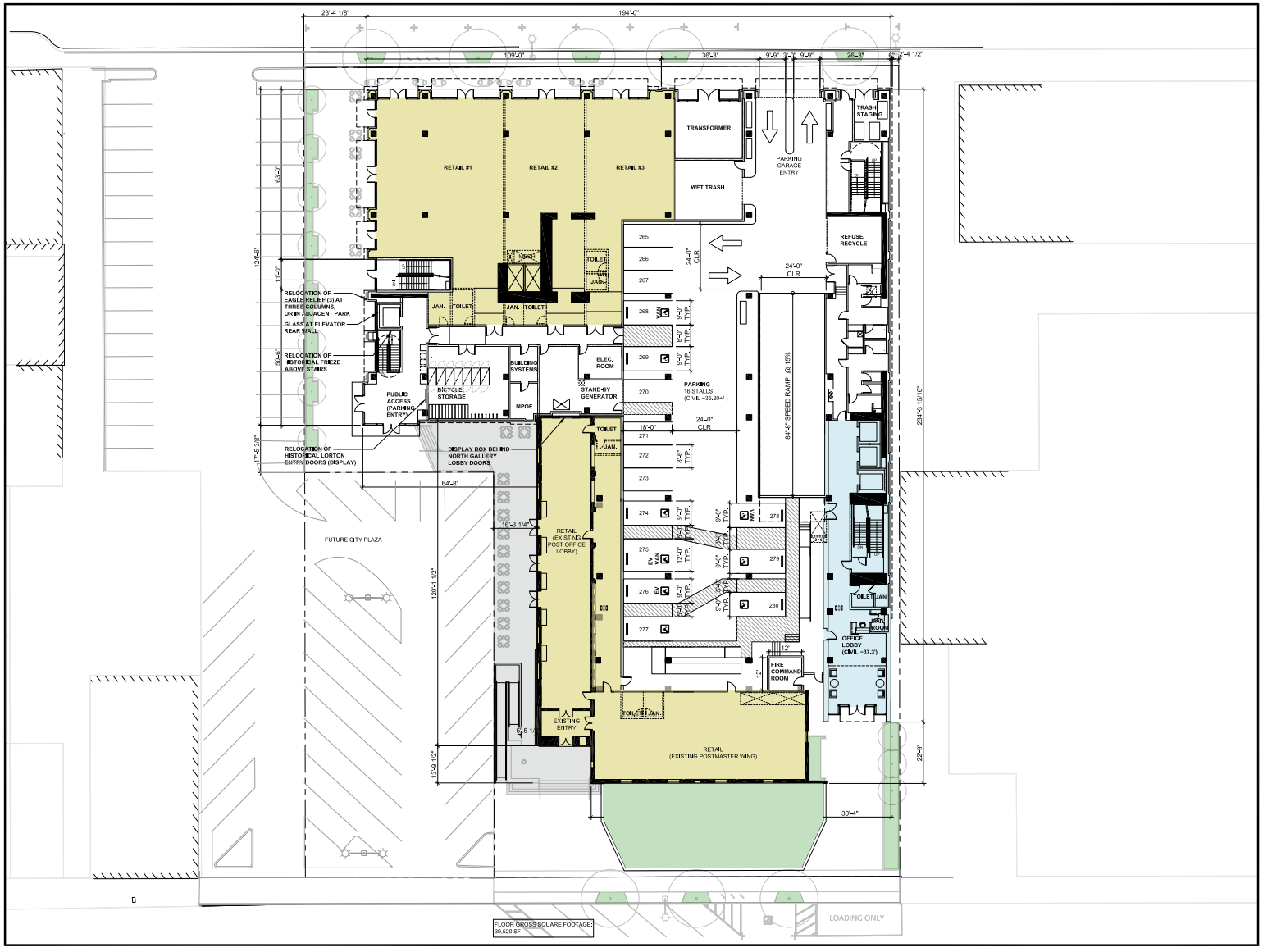
Figure 2-1
Site Plan



Source: KSH Architects, 2020.

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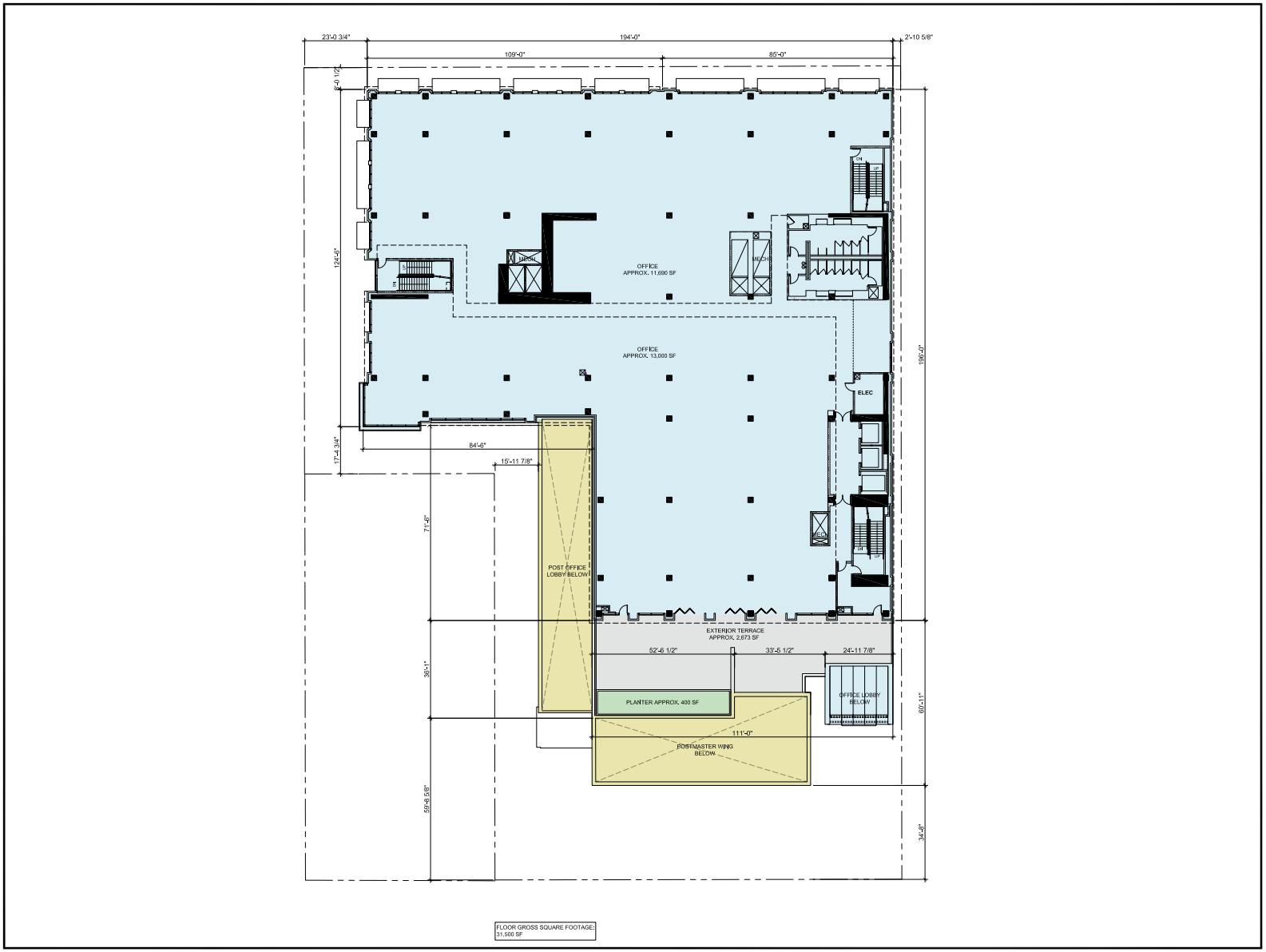
Figure 2-2
Ground Floor Plan



Source: KSH Architects, 2020.

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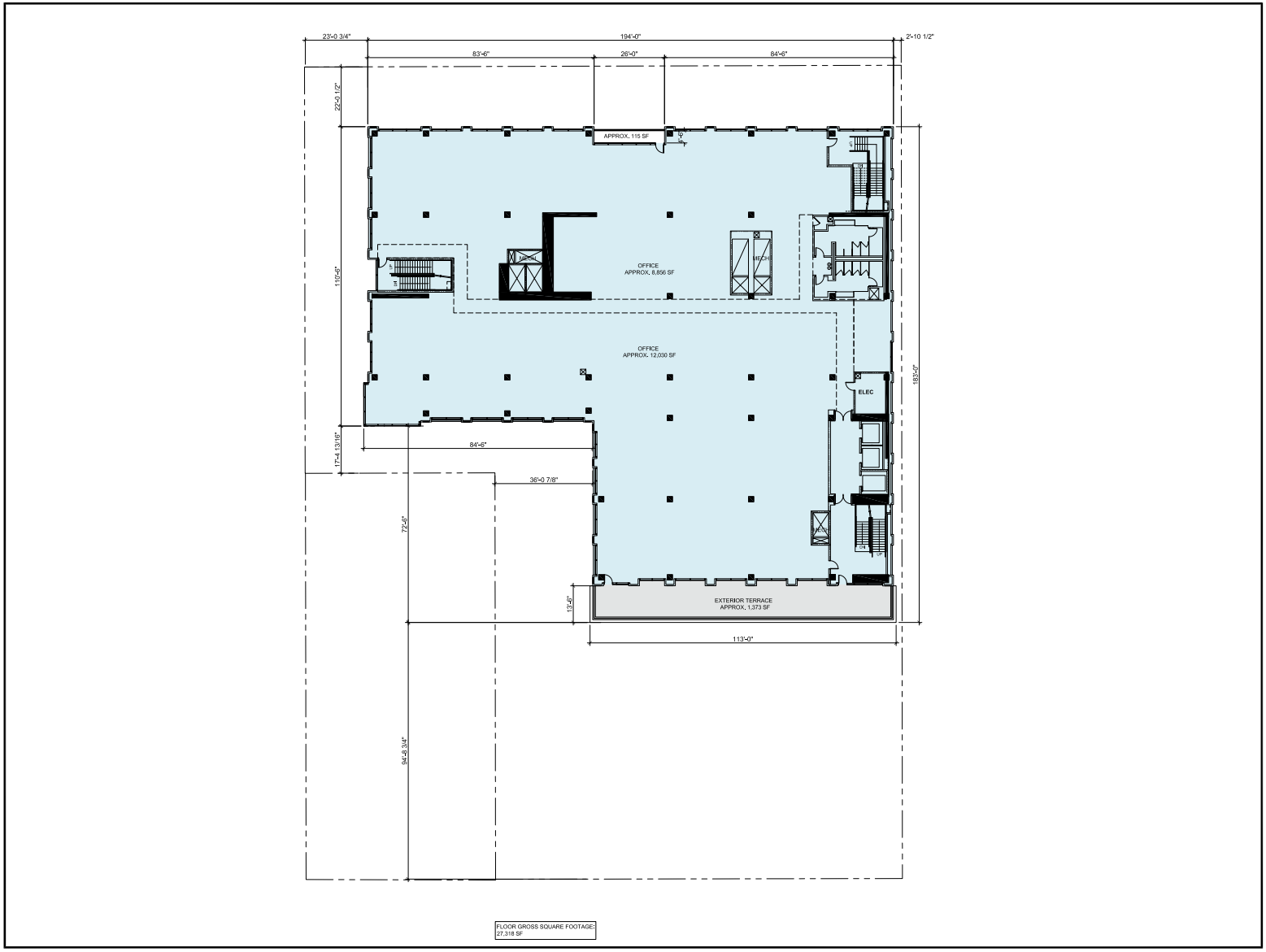
Figure 2-3
Second Floor Plan



Source: KSH Architects, 2020.

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Figure 2-4
Fifth Floor Plan

Table 2-1. Post Office Building Features to Be Retained, Salvaged, or Removed

Location	Retained Features	Largely Retained and/or Salvaged Features	Removed/Demolished Features
Exterior Structure			
Park Road Façade	All exterior building façades would be retained.	n/a	Interiors behind the façades would be removed.
Lorton Avenue Façade	n/a	Sculptural panel (*The Letter*), fully glazed metal frame, double-leaf doors with decorative eagle transom, pressed metal door surround, and small sculptural eagle tiles under each window	All exterior building façades and interiors would be removed.
South/Southwest Façade (historic lobby)	The full length of the historic lobby, with seven bays of fenestration, would be retained (with modifications to three of the bays to allow for doors and the addition of a raised patio on the exterior).	n/a	The non-original Americans with Disabilities Act–compliant ramp would be removed, though a new ramp would need to be constructed for the same purpose.
Rear Mailroom/ Loading Area	n/a	n/a	All structures would be removed.
Interior Features			
Post Office Lobby (Park Road)	Marble wainscoting, interior multi-light double doors and multi-light flanking side panels, historic light fixture, historic glass-panel double doors that lead to the historic office wing along Park Road, historic pendant light fixtures, terrazzo flooring, original wall-mounted tables, original service windows, original mounted metal vitrines, original post office boxes, vestibule doors.	Lobby's marble wainscoting and historic metal grilles to be removed under the center three windows on the west wall (marble would be salvaged only if feasible); portions of the three center metal-sash windows would be altered, allowing doorways to be inserted, providing access to the proposed exterior terrace and park.	Plasterboard carousel near the Lorton Avenue entrance, acoustical tile on the walls and ceiling, plaster finish on the ceiling, and fluorescent light fixtures over the wall-mounted tables.
Non-Public Post Office Areas	Double doors leading to the office wing from the Park Road vestibule; the metal "POSTMASTER" lettering mounted over the doorway (space to be converted to retail use).	n/a	Interior walls.
Lorton Avenue Entrance Vestibule	The original door assembly between the Lorton Avenue vestibule and the lobby.	n/a	The Lorton Avenue entrance vestibule structure.

Source: KSH Architects, Page & Turnbull, 2020

The upper levels of the proposed office building would step back from the edges of the property along Park Road, Lorton Avenue, and the future Town Square Project, ultimately reaching a height of six stories. A system of vertical columns and windows would create a consistent architectural theme across the façade of the building. Windows would be set within the concrete skin of the building to articulate the vertical elements. Balconies would be placed at the setbacks of the new building to activate the vertical planes and provide outdoor space for office occupants. The building would also feature materials and treatments that would complement those on the façade of the existing Post Office building.

Parking

Parking for the Project would be provided primarily within two levels of underground parking, which would span the entirety of the Project site, including the area under the historic Post Office building, as well as a portion of the neighboring future Town Square Project site. A small number of interior parking stalls would also be provided at ground level behind the retail and lobby areas, for a total of 280 spaces at the Project site. The underground and ground-level parking would have a vehicular entrance and exit at Lorton Avenue. Stairs and elevators to the underground parking garage for the office tenants would be located along the eastern façade of the proposed building. In addition, stairs and an elevator for office tenants and the general public, during public parking hours, would be provided along the western façade. Figure 2-5 depicts the below grade parking plan.

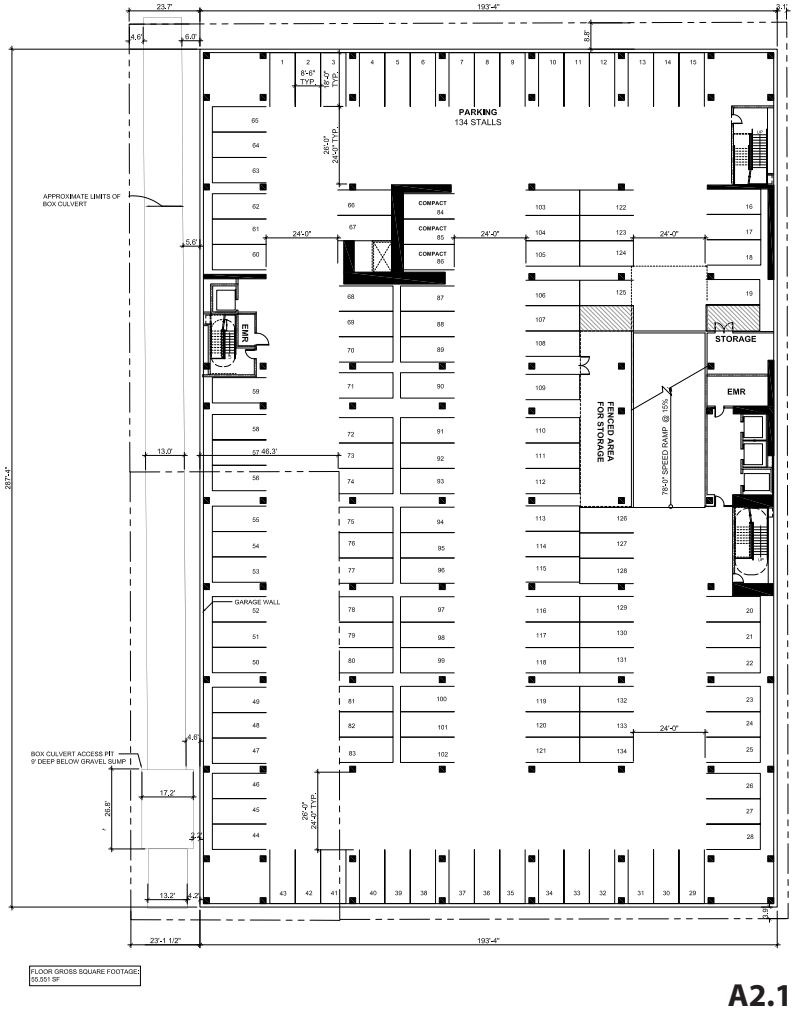
An easement from the City would allow the underground parking garage to extend under a portion of the adjacent City-owned property, the site for the future public plaza. In exchange for this easement as well as a reduced parking ratio, the Project would make its parking spaces available for public use at certain times on weekends and on weekday evenings. This would provide greater parking capacity and accommodate visitors to Burlingame's downtown at the specified times. The 280 parking spaces would also offset the loss of 38 to 72 public spaces in Lot E when the City implements its future Town Square Project.

No onsite parking would be provided for the proposed retail uses, consistent with HMU District zoning. Existing 45-degree and parallel parking spaces along the property's street frontages would generally be maintained, except where curb cuts would need to be relocated or modified to provide site access or where rideshare drop-off and pickup zones, as well as loading zones, are designated.

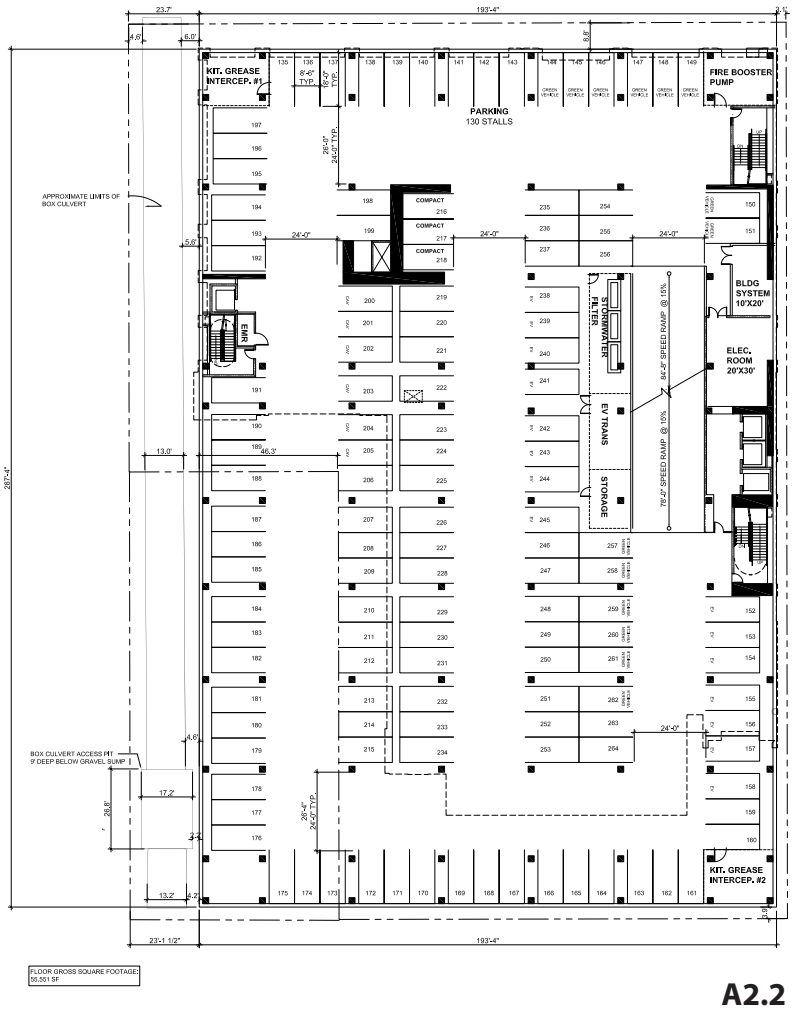
Site Design

The Project site would provide outdoor space along the adjacent Lot E to help activate this future plaza (Town Square Project). The proposed building would be set back from the underground culvert that runs along the western edge of the property; that space would be dedicated for a new landscaped paseo. The proposed paseo would include pavers similar or complementary to those on Burlingame Avenue, plantings, stormwater treatment planters, and outdoor furniture for the future retail uses fronting this area. The paseo would become a new mid-block pedestrian connection, linking the proposed Town Square Project with Lorton Avenue and extending Burlingame Avenue's public realm toward the Town Square Project. Along the historic lobby of the Post Office building, the Project would include an elevated patio, providing opportunities for outdoor dining and engagement between the future Town Square Project and the Project site.

Around the property perimeter, the design language, materials, and trees along Burlingame Avenue would be incorporated into the sidewalks fronting the Project site to help expand and activate the future public realm. During construction of the Project, approximately 11 to 14 trees on the Project site and along the sidewalks would be removed. Removal of the sidewalk-fronting trees along Lorton



A2.1



A2.2

Source: KSH Architects, 2020.

Figure 2-5
Below Grade Parking Plan

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Avenue would be consistent with the City's Tree Preservation Ordinance. Tree removal would allow for a wider sidewalk, consistent with the sidewalk layout east of the Project site, and a new retail frontage along Lorton Avenue, which would activate the pedestrian realm along this section of the avenue. The new sidewalk would accommodate approximately five to eight new street trees in a layout that would more closely match that on the opposite side of Lorton Avenue, an area where street trees are in wells on the street-fronting portion of the sidewalk.

Although the configuration of the Project site would allow fire department access to the north and south sides of the proposed building (i.e., along Lorton Avenue and Park Road), the building would be adjacent to the property line on the east side of the site. Future redevelopment of existing parking to create a plaza on the west side of the development may limit fire department access in this area. A request for alternate means of fire department access is pending approval of the Central County Fire Department.

Figures 2-6 through 2-9 show the building elevations and sections.

Activity/Employment

The City General Plan environmental impact report assumes one employee per 275 gsf of office space, which equates to 510 office employees for the Project's 140,000 gsf of office space. The City General Plan environmental impact report (EIR) assumes one employee for 400 gsf of retail space, which equates to 32 retail employees for the Project's 12,500 gsf of retail space. Therefore, in total, the Project would result in approximately 542 total new employees at the Project site.

Transportation Demand Management Plan

The Project Sponsor has developed a Transportation Demand Management (TDM) Plan[3] to reduce the number of drive-alone trips generated by the Project by shifting a proportion of trips to more sustainable modes, such as walking, biking, transit, or carpooling. As a result, this would help to alleviate some traffic congestion, reduce greenhouse gas emissions and other air pollution, and reduce demand for parking. The goal of the TDM Plan for the Project is to achieve a 20 percent trip reduction, consistent with the City of Burlingame's Climate Action Plan.

Key elements of the TDM Plan, which would result in a trip reduction of approximately 7 percent, would include:

- Infill Development/Pedestrian-Oriented Design: infill developments are typically located in more mixed-use contexts and generate fewer vehicle trips.
- Reduced Parking Supply: A reduced parking supply (1 stall per 500 SF of office space) encourages tenants to only allocate parking stalls and encourages employees to only commute by private SOV when absolutely needed.
- Shared Parking: On evenings and weekends, parking will be available to the public.
- Preferential Carpool/Vanpool Parking: Designated parking spots can encourage employees to carpool to work.
- Secure Bicycle Parking: Secure bicycle storage for employees who bike to work provide employees with a reliable location to park their bikes that is protected from weather and theft.

[3] Fehr & Peers. 2020. *220 Park Road Transportation Demand Management Plan*. November 12. Prepared for 220 Park-Burlingame, LLC.

- Showers and Lockers: Showers and lockers provided to encourage employees to commute by bicycling.
- Bicycle Repair Station: Provision of a repair station with bicycle stand and tools for tire changes and other minor repairs, either in a publicly-accessible location such as the adjacent park, or in the secure bike room facilitate bike commutes.
- Onsite Amenities: Provision of on-site amenities/accommodations that encourage people to stay on site during the workday, making it easier for workers to leave their automobiles at home.

The TDM Plan also includes additional measures to be taken by individual tenants to reduce drive alone trips through initiatives that cater to each individual company's employee base. Tenant would be required to reduce trips that would meet an estimated additional 13 percent reduction above the estimated 7 percent reduction through measures provided by the Project Sponsor (as listed above). Other measures that could be implemented by future tenants include: a Transportation Manager/Commute Marketing Program, employee surveys, guaranteed ride-home program, parking cash-out subsidies/pre-tax commuter benefits (subsidized transit passes, bicycling subsidies, carshare subsidies, and/or carpool/vanpool subsidies), fleet of bicycles, ridesharing partnership, ride-matching program, and flexible working schedules. Regular monitoring and reporting would ensure that tenants are in compliance with C/CAG and City of Burlingame standards for trip reductions. Additionally, annual monitoring provides an opportunity for tenants to assess the success of their TDM programs and to make adjustments or revisions as needed to achieve their TDM reduction goal.

Utilities

Onsite utilities would include energy (gas and electric), domestic water, wastewater, and storm drain services. All onsite utilities would be designed in accordance with applicable codes and current engineering practices. The Project would meet California Green Building Standards Code (CALGreen) requirements and target at least a Leadership in Energy and Environmental Design rating of "Gold." The Project would install low-flow plumbing fixtures and LED lights. In addition, a Transportation Demand Management program that promotes walking, cycling, and transit use is being developed.

Energy

Existing Pacific Gas and Electric Company gas and electric lines in the vicinity would continue to serve the site. Most building systems would be electric. Although the heating, ventilation, and air-conditioning and hot water systems would be gas powered, an electric system is being explored as a possible alternative. Restaurant kitchens would rely on gas heating sources. A standby diesel-powered generator would be installed for emergency use.

Domestic Water

The Burlingame Public Works Department provides water to the Project site. Existing service to the site would be abandoned under the Project. New connections for domestic and irrigation water would extend to the 12-inch water main in Lorton Avenue and the 8-inch main in Park Road. The sizes for the new connections have not yet been established, but it is assumed that the Project would include a 2-inch lateral. Annual water consumption is anticipated to total 1.6 million gallons. The Project would be required to meet the regulations of the Water-Efficient Landscape Ordinance; however, a waiver would be sought for the historic lawn between the façade of the historic Post Office building and the Park Road street frontage. Recycled water would not be used onsite.

Source: KSH Architects, 2020.

ICF Graphics ... 00351.20 (10-28-20) JC

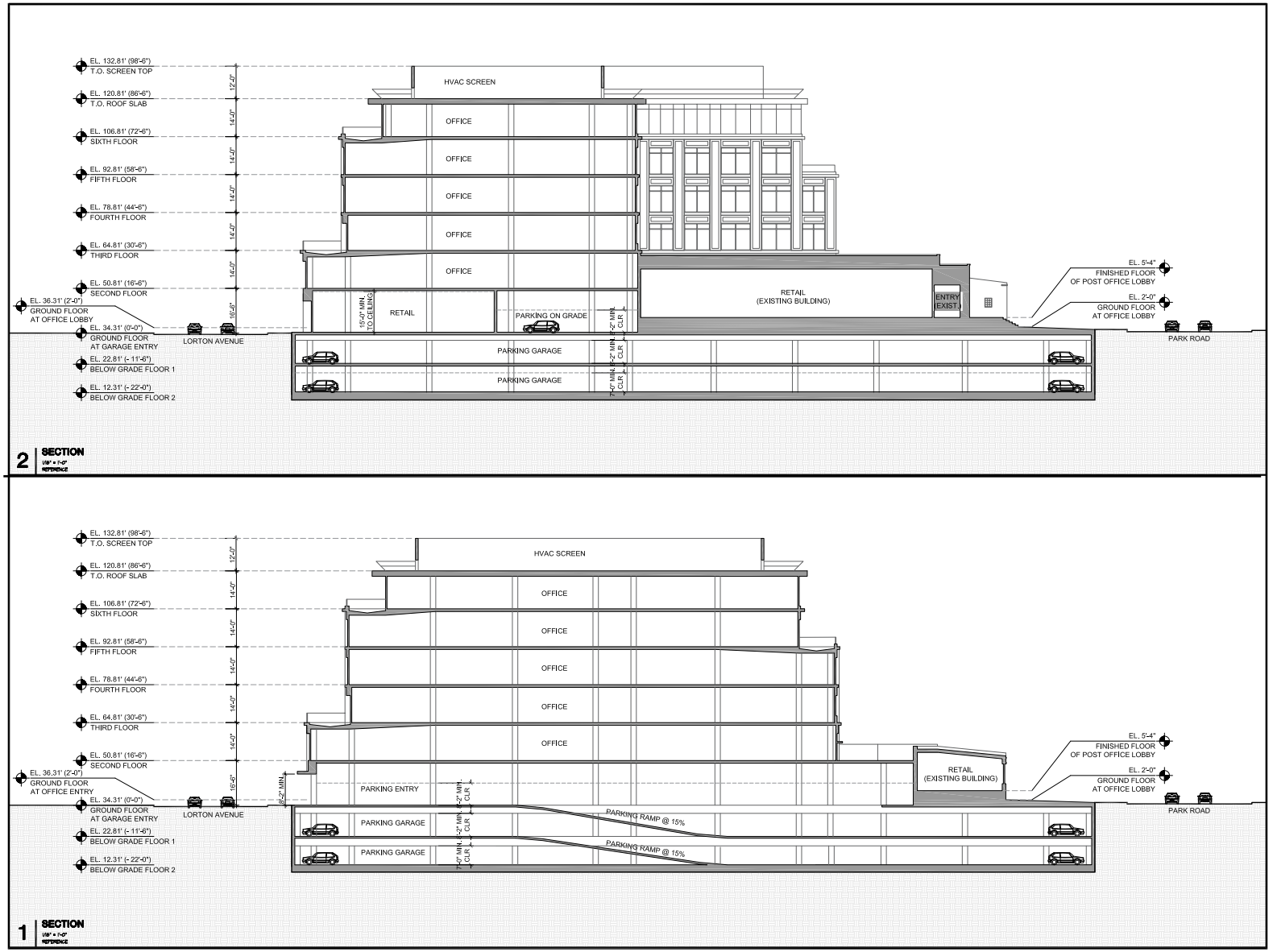
ICF

Figure 2-6
Southwest and Northeast Elevations

Source: KSH Architects, 2020.

ICF Graphics ... 00351.20 (10-28-20) JC

Figure 2-7
Southeast and Northwest Elevations



Source: KSH Architects, 2020.

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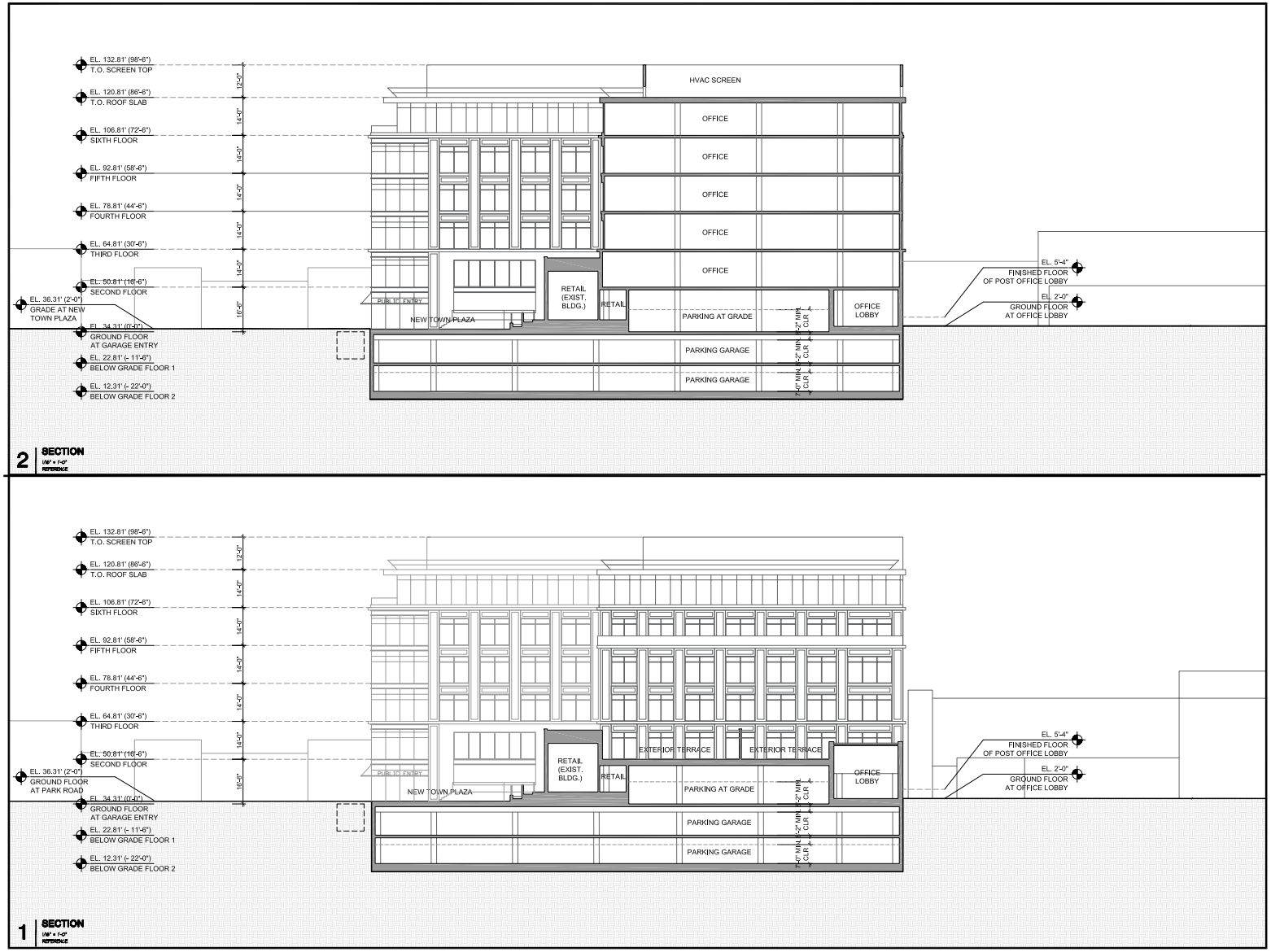
Figure 2-8
Building Sections



Source: KSH Architects, 2020.

ICF Graphics ... 00351.20 (10-28-20) JC

Figure 2-9
Building Sections

Wastewater

The Burlingame Public Works Department provides wastewater and sanitary sewer services at the Project site. An existing 6-inch sanitary sewer line is located in Lorton Avenue. Under the Project, approximately 200 linear feet of the sewer line in Lorton Avenue would be upgraded. The line would be upgraded from a 6-inch vitrified clay pipe to an 8-inch high-density polyethylene pipe.

Storm Drainage

The Project site currently consists of approximately 13,650 sf of pervious surfaces and 41,450 sf of impervious surfaces. With implementation of the Project, approximately 3,500 sf of the Project site would be pervious surfaces and approximately 52,000 sf would be impervious. This would increase the amount of impervious surfaces by approximately 10,500 sf. Stormwater treatment areas and planters, totaling approximately 2,000 sf, would be located throughout the Project site; any overflow would drain to Park Road. The existing stormwater infrastructure includes a 24-inch storm drain main in Park Road. There may also be a direct connection to the 4-foot by 10-foot concrete box culvert that runs along the western edge of the site. Stormwater treatment measures, in compliance with state and County of San Mateo requirements, would be implemented on the site, including a combination of mechanical filters, stormwater treatment planters, and permeable surfaces to meet C.3 requirements.

Project Construction

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

Construction Schedule and Phasing

Project construction is expected to start in mid-2021, with projected occupancy to occur in mid-2024, subject to the entitlements timeline, plan check timeline, and final construction schedule. The Project would consist of eight construction phases, which may occur at the same time or overlap. Standard construction work hours would be 8:00 a.m. to 5:00 p.m. Monday through Friday. For extenuating circumstances, permission may be sought from the City to work at night and on weekends, but such work is not planned at this time.

The following phases are expected during construction of the Project:

- Demolition, Salvage, and Protection: months 1-3
- Historic Building Temporary Relocation: months 4-6
- Excavation, Shoring, and Grading: months 7-10
- Foundation Work: months 11-15
- Building Structure and Exterior Systems: months 16-23
- Historic Building Relocation Back and Restoration: months 20-22
- Site Improvements: months 24-27
- Building Finals and Closeout: months 28-30

The size of the construction workforce would vary during the different phases of construction. The maximum number of construction workers required for construction would be approximately 100 per day during the Building Structure and Exterior Systems phase of construction.

Post Office Building during Construction

As discussed above, the Post Office building would be retained at the northwest/west portions of the structure, and the building's exterior would be retained along the primary Park Road façade to the southwest, all with little change to the materials, design, feeling, or massing of the building. However, to protect the historic resource from potential damage due to vibration and construction activities during excavation and construction of the below-grade garage levels, these preserved portions of the former Post Office building would be temporarily relocated outside of the footprint of the to-be-constructed parking garage to the adjacent site (Lot E) to the northwest and to a portion of the adjacent Park Road right-of-way to the southeast. The preserved portions of the building would then be returned to their historic location and orientation following completion of the underground parking garage and grade-equivalent concrete deck above the underground parking.

Relocation and preservation would occur as follows: First, salvaged items from those portions of the Post Office building that are to be demolished would be removed and stored in a staging area. Specifically, roof tiles from the Lorton Avenue administrative wing and stair treads from the Lorton Avenue steps would be salvaged to replace roof tiles and stair treads on the Park Road frontage that are already damaged and may become damaged during restoration. A frieze, *The Letter,* that sits over the Lorton Ave doors, as well as the Lorton Avenue entry doors themselves, the eagle friezes under the Lorton Ave-facing windows, and other similarly identified architectural elements along the Lorton Avenue frontage, would be salvaged and stored on the adjacent site for later installation in the new building or within the adjacent Lot E (site of the City's future Town Square). The rear mail sorting facility and the Lorton Avenue wing would then be demolished. Steel rails would be inserted through the basement of the historic gallery lobby and entry steps facing Park Road, allowing the lobby and steps to be slid northwest for staging outside the footprint for excavation of the underground parking garage. The marble wainscot and terrazzo floors inside would be protected with fire-resistant Visqueen, Homosote board, and plywood. Nothing would be mechanically attached to the historic materials. Meanwhile, the roof tiles and roof would be removed from the postmaster wing along Park Road; the tiles would be stored for reinstallation on a new roof once the historic elements are moved back in place. The three exterior walls of the postmaster wing would then be cut into two segments, supported with backing, and moved south into a temporary staging area along Park Road, outside the excavation footprint. The cuts would be made in the facades to minimize visibility.

Upon completion of the grade-equivalent parking deck, the gallery lobby structure would be slid back into place and bolted to a new deck at the same location where it previously sat. The walls of the postmaster wing would be reassembled and bolted together on the inside, allowing the exterior to maintain its original appearance. A new roof with full water protection would be installed and sheathed with the historic roof tiles. Additional restoration would commence while construction of the remaining office building continues.

Construction Spoils and Debris

The Project would require excavation and tree removal. Excavation would extend approximately 25 feet below the grade and is expected to require dewatering. The Project would produce approximately 60,000 cubic yards of excavated material. About 60,000 cubic yards of the excavated

material would be exported offsite; none is anticipated to be used as backfill or grading material in landscaped areas within the Project site. In addition, partial demolition of the Post Office building would result in approximately 660 cubic yards of demolition debris. As such, construction of the Project would require the disposal of exported materials at a permitted landfill. All soil and debris, including contaminated soil, would be hauled to the Dumbarton or Newby Landfill or a similar facility. The number of truck trips required for soil disposal would total approximately 5,500 over 50 days. In addition, site demolition would result in 60 loads over 5 days; the aggregate base would result in 15 loads over 4 days.

Construction Equipment and Staging

Typical equipment would be used during Project construction, including excavators, water trucks, street sweepers, loaders, compactors, and skip loaders. Pile drilling would occur during the excavation and shoring phase of construction, which would have a duration of approximately 10 to 15 days. Pile drilling would be required for installation of the approximately 28 hold-downs.

Potential construction laydown and staging areas would be located on Lot E, directly adjacent to the Project site to the northwest. As described above, the existing Post Office building, which would be retained, would be staged in Lot E and in a portion of the Park Road right-of-way during excavation of the below-grade parking garage.

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Chapter 3
Evaluation of Environmental Effects

General Approach

The 220 Park Road Project (Project) would be consistent with the Burlingame Downtown Specific Plan and the Envision Burlingame General Plan (Previous CEQA Documents). Therefore, this Project can tier from the Burlingame Downtown Specific Plan (Specific Plan) initial study/mitigated negative declaration (IS/MND)[4] and the Envision Burlingame General Plan (General Plan or 2040 General Plan) environmental impact report (EIR)[5] under California Environmental Quality Act (CEQA) Guidelines Sections 15162 and 15168. In addition, the Project would comply with the preservation covenant, the City of Burlingame (City) Historic Preservation Ordinance, the Secretary of the Interior's Standards for the Treatment of Historic Properties,[6] and Howard Avenue Mixed-Use (HMU) District zoning. Therefore, Section 15183 of the CEQA Guidelines would apply to the Project. Section 15183 of the CEQA Guidelines mandates that projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects that are peculiar to a project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

In approving a project that meets the requirements of this section, a public agency shall limit its examination of environmental effects to those that the agency determines, in an initial study or other analysis:

- Are peculiar to a project or a parcel on which a project would be located.
- Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan with which a project is consistent.
- Are potentially significant offsite impacts and cumulative impacts that were not discussed in the prior EIR prepared for the general plan, community plan, or zoning action.
- Are previously identified significant effects that, as a result of substantial new information that was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

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4 The Specific Plan IS/MND is incorporated by reference throughout this document and available for public review online (www.burlingame.org/departments/planning/general_and_specific_plans.php). Because of current COVID-19 social distancing requirements, including the order from San Mateo County to adhere to the social distancing requirements, the Specific Plan IS/MND is available for public review at the City of Burlingame Planning Department by appointment only at 501 Primrose Road, Burlingame, CA 94010. To schedule an appointment, email Catherine Keylon at ckeylon@burlingame.org.

5 The General Plan EIR is incorporated by reference throughout this document and available for public review online (www.burlingame.org/generalplan). Because of current COVID-19 social distancing requirements, including the order from San Mateo County to adhere to the social distancing requirements, the General Plan EIR is available for public review at the City of Burlingame Planning Department by appointment only at 501 Primrose Road, Burlingame, CA 94010. To schedule an appointment, email Catherine Keylon at ckeylon@burlingame.org.

6 Note that Section 15064.5(b)(3) of the CEQA Guidelines uses the Secretary of the Interior's Standards for the Treatment of Historic Properties to determine if an impact is significant. If a project follows the standards, then the project impact on historic resources is considered to be mitigated to a less-than-significant level.

An effect of a project on the environment shall not be considered peculiar to a project or a parcel if uniformly applied development policies or standards have been previously adopted by the lead agency, with a finding that the development policies or standards will substantially mitigate that environmental effect when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect.

Previous CEQA Documents

If an impact is not peculiar to a parcel or a project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for a project solely on the basis of that impact. The primary virtue of Section 15183 streamlining is the ability to limit the scope of any new CEQA document. In the case of this Project, the "prior EIR" to be used would include two Previous CEQA Documents, as follows:

- **Burlingame Downtown Specific Plan and Specific Plan IS/MND (May 2010):** The Project is within the Specific Plan area and largely consistent with allowable development identified for the site in the Specific Plan. The Specific Plan IS/MND evaluated buildout of the Specific Plan programmatically and included mitigation measures to reduce potential environmental impacts. These mitigation measures were then adopted as Standard Conditions of Approval (SCAs), which have been found to substantially mitigate environmental effects of individual projects proposed in the area. These conditions incorporate development policies (such as the Burlingame Municipal Code, General Plan, and other requirements of jurisdictional agencies) and must be included in the discussions and analysis of subsequent environmental review for all development projects in the Plan Area. As applicable, the SCAs are adopted as requirements of individual projects when approved by the City and designed to avoid or substantially reduce a project's environmental effects. For CEQA purposes, because SCAs are adopted, they are not considered to be mitigation measures but, rather, requirements for the Project, as needed.
- **Envision Burlingame General Plan and General Plan EIR (January 2019):** In January 2019, the City adopted the Envision Burlingame General Plan, which outlined the community's conservation and development goals until 2040. The EIR conducted for the 2040 General Plan the EIR is described in Section 15168 of the CEQA Guidelines as the appropriate analytical framework for assessing the cumulative environmental effects of the full plan in a first-tier level of analysis, identifying broad concerns and sets of impacts, and defining/developing regulatory standards and programmatic procedures that reduce impacts and help achieve environmental goals and objectives. Later activities proposed pursuant to the goals and policies of the 2040 General Plan (such as the Project) will be reviewed in light of 2040 General Plan EIR and may focus on those site-specific and localized environmental issues that could not be examined in sufficient detail as part of the EIR. As with all projects proposed in the city, projects contained in specific focus areas where land use changes are proposed will be subject to CEQA compliance at such time the City receives a permit application for a project.

Environmental Factors Potentially Affected

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

Determination

On the basis of this initial evaluation:

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

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

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

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

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

Signature — Date: 11/13/20

KEVIN GARDINER — CITY OF BURLINGAME

Printed Name COMMUNITY DEVELOPMENT DIRECTOR — For

Evaluation of Environmental Impacts

Introduction

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

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

The analysis in this document considers all phases of Project planning, construction, implementation, and operation. The following is a modified environmental checklist, based on Appendix G of the CEQA Guidelines. The modified checklist/initial study is used to describe the impacts of the Project. A discussion follows each environmental issue identified in the checklist. Included in each discussion are project-specific mitigations measures, if required and recommended as appropriate for the Project.

For this checklist, the following designations are used:

- **Significant Impact Peculiar to the Project or Project Site:** An impact that could be significant because of something peculiar to the Project or the Project site that was not previously identified in the Specific Plan IS/MND and/or the General Plan EIR. If any potentially significant impacts are identified, then an EIR must be prepared that analyzes those impacts.
- **Significant Impact Not Identified:** An impact would be considered significant if there were substantial changes to the Project.
- **Significant Impact Due to Substantial New Information:** An impact that would be considered significant because of new information that was not known at the time that the prior EIR and/or IS/MND was prepared. If any significant impacts are identified, then an EIR must be prepared that analyzes those impacts.
- **Impact Adequately Addressed in Previous Documents:** Impacts that were previously evaluated in the Specific Plan IS/MND and/or the General Plan EIR that would not change, based on the previous evaluation. This designation applies when the Project would not result in a significant new impact, a substantially increased significant impact, or a peculiar impact that was not analyzed in the Previous CEQA Documents.

I. Aesthetics and Vehicular Parking Analysis

In accordance with Public Resources Code Section 21099, Modernization of Transportation Analysis for Transit-Oriented Projects, aesthetics and parking shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets the following criteria:

a. The project is on an infill site

b. The project is in a Transit Priority Area (TPA)[7]

c. The project is a residential, mixed-use residential, or employment-center use

"Infill sites" include lots within a previously disturbed urban area. The Project site is within a qualifying infill site that is currently developed with a vacant United States (U.S.) Post Office building (Post Office building), supporting uses, and an unused surface parking lot. Project implementation would involve partial demolition and rehabilitation the existing building and construction of six-story office building with ground-floor retail. Therefore, the Project fulfills the criteria regarding infill sites and employment-center uses. In addition, the Project site is approximately 0.1 mile from the Burlingame Caltrain station. The Burlingame Caltrain station is considered a major transit stop; therefore, the Project site is within a TPA.

The Project meets the three criteria above; therefore, this document does not consider aesthetics or parking in determining the significance of impacts under CEQA.

[7] A TPA is an area within 0.5 mile of a major transit stop.

II. Agricultural and Forestry Resources

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts on forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project, and the forest carbon measurement methodology provided in the forest protocols adopted by the California Air Resources Board. Would the Project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned for timberland production (as defined by Government Code Section 51104[g])?	☐	☐	☐	☒
d. Result in the loss of forestland or conversion of forestland to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment that, because of their location or nature, could result in the conversion of Farmland to non-agricultural use or the conversion of forestland to non-forest use?	☐	☐	☐	☒

Setting

The Project site is currently occupied by the unoccupied Post Office building and supporting features and, therefore, is fully developed. The California Department of Conservation 2018 map of important farmland identifies the city of Burlingame, including the Project site, as Urban and Built-up Land.[8]

[8] California Department of Conservation. 2019. *San Mateo County Important Farmland 2018*. Division of Land Resource Protection: Farmland Mapping and Monitoring Program. Available: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2018/smt18.pdf. Accessed: March 27, 2020.

Previous CEQA Documents

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, found no impacts related to agricultural and forestry resources. No mitigation measures were warranted.

Discussion

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

The Project site and all surrounding lands are identified as Urban and Built-up Land by the California Department of Conservation. No important farmland, including Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, exists within or adjacent to the Project site.[9] There is no potential for the Project to result in the conversion of important farmland to non-agricultural uses, and there would be ***no impact***.

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

The Project site is in the HMU District, which does not allow agricultural land uses. Accordingly, no agricultural land, including agricultural land under a Williamson Act or Farmland Security Zone contract, currently exists at the Project site.[10] Therefore, the Project would not result in a conflict with existing zoning for agricultural use or a Williamson Act contract, and there would be ***no impact***.

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

The site is not zoned for forestland, timberland, or timberland production.[11] Therefore, the Project would not conflict with zoning for such land, and accordingly, there would be ***no impact***.

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

As described above, there is no forestland within the Project site.[12] Therefore, the Project would not convert such land to an alternative use, and accordingly, there would be ***no impact***.

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9 California Department of Conservation. 2019. *San Mateo County Important Farmland 2018*. Division of Land Resource Protection: Farmland Mapping and Monitoring Program. Available: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2018/smt18.pdf. Accessed: March 27, 2020.

10 City of Burlingame. 2016. *Burlingame General Plan, Zoning*. Draft 1. June. Available: https://www.burlingame.org/ document_center/Zoning/ZoningMap-Burlingame-NE.pdf. Accessed: February 20, 2020.

11 Ibid.

12 Ibid.

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

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

Conclusion

The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The agricultural and forestry resources impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

III. Air Quality

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the Project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b. Result in a cumulatively considerable net increase in any criteria pollutant for which the Project region is a nonattainment area for an applicable federal or state ambient air quality standard?	☐	☐	☐	☒
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d. Result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people?	☐	☐	☐	☒

Setting

The Project site is in the city of Burlingame in San Mateo County, which is within the San Francisco Bay Area Air Basin (SFBAAB). Concentrations of ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead, and particulate matter (PM10 [particulate matter no more than 10 microns in diameter] and PM2.5 [particulate matter no more than 2.5 microns in diameter]) are commonly used as indicators of ambient air quality conditions. These pollutants are known as criteria pollutants and regulated by the U.S. Environmental Protection Agency (EPA) and California Air Resources Board (CARB) through national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS), respectively. The NAAQS and CAAQS limit criteria pollutant concentrations to protect human health and prevent environmental and property damage. Other pollutants of concern in the Project area are nitrogen oxides (NO_X) and reactive organic gases (ROGs), which are precursors to O_3, and toxic air contaminants (TACs), which can cause cancer and other human health concerns.

Ambient Criteria Pollutant Conditions and Regional Attainment Status

Criteria pollutant concentrations in San Mateo County and the SFBAAB are measured at several monitoring stations. The closest station to the Project site is the Redwood City station, which is approximately 10 miles southeast of the site. However, PM10 is not measured at the Redwood City station; therefore, data from the next-closest station that monitors PM10 (the San Francisco-Arkansas Street station) have been collected as well. Monitoring data in Table 3-1 show that the monitoring stations near the Project site experienced no violations of CO, NO_2, and national PM10 standards between 2016 and 2018, the most recent years with available data. There were two violations of the state 24-hour PM10 standard and six violations of the national 24-hour PM2.5 standard in 2017. There were 13 violations of the national 24-hour PM2.5 standard in 2018. Violations of the O_3 and particulate matter ambient air quality standards indicate that exposed individuals may experience certain health effects, including increased incidences of cardiovascular and respiratory ailments.

Table 3-1. Ambient Air Quality Monitoring Data at the Redwood City and San Francisco-Arkansas Street Monitoring Stations (2016–2018)

Pollutant Standards	2016	2017	2018
Ozone (O_3) at Redwood City station			
Maximum 1-hour concentration (ppm)	0.075	0.115	0.067
Maximum 8-hour concentration (ppm)	0.060	0.086	0.049
Fourth highest 8-hour concentration (ppm)	0.056	0.055	0.048
Number of days standard exceeded			
CAAQS 1-hour standard (> 0.09 ppm)	0	2	0
CAAQS 8-hour standard (> 0.070 ppm)	0	2	0
NAAQS 8-hour standard (> 0.070 ppm)	0	2	0
Particulate Matter (PM10) at San Francisco-Arkansas Street station			
Maximum state 24-hour concentration (µg/m^3)	29.0	77.0	43.0
Maximum national 24-hour concentration (µg/m^3)	35.7	75.9	40.9
National annual average concentration	8.8	11.0	10.0
Measured number of days standard exceeded			
CAAQS 24-hour standard (50 µg/m^3)	0	2	0
NAAQS 24-hour standard (150 µg/m^3)	0	0	0
Carbon Monoxide (CO) at Redwood City station			
Maximum 8-hour concentration (ppm)	1.1	1.4	1.7
Maximum 1-hour concentration (ppm)	2.2	2.8	2.5
Number of days standard exceeded			
NAAQS 8-hour standard (≥ 9 ppm)	0	0	0
CAAQS 8-hour standard (≥ 9.0 ppm)	0	0	0
NAAQS 1-hour standard (> 35 ppm)	0	0	0
CAAQS 1-hour standard (≥ 20 ppm)	0	0	0
Particulate Matter (PM2.5) at Redwood City station			
Maximum state 24-hour concentration (µg/m^3)	19.5	60.8	120.9
Maximum national 24-hour concentration (µg/m^3)	19.5	60.8	120.9
National annual average concentration	8.3	9.0	10.5
Measured number of days standard exceeded			
NAAQS 24-hour standard (> 35 µg/m^3)	0	6	13
Nitrogen Dioxide (NO_2) from Redwood City station			
Maximum state 1-hour concentration (ppm)	0.045	0.067	0.077
Annual average concentration (ppm)	0.009	0.010	0.010
Number of days standard exceeded			
CAAQS 1-hour standard (0.18 ppm)	0	0	0
NAAQS 1-hour standard (0.100 ppm)	0	0	0

Sources: California Air Resources Board. 2018. *iADAM: Air Quality Data Statistics.* Top 4 Summary. Available: https://www.arb.ca.gov/adam/topfour/topfour1.php. Accessed: April 2020.
U.S. Environmental Protection Agency. 2018. *Monitor Values Report*. Available: https://www.epa.gov/outdoor-air-quality-data/monitor-values-report. Accessed: April 2020.
Notes: ppm = parts per million; µg/m^3 = micrograms per cubic meter
An exceedance is not necessarily a violation.
State statistics are based on local conditions data; state statistics are based on California-approved samplers.
National statistics are based on standard conditions data. In addition, national statistics are based on samplers, using federal reference or equivalent methods.
State criteria for ensuring data are adequate for calculating valid annual averages are more stringent than national criteria.

Local monitoring data are used to designate areas as nonattainment, maintenance, attainment, or unclassified areas, according to the ambient air quality standards. San Mateo County is currently classified as a nonattainment area for the federal and state O_3 and PM2.5 standards and a nonattainment area for the state PM10 standard.[13,14]

Regulatory Setting

The Bay Area Air Quality Management District (BAAQMD) is responsible for ensuring that the NAAQS and CAAQS are met within the SFBAAB. BAAQMD manages air quality through a comprehensive program that includes long-term planning, regulations, incentives for technical innovation, education, and community outreach. The 2017 Clean Air Plan provides an integrated strategy to reduce O_3, particulate matter, TACs, and greenhouse gas (GHG) emissions in a manner that is consistent with federal and state air quality programs and regulations.

BAAQMD's CEQA Guidelines provide guidance for evaluating air quality impacts. The guidelines also contain thresholds of significance for O_3, CO, PM2.5, PM10, TACs, and odors.[15] As stated in Appendix G of the CEQA Guidelines, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make checklist determinations. Accordingly, BAAQMD's thresholds, as outlined in its CEQA Guidelines and summarized in Table 3-2, are used to evaluate the significance of air quality impacts associated with the Project, as described below.

Criteria Air Pollutants

BAAQMD's significance thresholds for criteria pollutants (ROGs, NO_X, PM10, and PM2.5), as shown in Table 3-2, are based on the stationary-source emissions limits of the federal Clean Air Act (CAA) and BAAQMD Regulation 2, Rule 2. The federal New Source Review program, created by the federal CAA, set emissions limits to ensure that stationary sources of air pollution are constructed in a manner that is consistent with attainment of the NAAQS. Similarly, to ensure that new stationary sources do not cause or contribute to a violation of the NAAQS, BAAQMD Regulation 2, Rule 2, requires any new source that emits criteria air pollutants above specified emissions limits to offset those emissions. Although the emission limits are adopted in the regulation to control stationary-source emissions, the amount of the emission is the key determining factor, regardless of source, when addressing the public health impacts of regional criteria pollutants. Therefore, the emissions limits are appropriate for the evaluation of land use development and construction activities as well as stationary sources. Those projects that would result in emissions that would be below the thresholds would not be considered projects that would contribute to an existing or projected air quality violation or result in a considerable net increase in criteria pollutant emissions.

[13] California Air Resources Board. 2018a. *Area Designation Maps/State and National*. October. Available: http://www.arb.ca.gov/desig/adm/adm.htm. Accessed: April 2020.

[14] U.S. Environmental Protection Agency. 2020. *Nonattainment Areas for Criteria Pollutants*. Available: https://www.epa.gov/green-book. Accessed: April 2020.

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

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

Pollutant	Construction	Operations
ROGs	54 pounds/day	54 pounds/day or 10 tons/year
NO_X	54 pounds/day	54 pounds/day or 10 tons/year
CO	—	Violation of CAAQS
PM10 (exhaust)	82 pounds/day	82 pounds/day or 15 tons/year
PM2.5 (exhaust)	54 pounds/day	54 pounds/day or 10 tons/year
PM10/PM2.5 (dust)	Best management practices	—
TACs (project level)	Increased cancer risk of 10.0 in 1 million, increased non-cancer risk more than 1.0 (hazard index), PM2.5 increase more than 0.3 microgram per cubic meter	Same as construction
TACs (cumulative)	Increased cancer risk of 100 in 1 million, increased non-cancer risk more than 10.0, PM2.5 increase more than 0.8 microgram per cubic meter at receptors within 1,000 feet	Same as construction
Odors	—	Five complaints per year, averaged over 3 years

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

Notes: CAAQS = California ambient air quality standards; CO = carbon monoxide; NO_X = nitrogen oxide; PM 2.5 = particulate matter no more than 2.5 microns in diameter; PM10 = particulate matter no more than 10 microns in diameter; ROGs = reactive organic gases; TACs = toxic air contaminants

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

Localized CO Hot Spots

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

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

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

Toxic Air Contaminants

BAAQMD's TAC thresholds are based on the cancer and non-cancer risk limits for the new and modified sources adopted in BAAQMD Regulation 2, Rule 5, and EPA's significant impact level (SIL) for PM2.5 concentrations. The EPA SIL is a measure of whether a source may cause or contribute to a violation of the NAAQS. Health risks due to TACs from construction, though temporary, can still result in substantial public health impacts because of increased cancer and non-cancer risks. Applying quantitative thresholds allows a rigorous standardized method to be used to determine when a construction project will cause a significant increase in cancer and non-cancer risks. The cumulative health risk thresholds are based on EPA guidance for conducting TAC analyses and making risk management decisions at the facility and community levels. The cumulative health risk thresholds are also consistent with the ambient cancer risk in the most pristine portions of the Bay Area and based on BAAQMD's recent regional modeling analysis as well as the non-cancer mandatory risk reduction levels for hot spots with toxic air.[16]

For evaluation purposes, TACs are separated into carcinogens and non-carcinogens, based on the nature of the physiological effects associated with exposure to the pollutant. Carcinogens are assumed to have no safe threshold below which health impacts would not occur; cancer risk is expressed as excess cancer cases per 1 million exposed individuals, typically over a lifetime of exposure. Non-carcinogenic substances differ in that there is generally assumed to be a safe level of exposure, below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis. Acute and chronic exposure to non-carcinogens is expressed as a hazard index, which is the ratio of expected exposure levels to an acceptable reference exposure level.[17] BAAQMD's TAC thresholds are presented in Table 3-2 and used to support the health risk assessment for the Project.

Odors

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

Previous CEQA Document Findings

The previous CEQA documents, including the Specific Plan IS/MND and the General Plan EIR, found less-than-significant impacts related to air quality with implementation of mitigation measures, SCAs, and/or General Plan goals and policies. The Specific Plan IS/MND determined that, through compliance with Mitigation Measure E-1/SCA-2, which requires individual projects to implement all appropriate control measures from the current adopted air quality plan, the Specific Plan would not conflict with the region's ability to achieve attainment with respect to O_3. In addition, with implementation of standard dust control measures specified in Mitigation Measure E-2/SCA-3, the Specific Plan would not exceed significance thresholds for air quality standards during construction.

[16] Bay Area Air Quality Management District. 2009. *California Environmental Quality Act Guidelines Update: Proposed Thresholds of Significance*. December. Available: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/proposed-thresholds-of-significance-dec-7-09.pdf?la=en. Accessed: April 2020.

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

The General Plan goals and policies establish an overall goal to protect residents from harmful construction and operational air emissions as a result of individual projects. The intent of these goals and policies, consistent with the 2017 Clean Air Plan control measures, is to reduce emissions and community risks, resulting in less-than-significant impacts. Per the General Plan EIR, the following goals and policies from the Healthy People and Healthy Places Element would apply to reduce impacts of future projects to less-than-significant levels: Policy HP-2.6, Policy HP-2.7, Policy HP-2.8, Policy HP-2.9, Policy HP-2.10, Policy HP-2.11, Policy HP-2.13, Policy HP-2.14, Policy HP-2.15, Goal HP-3, Policy HP-3.1, Policy HP-3.2, Policy HP-3.3, Policy HP-3.4, Policy HP-3.5, Policy HP-3.6, Policy HP-3.7, Policy HP-3.8, Policy HP-3.9, Policy HP-3.10, Policy HP-3.11, and Policy HP-3.12.

Discussion

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

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

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

As described below in Section XI, *Land Use and Planning*, the Project would be generally consistent with the goals and policies of the 2040 General Plan. In addition, the Project would develop land uses that would be consistent with the land uses permitted for the area under the 2040 General Plan. Because the Project's land uses are accounted for in the 2040 General Plan, the Project would be consistent with the growth anticipated in the 2017 Clean Air Plan.

The Project would be within 0.1 mile of high-quality public transit, including Caltrain and San Mateo County Transit District (SamTrans) bus routes. Furthermore, to be consistent with the City of Burlingame 2030 Climate Action Plan (see Section VIII, *Greenhouse Gas Emissions*), the Project would incorporate transportation demand management (TDM) strategies to achieve a 20 percent reduction in trip generation rates. Accordingly, the Project would not conflict with the 2017 Clean Air Plan; this impact, which was adequately addressed in the Previous CEQA Documents, would be ***less than significant***.

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

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

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

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

Construction

Construction criteria pollutant emissions would come from a variety of sources, including off-road construction equipment and on-road vehicles used by employees, vendors, and truck drivers. Criteria pollutant emissions generated during demolition of the building on the site and construction of the Project were quantified using the California Emissions Estimator Model (CalEEMod), version 2016.3.2. CalEEMod was run with model default values for some construction parameters and supplemented with data provided by the Project Sponsor for other construction parameters. The eight phases of construction, in sequential order, are demolition and clearing; historic building temporary relocation; excavation, shoring, and grading; foundation; building structure and exterior systems; historic building restoration; site improvements; and building exterior final closeout. Estimated unmitigated construction emissions would be short term, occurring over approximately 27 to 28 months. Table 3-3 summarizes the results of the emissions modeling. Model outputs are provided in Appendix A.

Table 3-3. Estimated Unmitigated Criteria Pollutant Emissions from Construction (pounds per day)

				PM10		PM2.5	
Construction Year	**ROGs**	**NO_X**	**CO**	**Dust**	**Exhaust**	**Dust**	**Exhaust**
2021	4	63	37	3	1	1	1
2022	3	55	38	27	1	7	1
2023	20	9	16	2	< 1	< 1	< 1
Maximum	20	63	38	27	1	7	1
BAAQMD Threshold	*54*	*54*	—	*BMPs*	*82*	*BMPs*	*54*
Exceed Threshold?	*No*	*Yes*	—	—	*No*	—	*No*

BAAQMD = Bay Area Air Quality Management District; BMPs = best management practices; CO = carbon monoxide; NO_X = nitrogen oxide; PM 2.5 = particulate matter no more than 2.5 microns in diameter; PM10 = particulate matter no more than 10 microns in diameter; ROGs= reactive organic gases

As shown in Table 3-3, construction of the Project would result in emissions that would exceed the BAAQMD threshold for NO_X; it would not exceed the threshold for any other pollutant. Exceedance of the NO_X threshold would be caused by exhaust emissions generated by off-road equipment used onsite (e.g., excavators, backhoes, bulldozers) as well as offsite truck trips (e.g., to haul construction material). These emissions, if left unmitigated, could contribute to ground-level formation of 0_3 in the SFBAAB, which, at certain concentrations, could contribute to short- and long-term human health effects.

Currently, San Mateo County does not attain the NAAQS or CAAQS for O_3. Certain individuals residing in areas that do not meet the ambient air quality standards, including San Mateo County, could be exposed to pollutant concentrations that could cause or aggravate acute and/or chronic health conditions (e.g., asthma). Although construction of the Project would contribute to future NO_X emissions, maximum daily construction-generated NO_X emissions would represent approximately 0.01 percent of total NO_X in the SFBAAB.[18,19]As previously discussed, the magnitude and location of any potential change in ambient air quality, and therefore changes in health consequences, from additional emissions cannot be quantified with a high level of certainty because of the dynamic and complex nature of pollutant formation and distribution. However, it is known that public health will continue to be affected in San Mateo County as long as the region fails to attain the NAAQS or CAAQS. In addition, demolition and earthmoving activities would generate fugitive dust. The amount of dust generated would be highly variable and dependent on the size of the area disturbed at any given time, the amount of activity, soil conditions, and meteorological conditions. BAAQMD considers fugitive dust emissions to be potentially significant without implementation of BMPs to control fugitive dust onsite. Consequently, dust emissions generated by Project construction activities would be potentially significant.

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

BAAQMD's CEQA Guidelines consider fugitive dust impacts to be less than significant with application of BMPs. If BMPs are not implemented, then dust impacts would be potentially significant. Therefore, Specific Plan SCA-3, which includes BMPs, would be required and implemented to reduce impacts from construction-related fugitive dust emissions, including any cumulative impacts. Mitigated construction emissions with implementation of SCA-3 are shown in Table 3-4. With the BMPs, dust emissions would be reduced, and the impact would be ***less than significant.*** This impact was adequately addressed in the Previous CEQA Documents.

[18] NO_X emissions reported in the Clean Air Plan totaled 300 tons per day. Maximum Project-generated NO_X emissions would be 63 pounds per day, which equates to 0.03 ton per day.

[19] Bay Area Air Quality Management District. 2017b. *Clean Air Plan 2017.* Available: https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed: April 2020.

Table 3-4. Estimated Mitigated Criteria Pollutant Emissions from Construction (pounds per day)[a]

				PM10		PM2.5	
Construction Year	**ROGs**	**NO_X**	**CO**	**Dust**	**Exhaust**	**Dust**	**Exhaust**
2021	2	43	48	3	< 1	1	< 1
2022	2	40	49	27	< 1	7	< 1
2023	20	2	18	2	< 1	< 1	< 1
Maximum	20	43	49	27	< 1	7	< 1
BAAQMD Threshold	*54*	*54*	—	*BMPs*	*82*	*BMPs*	*54*
Exceed Threshold?	*No*	*No*	—	—	*No*	—	*No*

BAAQMD = Bay Area Air Quality Management District; BMPs = best management practices; CO = carbon monoxide; NO_X = nitrogen oxide; PM 2.5 = particulate matter no more than 2.5 microns in diameter; PM10 = particulate matter no more than 10 microns in diameter; ROGs= reactive organic gases

a. Mitigated emissions account for implementation of Mitigation Measures AQ-1 and SCA-3.

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

Mitigation Measure AQ-1: Utilize Tier 4 Construction Equipment. The Project Sponsor shall ensure that all off-road diesel-powered equipment used during construction is equipped with engines that meet EPA Tier 4 "final" emission standards.

Operation

The criteria pollutant emissions that would be generated during Project operations were quantified using CalEEMod and EMFAC2017, with average daily traffic considered. Long-term emissions would be caused primarily by vehicle trips generated by future occupants, with additional emissions from area sources (e.g., cleaning supplies, paint applications, landscaping equipment) and energy sources. Stationary-source emissions would be caused by intermittent use of a diesel-powered emergency generator.

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

Table 3-5. Net (Project minus Existing) Operational Emissions (pounds per day)

				PM10			PM2.5		
Emission Source	**ROG**	**NO_X**	**CO**	**Dust**	**Exhaust**	**Total**	**Dust**	**Exhaust**	**Total**
Area	4	< 1	< 1	—	< 1	< 1	—	< 1	< 1
Energy	4	41	34	—	3	3	—	3	3
Mobile	2	6	24	8	< 1	8	2	< 1	2
Stationary	<1	1	1	—	< 1	< 1	—	< 1	< 1
Total	11	47	58	8	3	11	2	3	5
BAAQMD Threshold	*54*	*54*	—	—	—	*82*	—	—	*54*
Exceed Threshold?	*No*	*No*	—	—	—	*No*	—	—	*No*

As shown in Table 3-5, operation of the Project would not generate ROG, NO_X, or particulate matter that would be in excess of BAAQMD's numeric thresholds. The Project would have a less-than-significant impact on air quality during operation. It would not contribute a significant level of air pollution that would degrade regional air quality within the SFBAAB. The Impact would be ***less than significant***. This impact was adequately addressed in the Previous CEQA Documents.

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

Sensitive land uses are defined as locations where human populations, especially children, seniors, and sick persons, are located and where there is reasonable expectation of continuous human exposure, according to the averaging period for the air quality standards (i.e., 24 hours, 8 hours). Per BAAQMD, typical sensitive receptors are residences, hospitals, and schools. Parks and playgrounds where sensitive receptors (e.g., children and seniors) are present would also be considered sensitive receptors.[20] The nearest sensitive land use are the second-story apartments adjacent to the Project site. Notable sensitive land uses in proximity of the Project site are listed in Table 3-6.

Table 3-6. Nearest Sensitive Land Uses in Proximity to the Project Site

Land Use	Address	Receptor Type	Distance from Project Site (feet)	Direction from Project Site
Second-story apartments	238 Park Road and 1213 Burlingame Avenue	Residential	< 50	North
Second-story apartments	268 Lorton Avenue	Residential	50	East
TALK	1209 Howard Avenue	Children's speech pathologist	230	South
St. Catherine of Siena	1300 Bayswater Avenue	High school	200	Southwest
UMC Nursery School	1443 Howard Avenue	Child care center	675	Southwest

The primary pollutants of concern with regard to health risks for sensitive receptors are criteria pollutants (including localized CO hot spots), asbestos, diesel particulate matter, and localized PM2.5. Each of these pollutants, including the potential impact on nearby receptors, is analyzed in the paragraphs that follow.

Criteria Pollutants

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

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

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

As shown in Table 3-5, operation of the Project would not generate regional criteria pollutants or precursors that would exceed BAAQMD's thresholds of significance. Consequently, the impact from operational criteria pollutant emissions would be ***less than significant***. For criteria air pollutants during operations, the Project would not expose receptors to substantial pollutant concentrations or risks. This impact was adequately addressed in the Previous CEQA Documents.

Localized CO Hot Spots

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

Peak-hour traffic volumes at 12 intersections in the Project vicinity were analyzed to determine whether the Project would meet BAAQMD screening criteria. Maximum traffic volumes at the intersections under all scenarios would be well below the 44,000-vehicle-per-hour screening threshold. Also, intersection traffic volumes under all scenarios would be below the 24,000-vehicle-per-hour screening threshold for areas where vertical and/or horizontal mixing is substantially limited; therefore, there would be no exceedance of either the non-limited mixing threshold (44,000 vehicles per hour) or the limited vertical/horizontal mixing threshold (24,000 vehicles per hour).

The City/County Association of Governments of San Mateo County is the presiding congestion management agency. The Congestion Management Program roadway system in San Mateo County comprises 16 intersections but does not include the 12 intersections analyzed as part of the Project.[21] Furthermore, all 12 intersections would operate at an acceptable level of service of C or better under all conditions, both with and without the Project.[22] Consequently, the Project would be consistent with the applicable congestion management plan and would not result in an exceedance of BAAQMD screening criteria. Furthermore, CO concentrations would not exceed the CAAQS. This impact, which was adequately addressed in Previous CEQA Documents, would be ***less than significant***.

Asbestos

Asbestos is a naturally occurring mineral that was once used in building construction because of its heat resistance and strong insulating properties. Exposure to asbestos, however, has been shown to cause many disabling or fatal diseases, including lung cancer, mesothelioma, and pleural plaques.

[21] City/County Association of Governments of San Mateo County. 2020. *San Mateo County Congestion Management Program 2019*. April. Available: https://ccag.ca.gov/wp-content/uploads/2020/04/2019-CMP-Final-040920.pdf. Accessed: August 6, 2020.

[22] Hexagon Transportation Consultants, Inc. 2020. *220 Park Road Draft Transportation Impact Analysis.*

Demolition of the buildings on the Project site may expose workers and nearby receptors to asbestos if the material was used during construction of the existing building. However, the Project would comply with BAAQMD Regulation 11, Rule 2, Asbestos, Demolition, Renovation, and Manufacturing. The purpose of this rule is to control emissions of asbestos to the atmosphere during demolition and building renovation. Because the Project Sponsor would be required to control asbestos emissions according to BAAQMD regulations, impacts associated with asbestos emissions would be ***less than significant***. This impact was adequately addressed in the Previous CEQA Documents.

Construction-Generated Diesel Particulate Matter and Localized PM2.5

Cancer health risks associated with exposure to diesel particulate matter are typically associated with chronic exposure (i.e., a 30-year exposure period). BAAQMD has determined that construction activities occurring more than 1,000 feet from a sensitive receptor most likely do not pose a significant health risk. As shown in Table 3-6, there are sensitive land uses near the Project site. Accordingly, a health risk assessment (HRA) was undertaken to assess inhalation cancer risks, non-cancer hazard impacts, and PM2.5 concentrations, as recommended in BAAQMD's CEQA Guidelines.

During construction activities, diesel particulate matter and PM2.5 exhaust emissions would be generated by heavy-duty off-road equipment as well as on-road vehicles. Fugitive dust emissions would be generated during grading and excavation. The HRA was prepared consistent with guidance from EPA, the California Environmental Protection Agency, the Office of Environmental Health Hazard Assessment, and BAAQMD. More specifically, the HRA relied on EPA's most recent dispersion model, AERMOD (version 19191). Calculations of acute and chronic cancer risks relied on the assessment values developed from the Office of Environmental Health Hazard Assessment's *Air Toxics Hot-spots Program, Risk Analysis Guidelines;*[23] BAAQMD's *Recommended Methods for Screening and Modeling Local Risks and Hazards*;[24] and BAAQMD's *Air Toxics NSR Program Health Risk Assessment Guidelines*.[25] Refer to Appendix A for more detailed modeling assumptions and AERMOD outputs.

Table 3-7 presents the health risks for the receptor that would receive the highest concentrations of construction-related diesel particulate matter and PM2.5 and, therefore, have the greatest potential health risks from the Project. As shown in Table 3-7, unmitigated construction emissions would result in a significant increase in the cancer risk at the identified receptor, although the chronic hazard index and PM2.5 concentration would not exceed the BAAQMD's significance thresholds. The cancer risk impact would be well above the threshold of 10 per million; consequently, the Project's emissions generated by construction activities would be potentially significant.

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[23] Office of Environmental Health Hazard Assessment. 2015. *Air Toxics Hot-spots Program, Risk Analysis Guidelines*. Guidance Manual for Preparation of Health Risk Assessments. Available: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf. Accessed: August 5, 2020.

[24] Bay Area Air Quality Management District. 2012. *Recommended Methods for Screening and Modeling Local Risks and Hazards.* Available: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/risk-modeling-approach-may-2012.pdf?la=en. Accessed: August 5, 2020.

[25] Bay Area Air Quality Management District. 2016. *Air Toxics NSR Program Health Risk Assessment Guidelines*. Available: http://www.baaqmd.gov/~/media/files/planning-and-research/permit-modeling/hra_guidelines_12_7_2016_clean-pdf.pdf. Accessed: August 5, 2020.

Table 3-7. Estimated Project-Level Cancer and Chronic Hazard Risks from Unmitigated Construction-Related Diesel Particulate Matter and PM2.5 Exhaust Emissions

Receptor	Cancer Risk (cases per million)	Non-Cancer Hazard Index	Annual PM2.5 Concentration (µg/m³)
Maximally affected residence (238 Park Road)	98.6	< 0.1	0.2
Significance Threshold	*10.0*	*1.0*	*0.3*
Exceed Threshold?	*Yes*	*No*	*No*

µg/m³ = micrograms per cubic meter; PM 2.5 = particulate matter no more than 2.5 microns in diameter
Exceedances denoted with underline.

With implementation of Mitigation Measure AQ-1, off-road construction equipment would be outfitted with Tier 4 "final" engines at the Project site. This measure would reduce TAC emissions (i.e., diesel particulate matter) and therefore the corresponding health risks and pollutant concentrations at sensitive receptors. Table 3-8 presents the cancer risk, hazard index, and PM2.5 concentration for construction with implementation of Mitigation Measure AQ-1.

Table 3-8. Estimated Project-Level Cancer and Chronic Hazard Risks from Mitigated Construction-Related Diesel Particulate Matter and PM2.5 Exhaust Emissions

Receptor	Cancer Risk (cases per million)	Non-Cancer Hazard Index	Annual PM2.5 Concentration (µg/m³)
Maximally affected residence	8.4	< 0.1	0.1
Significance Threshold	*10.0*	*1.0*	*0.3*
Exceed Threshold?	*No*	*No*	*No*

As shown in Table 3-8, with implementation of Mitigation Measures AQ-1, the cancer risk would be below BAAQMD's significance thresholds. Therefore, impacts would be ***less than significant with mitigation.*** This impact was adequately addressed in the Previous CEQA Documents.

Operational Diesel Particulate Matter and Localized PM2.5

The Project would contribute operational diesel particulate matter from use of the proposed emergency generator. The generator would operate for approximately 20 minutes on testing days; total operating time could be up to 18 hours per year. The hours of operation would be consistent with the testing limits for generators described in CARB's Airborne Toxic Control Measure for Stationary Compression Ignition Engines and Section 330.3 of BAAQMD Regulation 9, Rule 8. BAAQMD's Permit Handbook, Section 2.3.1, indicates that "typically, any stationary diesel engines over 50 horsepower will require a risk screening analysis." BAAQMD Regulation 2, Rule 5, Section 302, specifies that an Authority to Construct permit or Permit to Operate from BAAQMD will be denied if any new and modified sources of TACs, including generators, in excess of 50 horsepower result in cancer risks in excess of 10.0 in 1 million or a hazard index of 1.0. Furthermore, BAAQMD Regulation 2, Rule 5, Section 302, is cited as evidence in support of BAAQMD's health risk thresholds in the 2017 BAAQMD CEQA Guidelines. Therefore, generator testing would not lead to significant health risks. Impacts, which were adequately addressed in the Previous CEQA Documents, would be ***less than significant***.

Cumulative Diesel Particulate Matter, PM2.5 Exhaust, and Fugitive Dust

According to BAAQMD's CEQA Guidelines, combined risk levels should be determined for all TAC sources within 1,000 feet of a project site, and the combined risk levels should be compared to BAAQMD's cumulative health risk thresholds.[26]

Nearby TAC sources, as well as Project construction, could contribute to a cumulative health risk for sensitive receptors near the Project site. BAAQMD's inventory of stationary health risks and distance multiplier tool[27,28] were used to estimate excess impacts from existing stationary sources. Geographic information system (GIS) raster files provided by BAAQMD were used to estimate roadway and railway source emissions.[29] The methods used to estimate Project-related TAC emissions are described above and in Appendix A. The results of the cumulative impact assessment are summarized in Table 3-9 for the three sensitive receptors from Table 3-6 that would be most affected by Project pollutant concentrations. These three sensitive receptor locations represent the areas in proximity to the Project where pollutant concentrations would be the highest. To evaluate cumulative impacts, it is important to consider several affected areas. This is because one area may be, for example, the third-most-affected area from Project construction but experience the highest concentration of pollutants from existing sources, resulting in the highest overall cumulative impacts. Therefore, Table 3-9 shows the range of cumulative impacts that nearby sensitive receptors would experience, based on the Project's contribution and the contribution of individual existing sources located near each area. Individual background contributions from existing sources are included in Appendix A.

As shown in Table 3-9 for the mitigated scenario, the cumulative cancer risk, hazard index, and PM2.5 concentration at the three most-affected receptors would not exceed BAAQMD thresholds for cumulative impacts. Although the cancer risk at 238 Park Road would exceed the 100 per million cancer risk threshold in an unmitigated scenario, Mitigation Measure AQ-1 would already be required, as noted in Item III(a), above, to reduce NO_X emissions to below the threshold. Accordingly, the contribution of the Project's construction emissions would not contribute to a cumulatively considerable impact. This impact, which was adequately addressed in Previous CEQA Documents, would be ***less than significant with mitigation***.

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[26] Bay Area Air Quality Management District. 2017a. *California Environmental Quality Act Air Quality Guidelines*. May. Available: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: August 5, 2020.

[27] Bay Area Air Quality Management District. 2020a. *Permitted Stationary Sources Risk and Hazards.* Available: https://baaqmd.maps.arcgis.com/apps/webappviewer/index.html?. Accessed: September 2020.

[28] Bay Area Air Quality Management District. 2020b. *Health Risks Calculator with Distance Multipliers.* Available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools. Accessed: September 2020.

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

Table 3-9. Cumulative Toxic Air Contaminant Health Risks from Project and Background Sources at the Maximally Affected Receptor

Sources	Increased Cancer Risk (per million) (unmitigated/ mitigated)	Non-Cancer Hazard Index (unmitigated/ mitigated)	PM2.5 Exposure (µg/m³) (unmitigated/ mitigated)
238 Park Road			
Existing Pollutant Sources			
Stationary	4.4	< 0.1	< 0.1
Roadways	6.4	NA	0.1
Railroad	5.8	NA	< 0.1
Project Construction	98.6/8.4	< 0.1/< 0.1	0.2/0.1
Total Cumulative	115.2/25.0	0.1/0.1	0.4/0.2
268 Lorton Avenue			
Existing Pollutant Sources			
Stationary	3.5	< 0.1	< 0.1
Roadways	7.0	NA	0.2
Railroad	9.0	NA	< 0.1
Project Construction	36.9/3.2	< 0.1/< 0.1	0.1/< 0.1
Total Cumulative	56.3/22.7	< 0.1/< 0.1	0.3/0.2
1209 Howard Avenue			
Existing Pollutant Sources			
Stationary	5.4	< 0.1	< 0.1
Roadways	6.4	NA	0.1
Railroad	5.9	NA	< 0.1
Project Construction	23.5/2.0	< 0.1/< 0.1	0.1/< 0.1
Total Cumulative	41.1/19.7	< 0.1/< 0.1	0.2/0.2
BAAQMD Thresholds	*100*	*10.0*	*0.8*
Exceeds Threshold?	*Yes (238 Park Road) /No*	*No/No*	*No/No*

Notes:
µg/m³ = micrograms per cubic meter
Exceedances denoted with underline.
[a.] Exceedance of threshold is due to existing ambient sources located within the vicinity of the Project area.

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

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

facilities, and manufacturing plants.[30] Odor impacts on residential areas and other sensitive receptors, such as hospitals, day-care centers, and schools, warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, work sites, and commercial areas.

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

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to air quality than those identified previously. Implementation of existing rules and regulations governing air quality, including Specific Plan SCA-3 and the City's General Plan goals and policies, would ensure that potential impacts associated with construction emissions would be less than significant. In addition, implementation of Mitigation Measure AQ-1, specific to the Project, which would require the use of EPA-approved Tier 4 "final" engines in off-road equipment during construction, would reduce emissions to below the BAAQMD threshold for NO_X emissions. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The air quality impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

[30] California Air Resources Board. 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. April.

IV. Biological Resources

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Setting

The Project site and surrounding area are characterized by dense urban development, with minimal amounts of landscape vegetation. The Project site includes 1.28 acres of land that is currently occupied by the vacant Post Office building. The existing structures are surrounded by ruderal vegetation and 13 trees of the southern magnolia and evergreen pear species. Of these trees, nine are considered "protected trees" by City Municipal Code Section 11.06.020.[31] Because the Project site is developed, it

[31] Arbor Resources. 2019. *Tree Survey Report: 220 Park Road, Burlingame, California.* February 1.

does not contain natural land cover or communities, protected wetlands and waters,[32] riparian habitat, or other sensitive natural communities.[33] The onsite ornamental vegetation is not considered a sensitive natural community. Burlingame Creek is culverted beneath the existing City-owned parking lot, but does not constitute a biological feature. No other water features or waterways are on or within the vicinity of the Project site. The nearest public parks, Washington Park and Pershing Park, are approximately 0.15 mile northeast and 0.30 mile southwest of the Project site, respectively. The nearest water bodies, a concrete channel and riparian area, are approximately 0.15 mile northeast and 0.5 mile west of the Project site, respectively.

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

- A California Department of Fish and Wildlife (CDFW) California Natural Diversity Database[34] (CNDDB) species list query for the Project site and a 1-mile buffer area
- A California Native Plant Society (CNPS)[35] species list query for the U.S. Geological Survey (USGS) San Mateo (3712253) 7.5-minute series quadrangles
- A U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC)[36] query for the Project site
- The 2010 Specific Plan IS/MND[37]
- The USFWS National Wetland Inventory and EPA data for the identification of waters and wetlands[38, 39]
- Google Earth for aerial imagery[40]

Previous CEQA Documents

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, found less-than-significant impacts related to biological resources with implementation of mitigation measures, SCAs, and/or General Plan goals and policies. Both Previous CEQA Documents noted that the planning areas are

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32 U.S. Fish and Wildlife Service. 2020. *National Wetland Inventory Wetland Mapper*. Available: https://www.fws.gov/wetlands/. Accessed: August 3, 2020.

33 California Department of Fish and Wildlife. 2020. *California Sensitive Natural Communities*. Available: https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities. Accessed: August 3, 2020.

34 California Department of Fish and Wildlife. 2020. *California Natural Diversity Database RareFind Records Search.* RareFind Version 5. Available: https://www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data. Accessed: August 10, 2020.

35 California Native Plant Society. 2020. *Online Inventory of Rare and Endangered Plants of California*. Available: http://www.rareplants.cnps.org/advanced.html. Accessed: August 10, 2020.

36 U.S. Fish and Wildlife Service. 2020. *IPaC Species List.* Available: https://ecos.fws.gov/ipac/. Accessed: August 10, 2020.

37 City of Burlingame. 2010. *Draft Burlingame Downtown Specific Plan Initial Study/Mitigated Negative Declaration*. Available: https://www.burlingame.org/document_center/Planning/General%20and%20Specific%20Plans/Draft%20Initial%20Study%20Mitigated%20Negative%20Declaration.pdf. Accessed: August 3, 2020.

38 U.S. Fish and Wildlife Service. 2020. *National Wetland Inventory Wetland Mapper*. Available: https://www.fws.gov/wetlands/. Accessed: August 3, 2020.

39 U.S. Environmental Protection Agency. 2020. *WATERS GeoViewer*. Available: https://www.epa.gov/waterdata/waters-geoviewer. Accessed: August 3, 2020.

40 Google Earth Pro. 2020. Aerial imagery: 220 Park Road, 37°34'41.71"N and 122°20’45.02"W. Accessed: August 3, 2020.

largely built out and that there are no areas of new development that could significantly affect sensitive biological resources. The Specific Plan IS/MND identified potentially significant impacts related to wetlands, wildlife movement, and compliance with biological resources regulations. With implementation of Mitigation Measure G-1/SCA-13, Mitigation Measure G-2/SCA-14, and Mitigation Measure G-3/SCA-15, impacts on biological resources under the Specific Plan would be less than significant.

The General Plan EIR found less-than-significant impacts related to biological resources. The following goals and policies from the Healthy People and Healthy Places Element were identified to reduce impacts on biological resources: Goal HP-5, Policy HP-5.1, Policy HP-5.2, Policy HP-5.3, Policy HP-5.4, Policy HP-5.5, Policy HP-5.6, Policy HP-5.7, Policy HP-5.8, Policy HP-5.9, Policy HP-5.10, Policy HP-5.11, Policy HP-5.12, Policy HP-5.13, Policy HP-5.14, and Policy HP-5.15. No one established regulation, goal, policy, or implementation measure would be expected to completely reduce or avoid an identified potential biological resources impact. However, the combined mitigating benefits of required regulations and policies listed in the General Plan EIR would result in a less-than-significant biological resources impact. No mitigation measures were warranted.

Discussion

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

The Project site and surrounding area are completely developed, and no sensitive natural community is present on the site or in the immediate vicinity. Special-status species are not anticipated to occur, with the exception of the hoary bat (*Lasiurus cinereus*) and nesting migratory birds. Although hoary bat may forage over the area on occasion, the Project site does not provide suitable foraging or breeding habitat for the species. Hoary bats are sensitive to disturbance and require a mosaic of habitat, which is not supported by the developed nature of the downtown area. In addition, because of the abundance of similar landscaped foraging habitat in the surrounding area, it is unlikely that hoary bat would be present at the Project site.

The structures and landscaping (e.g., shrubs and trees) on or near the Project site offer suitable nesting habitat for migratory birds and raptors, which are protected under the Migratory Bird Treaty Act and California Fish and Game Code Section 3503. The Project would remove all nesting and roosting habitat (i.e., vegetation, trees, structures) within the Project site. A potentially significant impact could occur if migratory bird individuals were injured or killed during tree removal and/or building demolition, substantially affected by construction noise, or affected by light during Project operations at night.

To reduce potential impacts on special-status specifics, Specific Plan SCA-14 would require pre-construction surveys for nesting birds, avoidance during the nesting period to the extent feasible, and avoidance of nesting birds found during pre-construction surveys. Furthermore, Specific Plan Mitigation Measure J-1/SCA-19 would require implementation of noise reduction measures to minimize noise generated during construction, which would also serve to reduce potential impacts on natural communities. Existing regulations, including the California Building Standards Code (Title 24, Building Energy Efficiency Standards) and City Municipal Code Section 18.16.030, require lighting designs to minimize impacts from light and glare. Implementation of the Specific Plan's SCA-14 and SCA-19, as well as compliance with existing lighting regulations, would ensure that nesting migratory birds would be protected. Impacts on special-status species would be ***less than significant***. This impact was adequately addressed in the Previous CEQA Documents.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? (No Impact)

The Project site and surrounding area are completely developed with mixed-use commercial, office, retail, and residential uses. No riparian habitat or other sensitive natural community is present on the Project site or in the immediate vicinity. The nearest riparian habitat is approximately 0.5 mile west of the Project site. Therefore, the Project would have ***no impact*** on riparian habitat or other sensitive natural communities, which were adequately addressed in Previous CEQA Documents.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means? (No Impact)

No federally protected wetlands or other jurisdictional waters are present on the Project site or in the immediate vicinity. The nearest federally protected wetland in proximity to the Project site is the riverine habitat approximately 0.15 mile northeast of the site, in an area associated with a concrete channel. [41] The Project site is separated from this habitat by dense urban development, including multiple paved roads. Therefore, the Project would have ***no impact*** on state or federally protected wetlands, which were adequately addressed in Previous CEQA Documents.

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

No wetlands or running waters are present in the vicinity of the Project site; therefore, the Project would not affect fish movement. All Project activities would occur within an already-developed footprint that is surrounded by development. Therefore, the Project would not result in fragmentation within natural habitats that would interfere with the movement of wildlife. Any common urban-adapted species that currently move through the Project site would continue to be able to do so following construction.

Wildlife corridors are described as pathways or habitat linkages that connect discrete areas of natural open space that would otherwise be separated or fragmented by topography, changes in vegetation, or other natural or manmade obstacles, such as urbanization. Because the Project site, as well as the surrounding area, is developed, it does not connect directly to areas of natural open space. Nonetheless, the likelihood exists for trees on the Project site to be used by migratory birds. A potentially significant impact could occur if a substantial number of nesting migratory birds were injured or killed during construction or operation of the Project.

As described above in Impact IV(a), impacts on nesting birds, including migratory birds, during construction would be minimized through implementation of SCA-14 and SCA-19, which require compliance with existing lighting regulations, implementation of pre-construction surveys for nesting birds, avoidance of the nesting period to the extent feasible, avoidance of nesting birds found during pre-construction surveys, lighting impacts to be reduced, and measures to be implemented to reduce noise impacts. The impact on migratory birds due to construction would be ***less than significant*** with implementation of Specific Plan SCA-14 and SCA-19. This impact was adequately addressed in the

[41] U.S. Fish and Wildlife Service. 2020. *National Wetland Inventory Wetland Mapper*. Available: https://www.fws.gov/wetlands/. Accessed: August 3, 2020.

Previous CEQA Documents. However, operation of the Project would include new lighting and a new vertical structure with potentially reflective surfaces. The new lighting and the new surfaces of the building could misdirect or confuse migratory birds, resulting in disruption of natural behavioral patterns and possible injury or death from exhaustion or collisions with buildings. The potential for these types of impacts could be heightened because of the Project's location within the Pacific Flyway, a bird migration route, and the site's proximity to San Francisco Bay. Impacts on migratory birds from proposed buildings and increased lighting levels would be potentially significant. Mitigation Measure BIO-1, specific to this Project, would require implementation of design standards that would reduce hazards for birds. The impact on migratory birds due to operation of the Project would be ***less than significant after mitigation***.

Mitigation Measure BIO-1: Implement Bird-safe Design Standards into Project Buildings and the Lighting Design. The Project Sponsor, or contractor, shall implement the following measures to minimize hazards for birds:

- Reduce large areas of transparent or reflective glass, or utilize fritted glass on larger areas of glass
- Locate water features, trees, and bird habitat away from building exteriors to reduce reflection
- Reduce or eliminate the visibility of landscaped areas behind glass
- Turn non-emergency lighting off at night, especially during bird migration season (February–May and August–November)
- Include window coverings that adequately block light transmission from rooms where interior lighting is used at night and install motion sensors or controls to extinguish lights in unoccupied spaces
- Design and/or install lighting fixtures that minimize light pollution, including light trespass, over-illumination, glare, light clutter, and skyglow, and use bird-friendly colors for lighting when possible. The City of San Francisco's *Standards for Bird-safe Buildings*[42] provides an overview of building design and lighting guidelines to minimize bird/building collisions that could be used to guide the Project Sponsor.

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

City Municipal Code Section 11.06.020 defines a "protected tree" as any tree with a circumference of 48 inches or more when measured 54 inches above natural grade. A total of 13 trees were documented on the Project site. Including offsite trees, approximately 11 to 14 trees would be removed during construction. The species of the trees to be removed include southern magnolias and evergreen pear. Of the 13 trees on the Project site, nine are considered protected trees.

The Project Sponsor would be required to adhere to Specific Plan Mitigation Measure G-3/SCA-15, which requires the Project Sponsor to obtain permits before removing protected trees and compensate for the removal of protected trees. In accordance with City Municipal Code Chapter

[42] City and County of San Francisco. 2011. *Standards for Bird-safe Buildings*. San Francisco Planning Department. July 14. Available: http://www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Standards_for_Bird_Safe_Buildings_7-5-11.pdf. Accessed: September 11, 2020.

11.06, *Urban Reforestation and Tree Protection*, and Chapter 11.04, *Street Trees,* five to eight new trees would be planted as a part of the Project. With implementation of Specific Plan SCA-15, the Project would not conflict with any local policies or ordinances that protect biological resources. The impact, which was adequately addressed in the Previous CEQA Documents, would be ***less than significant***.

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

The Project site is not part of or near an adopted or proposed habitat conservation plan (HCP) or natural community conservation plan (NCCP) or any other local, regional, or state HCP. The nearest area covered by an HCP is the San Bruno Mountain HCP, which is more than 5 miles north of the Project site. Therefore, the Project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP, and ***no impact*** would occur. This impact was adequately addressed in Previous CEQA Documents.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to biological resources than those identified previously. Implementation of existing rules and regulations governing biological resources, including Specific Plan SCA-14, SCA-15, and SCA-19 and the City's General Plan goals and policies, would ensure that potential impacts associated with biological resources would be less than significant. In addition, implementation of Mitigation Measures BIO-1, specific to the Project, would reduce impacts on migratory birds from potential building hazards to less than significant. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The biological resource impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

V. Cultural Resources

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☐	☒
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	☒

Setting

The Project site contains the Post Office building, located at 220 Park Road. The one-story building, constructed in 1941–1942, expresses elements of the Spanish Eclectic and Art Deco architectural styles. Constructed of concrete and clad in smooth stucco, the building's symmetrical, irregular plan is formed by a primary volume with a flat roof and office wings at the north and south façades. The wings are oriented parallel to Park Road and Lorton Avenue and feature gabled roofs with a shallow pitch; the roofs are covered in rounded clay tiles. Public entrances to the building are located at the west ends of the Park Road and Lorton Avenue façades and are accessible from broad landings. The entrances contain paired bronze doors that are glazed and deeply recessed. Transom windows feature bronze eagle reliefs. Above each entrance is *The Letter*, a cast stone relief designed by James L. Hansen that depicts a seated woman clasping a piece of mail. Windows at the building's north, west, and south façades are evenly spaced and contain multi-lite metal sashes. Below each window is a panel with a molded eagle relief. The east façade fronts a paved vehicular drive and features a series of large metal-sash windows and a sheltered loading dock. A non-original garage constructed of concrete masonry is situated near the west façade of the building.

The main entrances at Park Road and Lorton Avenue provide access to vestibules and the public lobby, which contains a variety of elements that are original to the building, including marble wall panels, hanging light fixtures, lobby furniture, service windows, and terrazzo floors. Remaining interior spaces generally lack features that date to the building's construction in 1941.

Historical Overview

Following the 1929 stock market crash, the American economy suffered a massive surge of unemployment and economic devastation through the 1930s. To stimulate the nation's economy and create jobs, the United States government developed a suite of public works programs and projects known as the New Deal. One of these programs was the Public Works Administration (PWA), established under the National Industrial Recovery Act of 1933. The PWA received funding for the construction of federal buildings, including post offices. The Treasury Department's Office of the Supervisory Architect was authorized to hire external architects to design post offices, and the PWA utilized this mechanism as a work relief initiative. For most PWA post office interiors, architects used

the Treasury Department's standardized floor plans, known as "Cabinet Sketches," which typically included a public lobby and similar workroom layout. However, architects were able to individualize some design aspects, such as materials and decorative features. In 1939, the Federal Works Administration took over management of federal building construction from the Treasury Department. Federal post office construction remained active until the United States entered World War II.[43]

Among the post offices designed and constructed through the PWA was the Post Office building at 220 Park Road. The Post Office building was designed by Los Angeles architect Ulysses Floyd Rible, with Louis A. Simon serving as supervising architect and Neal A. Melick as supervising engineer. Between 1933 and 1939, Simon held the position of supervising architect at the Treasury Department and was involved in most PWA projects. Begun in 1941 and completed the following year, the building incorporates the standardized interior plan commonly used in PWA post office projects, which is seen through its incorporation of a public lobby, service counter, workroom, lobby boxes, and loading bays.[44] The exterior of the Post Office building features elements of the Spanish Eclectic and Art Deco architectural styles and showcases the characteristics of New Deal–era civic institutional design, including public artworks, such as James L. Hansen's relief, *The Letter*, above both the Park Road and Lorton Avenue entrances.

Past Evaluations and Property Significance

In 2008, Carey & Co. completed an inventory of historic resources in Burlingame in support of the Specific Plan. The inventory identified 23 built-environment resources in Burlingame's downtown district that appeared eligible for listing in the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR); the inventory served as the list of historical resources for the purposes of CEQA review of the Specific Plan. Carey & Co. found that the Post Office building at 220 Park Road appeared eligible for NRHP and CRHR listing under Criteria C/3 (Architecture/Design) "as a distinct example of Art Deco–style architecture and representing a transition toward a broader stylistic range, including Art Deco, in the design of federal post offices starting in 1934 under [architect] Louis Simon."[45] Pursuant to Section 21.04.040 the City Municipal Code, the City considers the 23 NRHP-/CRHR-eligible properties identified in the inventory of historic resources to be historically significant.

In 2013, Tetra Tech prepared the *United States Postal Service Postal Historic Structure Report Developmental History for Burlingame Main Post Office, 220 Park Road* for the U.S. Postal Service (USPS). The 2013 Tetra Tech report supported the Section 106 process associated with the sale of the Post Office building out of federal ownership (described in the following section) and evaluated the Post Office building as eligible for listing in the NRHP under the following two criteria:

- **NRHP Criterion A (Events):** Significant as a community postal facility planned and designed under the federal New Deal public works programs in the United States during the Great Depression, and
- **NRHP Criterion C (Architecture/Design):** Significant for embodying the distinctive characteristics of Great Depression–era public institutional buildings, which were supported by the federal government and expressed elevated qualities of design, materials, and workmanship.

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43 Tetra Tech, Inc. 2013. *United States Postal Service Postal Historical Structure Report Developmental History for Burlingame Main Post Office, 220 Park Road*. February. Prepared for the United States Postal Service. Pages 7–9.

44 Ibid. Page 10.

45 Carey & Co., Inc. 2008. *Inventory of Historic Resources, Burlingame Downtown Specific Plan*. October 6. Available: https://www.burlingame.org/document_center/Planning/General%20and%20Specific%20Plans/Historic%20Resources%20Inventory.pdf. Accessed: September 16, 2020. Page 25.

In consideration of these areas of significance, the 2013 report identified the building's period of significance as the year when construction commenced, 1941.[46]

Integrity

In addition to meeting at least one of four criteria, a property or district that is eligible for NRHP and CRHR listing must retain historic integrity, meaning that it must have the ability to convey its significance through the retention of seven aspects, or qualities, that, in various combinations, define integrity:

- **Location:** The place where the historic property was constructed;
- **Design:** The combination of elements that creates the form, plan, space, structure, and style of the property;
- **Setting:** The physical environment of the historic property, inclusive of the landscape and spatial relationships of the buildings;
- **Materials:** The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form the historic property;
- **Workmanship:** Physical evidence of the crafts of a particular culture or people during any given period in history;
- **Feeling:** The property's expression of the aesthetic or historic sense of a particular period of time; and
- **Association:** Direct link between an important historic event or person and a historic property.

The 2013 report assessed the building's historical integrity in light of its identified period of significance (1941). The evaluation concluded that the building has undergone relatively few changes to its exterior design and publicly accessible interior spaces since its construction and therefore retains sufficient integrity under all seven aspects to convey its historical and architectural significance.[47] Based on its documented significance and integrity, the Post Office building appears eligible for listing in the NRHP and CRHR.

Character-Defining Features

Character-defining features are the physical attributes of a historical resource that allow it to convey its significance. Identification of character-defining features supports an understanding of how proposed modifications to the resource would affect its historical or architectural integrity and therefore whether those modifications could materially impair the significance of the resource. In consideration of the Post Office building's significance under NRHP Criteria A and C and its period of significance of 1941, the 2013 report identified the following exterior character-defining features:

- Overall mass and plan of the main, Park Road, façade of the post office;
- Poured concrete exterior siding and smooth stucco wall cladding;
- Original metal-frame windows;

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[46] Tetra Tech. 2013. *United States Postal Service Postal Historical Structure Report Developmental History for Burlingame Main Post Office, 220 Park Road*. Page 27.

[47] Ibid. Page 29.

- Original bronze doors;
- Red clay tile roof;
- Cast stone Art Deco relief sculptures over the main entrances and under the windows; and
- Bronze relief of a woman over the entrance doors.

Tetra Tech also identified the following extant interior character-defining features:

- The original hanging light fixtures;
- The marble wainscoting, including marble on vestibule walls;
- Metal trim throughout the interior:
- Original tall tables used for post office patrons; and
- Original service windows;
- Original bronze bulletin board;
- Federal star motifs;
- Terrazzo flooring;
- Original windows and doors to and within lobby;
- Cantilevered service desks;
- Original post office boxes; and
- Original built-in lobby furniture, such as tables.[48]

Archaeological Resources

A review of existing literature housed at the Northwest Information Center of the California Historical Resources System was conducted on August 5, 2020. The Project site, as well as a 0.25-mile buffer, was examined to identify any archaeological resources or cultural resource studies that were previously conducted. One previously conducted cultural resource study was identified that covers portions of the Project site.

> **S-048732** – D. Jurich and A. Grady. 2011. *California High-Speed Train Project, Environmental Impact Report/Environmental Impact Statement, Draft: San Francisco to San José Section, Archaeological Survey Report, Technical Report.* This archaeological reconnaissance study covers a linear project area and runs through San Francisco, San Mateo, and Santa Clara Counties. No archaeological resources were identified as a result of this study.

No previously recorded archaeological resources were identified within the Project site or within 0.25 mile of the Project site.

[48] Ibid. Pages 28 and 29.

A review of geologic maps revealed that the Project site sits entirely on Pleistocene alluvium.[49] Pleistocene-age landforms are generally believed to have decreased potential with respect to containing buried archaeological resources because they developed prior to the arrival of humans in North America. Therefore, the presence of Pleistocene-age alluvium within the Project site indicates a lower probability for buried archaeological resources. However, the Project site is 0.5 mile from the historic shoreline, and several freshwater streams are nearby.[50] Freshwater streams and San Francisco Bay provided important subsistence resources for the prehistoric people who occupied San Mateo County. The presence of freshwater streams, such as Burlingame Creek and Ralston Creek, and the Project site's proximity to the pre-development shoreline suggest that there remains some potential for Project-related construction to encounter previously undocumented buried archaeological resources.

The area of San Mateo County where the city of Burlingame now sits was originally used for farming and ranching purposes. Although the city of Burlingame was initially planned out as early as 1866, the town remained a rural community until 1906. Following the earthquake that year, many residents of San Francisco relocated to Burlingame, which incorporated in 1908. A review of historic maps shows that the Project site remained unoccupied until the Post Office building was constructed at its current location in 1941.[51] Because the Project site was vacant up until 1941 and the area remained rural, the potential for historic-era archaeological resource to be present within the Project site is low. However, the potential exists for as-yet undocumented historic-era archaeological resources to be encountered during Project-related ground disturbance.[52]

The absence of archaeological resources in the vicinity of the Project site, combined with the presence of Pleistocene-age landforms, suggests decreased sensitivity for buried prehistoric archaeological resources. In addition, because the Project site was unoccupied and in a largely rural area, there is also decreased sensitivity for historic-era archaeological resources. However, the potential exists for as-yet undocumented archaeological resource to be encountered.

Tribal Consultation

On July 23, 2020, the Native American Heritage Commission (NAHC) was asked to search its Sacred Lands File and provide a list of California Native American tribes that are culturally affiliated with the geographic area where the Project site is located. Refer to Section XVIII, *Tribal Cultural Resources*, for a description of the tribal consultation and responses.

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49 Rockridge Geotechnical. 2019. *Preliminary Geotechnical Investigation to Support Due Diligence Evaluation Proposed Residential Building, 220 Park Road, Burlingame, California*. November 22. Prepared for Regis Homes Bay Area, LLC.

50 Nationwide Environmental Title Research, LLC. n.d. *Historic Aerials*. Available: http://www.historicaerials.com. Accessed: August 20, 2020.

51 Ibid.

52 Tetra Tech. 2013. *United States Postal Service Postal Historical Structure Report Developmental History for Burlingame Main Post Office, 220 Park Road*. Pages 8–10.

Regulatory Setting

Federal

Secretary of the Interior's for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings

The Secretary of the Interior's for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings (Secretary's Standards) provide guidance for reviewing work on historic properties.[53] Developed by the National Park Service for reviewing certified rehabilitation tax credit projects, the Secretary's Standards have been adopted by local government bodies across the country for reviewing proposed work on historic properties under local preservation ordinances. The Secretary's Standards provide a useful analytical tool for understanding and describing the potential impacts of changes to historic resources, including new construction inside or adjoining historic districts, and are used to inform CEQA review.

State

California Environmental Quality Act

CEQA, as codified in Public Resources Code Section 21000 et seq. and implemented by the CEQA Guidelines (14 California Code of Regulations [CCR] Section 15000 et seq.), is the principal statute governing environmental review of projects in California. Section 21084.1 of the Public Resources Code and Section 15064.5 of the CEQA Guidelines define a historical resource for purposes of CEQA as a property listed in, or eligible for listing in, the CRHR; included in a qualifying local register; or determined by a lead agency to be historically significant.

Under CEQA, a substantial adverse change in the significance of a resource means the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. Actions that would materially impair the significance of a historical resource are any actions that would demolish or adversely alter the physical characteristics that convey the property's historical significance and qualify it for inclusion in the CRHR, the NRHP, or in a local register or survey that meets the requirements of Public Resources Code Sections 5020.1(k) and 5024.1(g).

Projects that comply with the Secretary's Standards benefit from a regulatory presumption under CEQA that they would have a less-than-significant impact on a historical resource (14 CCR 15126.4[b][1]). Projects that do not comply with the Secretary's Standards may or may not cause a substantial adverse change in the significance of a historical resource and may be subject to further analysis to assess whether they would result in material impairment of a historical resource's significance.

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[53] U.S. Department of Interior, National Park Service, Cultural Resources, Preservation Assistance Division. 1992. *Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings*. The standards, revised in 1992, were codified as 36 Code of Federal Regulations (CFR) Part 68.3 in the July 12, 1995, *Federal Register* (Vol. 60, No. 133). The revision replaces the 1978 and 1983 versions of 36 CFR 68 titled *The Secretary of the Interior's Standards for Historic Preservation Projects.* The 36 CFR 68.3 standards are applied to all grant-in-aid development projects assisted through the National Historic Preservation Fund. Another set of standards, 36 CFR 67.7, focuses on "certified historic structures," as defined by the IRS Code of 1986. The standards in 36 CFR 67.7 are used primarily when property owners are seeking certification for federal tax benefits. The two sets of standards vary slightly, but the differences are primarily technical and non-substantive in nature. The guidelines, however, are not codified in the *Federal Register*.

Local

City of Burlingame Municipal Code and City of Burlingame Historic Register

The City Municipal Code outlines the City's Historic Resource Preservation Program, which includes measures to recognize and preserve historical resources at Chapter 21.04, *Historic Resource Preservation*.[54] Chapter 21.04 established procedures related to the preservation of historical resources in the City of Burlingame Historic Register (Register). The Burlingame City Council officially created the Register through resolution in November 2020, which also established the City of Burlingame Historic Preservation Commission to maintain the Register.[55] Chapter 21.04 outlines the designation process by which property owners may list their buildings in the Register as well as the role of the City of Burlingame Historic Preservation Commission in reviewing proposed exterior alterations to built-environment resources listed in the Register. Such exterior changes will be approved if they are determined to be consistent with the Secretary's Standards. Chapter 21.04 also outlines incentives for rehabilitations that comply with the Secretary's Standards, including financial incentives and zoning variances.[56]

Per Chapter 21.04, the Historic Resource Preservation Program applies to the Specific Plan area, which is generally bounded by Oak Grove Avenue, California Drive, Anita Drive, Peninsula Avenue, and El Camino Real.

Post Office Building Preservation Covenant

From the early 1940s until 2014, the Post Office building was under the ownership of the USPS, the federal agency responsible for postal delivery. As part of USPS efforts to divest itself of the Post Office building to a private-sector landowner, the agency worked with the City of Burlingame to develop a preservation covenant (covenant), which was recorded as part of the Post Office building's property deed. The covenant is attached to this document as Appendix B.

The language of the covenant states that the grantee of the deed is obligated to:

> Restore, maintain, preserve, or rehabilitate the historic character-defining features of this property [...] in accordance with the recommended approaches of the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings in order to preserve those qualities that make the property eligible for listing on the National Register of Historic Places.[57]

The covenant specifies that the California Office of Historic Preservation or an authorized representative of the City of Burlingame must approve any rehabilitative activities proposed for the building prior to the commencement of such work.

The covenant identifies the features that qualify the Post Office building for NRHP listing as the character-defining features identified in the 2013 report and listed above under *Past Evaluations and Property Significance*. The covenant also states that review and approval requirements do not apply to the following interior features: plasterboard carousel near the Lorton Avenue entrance, acoustic

[54] City of Burlingame. 2020. *Burlingame Municipal Code*. Chapter 21.04, Historic Resource Preservation. Available: http://qcode.us/codes/burlingame/view.php?topic=21-21_04&showAll=1&frames=on. Accessed: July 29, 2020.

[55] City of Burlingame. 2020. Resolution No. 140-2020. November 2, 2020.

[56] City of Burlingame. 2020. *Burlingame Municipal Code*.

[57] U.S. Postal Service. n.d. *220 Park Road, Burlingame, CA: Preservation Covenant Language*. Page 1.

ceiling and wall tiles, fluorescent lighting fixtures, and interior finishes and detailing in non-public areas of the building.[58] Furthermore, the covenant specifies the following, related to California Office of Historic Preservation or City of Burlingame approval of proposed rehabilitation of the building:

> Though the same exterior features on the main façade exist on the secondary (Lorton Avenue) façade, the historic primary entry to the building is from Park Road. For this reason, proposals for construction, alteration, or rehabilitation of the property that affect the historic features of the Park Road façade are to be viewed with a more critical eye (pursuant to the Secretary of the Interior's Standards). There may be greater latitude for modifications to the Lorton Avenue façade that still retain the essence of the historic exterior features (e.g., modification of spatial relationships among identified character-defining features or relative to the street frontage, relocation of features, replication, or similar design approaches that are consistent with the Secretary of the Interior's Standards).[59]

For the purposes of reviewing the Project for CEQA impacts, the language of the covenant excerpted above guides interpretation of the Secretary's Standards, as described in the impacts analysis below.

Previous CEQA Documents

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, found less-than-significant impacts related to cultural resources with implementation of governing rules, regulations, and mitigation measures. The Specific Plan proposed several programs related to the protection and rehabilitation of built-environment resources. These include the following: a design review process for new construction and rehabilitation projects in the downtown district, establishment of a Downtown Burlingame Register of Historic Resources to identify significant built-environment resources, promotion of the State Historical Building Code and modified planning code requirements for designated historical resources, implementation of a tax abatement incentive under the state-level Mills Act, reduced permit fees for rehabilitation projects that adhere to the Secretary's Standards, reduced parking requirements for historic rehabilitation projects, and grants for façade restoration projects. The IS/MND concluded that implementation of the goals and policies in the Specific Plan, along with subsequent environmental review by project, would result in less-than-significant impacts on historic buildings. Included in the Specific Plan IS/MND are Mitigation Measure N-1/SCA-25 and Mitigation Measure N-2/SCA-27, which would reduce impacts on previously unidentified archaeological resources and human remains.

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

[58] Ibid., 1–2.
[59] Ibid., 1.

Discussion

a. Cause a substantial adverse change in the significance of a historical resource, pursuant to Section 15064.5? (Less than Significant)

The Project site contains one CEQA historical resource, the NRHP-eligible Post Office building located at 220 Park Road. As presented in Chapter 2, *Project Description*, the Project proposes to construct a six-story building on the Project site, primarily within the setback along Lorton Street and over the primary volume of the Post Office building. The primary façade along Park Road and the majority of the west façade, including its seven window openings, would be retained, as would the interior public lobby. The Project would demolish the wing along Lorton Avenue as well as the mailroom and loading area within the building's primary volume.

The Project would require excavation to accommodate below-grade parking spaces, which would involve temporary relocation of the retained lobby portion of the primary volume and the Park Road office wing during initial phases of construction. Site constraints would require disassembly of these retained portions of the building, including the entry stairs and landing, prior to their temporary relocation. The new building would be set back from the Park Road façade and exhibit a modern architectural style and cubic volume that would incorporate aesthetic references to the Art Deco style. Some character-defining features from the Lorton Avenue façade would be salvaged for reinstallation, including the Lorton Avenue bronze doors, relief sculpture, and eagle relief panels.

The assessment of the Project's impacts on the Post Office building is informed by the *220 Park Road Secretary of the Interior's Standards Analysis* (Appendix C), completed by Page & Turnbull in November 2020. Page & Turnbull assessed the Project relative to the Secretary's Standards within the context of the covenant for the Post Office building, which, as described above, provides a guide for application of the Secretary's Standards for the subject building. Specifically, the covenant provides greater flexibility for modifications to the Lorton Avenue façade than to the Park Road (primary) façade.

Although the Project would remove character-defining features from the Lorton Avenue façade, Page & Turnbull's analysis determined that the Project would fully comply with nine of the Secretary's Standards (Standards 1 through 9) and substantially comply with the remaining standard, Standard 10. Modifications to the building (i.e., demolition of the Lorton Avenue façade) proposed under the Project conform to the language of the covenant, which accommodates a higher degree of change. The features to be removed on the Lorton Avenue façade are also present on the Park Road façade and will remain in place. Page & Turnbull's analysis concluded that the Post Office building would retain its ability "to express the features, design, and context that make it eligible for listing or designation on the National Register and the California Register."[60] Furthermore, the City would require conditions of approval to ensure that the Project Sponsor would disassemble, move, store, and reassemble the building components retained by the Project in a manner that would be consistent with the Secretary's Standards.

Because the analysis in Appendix C concludes that the Project is in compliance with the Secretary's Standards, as outlined in the covenant, Project impacts on the Post Office building would be ***less than significant***, pursuant to 14 CCR 15126.4(b)(1). No mitigation is required. This impact was adequately addressed in Previous CEQA Documents.

[60] Page & Turnbull. 2020. *220 Park Road Secretary of the Interior's Standards Analysis.* November 9. Prepared for the City of Burlingame. Page 22.

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

No previously recorded archaeological resources located on the Project site were identified during the Northwest Information Center literature review. In addition, a review of geologic maps revealed that the Project site sits on Pleistocene alluvium, a landform that is generally considered to have low potential with respect to containing buried archaeological resources. However, given the Project site's proximity to both the pre-development shoreline and two freshwater streams, the potential remains for previously undocumented archaeological resources to be encountered during Project-related ground disturbance. The maximum depth of planned excavation would be at least 25 feet below the ground surface (bgs). Deep ground-disturbing activities have the potential to affect as-yet undocumented archaeological resources; therefore, the Project has the potential to affect as-yet unknown prehistoric and historic archaeological resources. Such resources may be eligible for listing in the CRHR. If such resources were to be destroyed by Project-related activities, the impact would be significant.

Implementation of SCA-25, as described in the Specific Plan, would ensure that impacts on as-yet unknown cultural resources would be avoided or minimized, resulting in an impact that would be ***less than significant***. This impact was adequately addressed in Previous CEQA Documents.

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

The potential to encounter human remains, including those interred outside of dedicated cemeteries, is low because previously recorded archaeological resources are absent at the site. The potential is also low because of the landform on which the Project site sits and because of the lack of sacred lands, as identified through outreach with the NAHC and consultation with California Native American tribes. However, although the likelihood may be low, the potential exists for previously undiscovered human remains to be encountered during Project demolition or construction. Buried deposits may be eligible for listing in the CRHR; therefore, this impact would be potentially significant. Implementation of SCA-27, as described in the Specific Plan, would require construction work to be stopped if human remains are encountered during ground-disturbing activities and proper procedures regarding notification to be followed, per Section 50977.98 of the Public Resources Code and Section 7050.5 of the State Health and Safety Code. Implementation of SCA-27 would ensure that impacts on human remains would be minimized, resulting in an impact that would be ***less than significant***. This impact was adequately addressed in Previous CEQA Documents.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to cultural resources than those identified previously. Implementation of existing rules and regulations governing cultural resources, along with implementation of the City's General Plan goals and policies, would ensure that potential impacts would be less than significant. In addition, SCA-25 and SCA-27 would reduce impacts on undiscovered archaeological resources and human remains to less than significant. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The impacts on cultural resources were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

VI. Energy

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation?	☐	☐	☐	☒
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Setting

Electricity

Grid electricity and natural gas service in Burlingame is provided by Pacific Gas & Electric (PG&E) and Peninsula Clean Energy (PCE). PG&E is a publicly traded utility company that generates, purchases, and transmits energy under contract with the California Public Utilities Commission. PG&E's service territory is 70,000 square miles in area, roughly extending north to south from Eureka to Bakersfield and east to west from the Sierra Nevada to the Pacific Ocean. PG&E's electricity distribution system consists of 106,681 circuit miles of electric distribution lines and 18,466 circuit miles of interconnected transmission lines.[61] PG&E electricity is generated by a combination of sources, such as hydropower, gas-fired steam, and nuclear energy as well as newer sources of energy, such as wind turbines and photovoltaic plants, or "solar farms." "The Grid," or bulk electric grid, is a network of high-voltage transmission lines that link power plants to substations. The distribution system, composed of lower-voltage secondary lines, is at the street and neighborhood level. It consists of overhead or underground distribution lines, transformers, switching equipment, and service "drops" that connect to the individual customer.[62]

The City of Burlingame is part of PCE, San Mateo County's electricity provider, which distributes additional renewable power to the region. PCE is a community-choice energy (CCE) program, which is a locally controlled community organization that enables residents and businesses to have a choice regarding where their energy comes from. CCE programs allow local governments to pool the electricity demands of their communities, purchase power with higher renewable content, and reinvest in local infrastructure. Currently, PG&E delivers the power, maintains the lines, and bills customers, but the power is purchased by the CCE program from renewable energy sources such as solar, wind, hydroelectric, geothermal, and biomass.[63]

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61 Pacific Gas & Electric. 2020. *Company Profile*. Available: https://www.pge.com/en_US/about-pge/company-information/profile/profile.page. Accessed: July 31, 2020.

62 Pacific Gas & Electric. 2020. *PG&E's Electric System*. Available: https://www.pge.com/includes/docs/pdfs/shared/edusafety/systemworks/electric/pge_electric_system.pdf Accessed: July 31, 2020.

63 Peninsula Clean Energy. 2015. *Community Guide*. Available: https://www.peninsulacleanenergy.com/wp-content/uploads/2015/10/PCE_community_guide_v2_web.pdf. Accessed: July 31, 2020.

Natural Gas

PG&E's natural gas (methane) pipe delivery system includes 42,000 miles of distribution pipelines and 6,700 miles of transmission pipelines. Gas delivered by PG&E originates in gas fields in California, the Southwest, Rocky Mountains, and Canada. Transportation pipelines send natural gas from fields and storage facilities in large pipes under high pressure. The smaller distribution pipelines deliver gas to individual businesses or residences. PG&E gas transmission pipeline systems serve approximately 15 million gas and electric energy customers in California. The system is operated under an inspection-and-monitoring program in real time on a 24-hour basis. The program provides leak inspections, surveys, and patrols of the pipelines.[64]

Previous CEQA Documents

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, prepared energy conservation analyses pursuant to Public Resources Code Section 2100(b)(3) and Appendix F of the CEQA Guidelines. Implementation of the Specific Plan and the General Plan could increase vehicle miles traveled and energy usage. However, increased density, as proposed under these plans, would provide for more efficient use of resources in the city, ensuring that development would not result in the wasteful or inefficient use of energy resources. Impacts would be less than significant, and no mitigation measures are warranted.

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

Discussion

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

Construction

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

[64] Pacific Gas & Electric. 2020. *Learn about the PG&E Natural Gas System*. Available: https://www.pge.com/en_US/ safety/how-the-system-works/natural-gas-system-overview/natural-gas-system-overview.page. Accessed: July 31, 2020.

It is estimated that construction of the Project would generate approximately 1,219 metric tons of CO_2e, which is equivalent to 263 typical passenger vehicles being added to the road during the construction period.[65] The emissions generated during construction of the Project would result primarily from the use of diesel-powered construction equipment. In addition, the Project would be required to implement relevant policies from the City's Climate Action Plan that are geared toward reducing construction-related GHG emissions, which would consequently result in reductions in energy use as well. This is discussed further in Section VIII, *Greenhouse Gas Emissions*. Construction emissions would cease once construction of the Project is complete; therefore, they are considered short term. Construction would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. The impact would be ***less than significant*** and was adequately addressed in the Previous CEQA Documents.

Operation

The Project would consume energy to support normal day-to-day operations associated with the proposed office and retail uses. Vehicles and mass transit used by employees and visitors/guests when traveling to and from the Project site would require energy in the form of gasoline, diesel, natural gas, and/or electricity. The specific fuel required for transport would depend on the mode of transportation and type of engine used to propel the vehicle. The Project would implement TDM measures to reduce the number of trips generated by the Project (see *Transportation Impact Analysis* in Appendix D). In addition, the Project area is well served by SamTrans, Caltrain, and the Burlingame Trolley. Furthermore, the site would be approximately 0.1 mile south of the Burlingame Caltrain station. Users of the site would be able to use this transit stop instead of a vehicle.

Energy would also be required to heat and cool the proposed building, provide indoor and outdoor lighting, and transport water/wastewater. The Project would be within the 70,000-square-mile PG&E service territory for electricity and natural gas generation, transmission, and distribution. In addition, PG&E continues to expand its renewable energy portfolio. Because of the Project's size and location within an urban setting, buildout of the Project would not significantly increase energy demand within the service territory and would not require new energy facilities. Energy projections from energy providers within the state anticipate growth from development, such as the Project.

The Project would be required by law to adhere to CCR Title 24, the California Green Building Standards Code (CALGreen) as well as adopted City energy conservation ordinances and regulations. Unless otherwise noted in the regulation, all newly constructed buildings in California, such as the building constructed as part of the Project, are subject to the requirements of CALGreen, which contains both mandatory and voluntary measures. For non-residential land uses, there are several mandatory measures, including, but not limited to, reductions in exterior light pollution, water-conserving plumbing fixtures and fittings, recycling standards, and specifications for efficient heating, ventilation, and air-conditioning (HVAC) systems. In addition, the Project would aim to at least meet the requirements of the Leadership in Energy and Environment Design (LEED) rating for "Gold." Furthermore, the Project would be required to implement relevant policies from the City's Climate Action Plan that are geared toward reducing operation-related GHG emissions, which would consequently result in a reduction in energy use as well. This is discussed further in Section VIII,

[65] U.S. Environmental Protection Agency. 2020. *Greenhouse Gas Equivalencies Calculator*. Available: https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator. Accessed: September 25, 2020.

Greenhouse Gas Emissions. Accordingly, with implementation of adopted state and City energy conservation measures, the Project would result in a ***less-than-significant*** impact with respect to the wasteful, inefficient, or unnecessary consumption of energy resources. This impact was adequately addressed in the Previous CEQA Documents.

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

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

As mentioned above, the Project would be designed to achieve a minimum LEED rating of "Gold." Although the Specific Plan does not include policies relating to energy use and resources, the City's 2040 General Plan contains goals, policies, and programs that require local planning and development decisions to consider impacts on energy resources. The Project would adhere to General Plan goals and policies, which would serve to increase energy conservation and minimize potential impacts associated with energy use. As part of the City's approval process, the Project would be required to comply with existing regulations, including zoning regulations that promote energy conservation and efficiency by requiring sustainable building practices and reducing automobile dependency. Furthermore, implementation of the City's Climate Action Plan and compliance with CALGreen, as well as other applicable state and local energy efficiency measures, would result in energy conservation and savings. Refer to Section VIII, *Greenhouse Gas Emissions,* for additional discussion on the Project's consistency with regulations related to sustainability. The Project would result in a ***less-than-significant*** impact related to conflicting with a state or local plan for renewable energy and energy efficiency. This impact was adequately addressed in the Previous CEQA Documents.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to energy than those identified previously. Implementation of existing rules and regulations governing energy use and efficiency, along with implementation of the City's General Plan goals and policies, would ensure that potential impacts would be less than significant. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The energy impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

VII. Geology, Soils, and Paleontological Resources

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	n/a	n/a	n/a	n/a
2. Strong seismic ground shaking?	n/a	n/a	n/a	n/a
3. Seismically related ground failure, including liquefaction?	☐	☐	☐	☒
4. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c. Be located on a geologic unit or soil that is unstable or would become unstable as a result of the Project and potentially result in an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Setting

Burlingame is in the Coast Ranges geomorphic province, in eastern San Mateo County, and adjacent to San Francisco Bay.[66] The Bay Area is considered one of the most seismically active areas in the country and, therefore, subject to the effects of earthquakes. The city of Burlingame, as well as the Project site, is situated in the central portion of the San Francisco Peninsula, at the eastern edge of a system of ridges, valleys, and hills that lie east of the northwesterly-trending rift valley of the active San Andreas fault. The San Andreas fault is a major fault that traverses the Bay Area.[67]

The Project site ranges from approximately 30 feet above mean sea level (msl) in the northern corner of the site to 34 feet above msl in the southern corner of the site. The topography is relatively flat. The Project site is underlain by alluvial fan and fluvial deposits of Pleistocene age, consisting of small pieces of gravel, sand, sediment, and clay.[68] The total thickness of the alluvial fan and fluvial deposits is unknown but approximated to be more than 50 feet. Cone penetration test probes indicated the presence of hard clay and silty clay interbedded with very dense/stiff soil, with a zone of stiff to very stiff clay and silty clay from 37 to 43 feet bgs. Groundwater was measured at a depth of approximately 13 feet bgs during the investigation; however, the historic high groundwater level in the area was reported to be about 10 feet bgs.[69] Actual groundwater levels fluctuate seasonally with variations in rainfall, temperature, and other factors.

Ground Shaking

As stated previously, the Project site is in an area that is subject to earthquakes. The Alquist-Priolo Earthquake Fault Zoning Act (1972) and the Seismic Hazards Mapping Act (1990) direct the State Geologist to delineate regulatory zones to help cities and counties prevent the construction of buildings for human occupancy on the surface trace of active faults. The Project site is not in a currently established State of California Earthquake Fault Zone.[70] Furthermore, no active or potentially active faults are known to pass directly beneath the site.[71] However, the Project site is near several active faults that are capable of generating large earthquakes.

Table 3-10 shows the regional faults within approximately 30 miles of the Project site as well as the mean characteristic moment magnitude of these faults.

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66 California Geological Survey. 2002. *California Geomorphic Provinces*. (Note 36). Available: https://www.contracosta.ca.gov/DocumentCenter/View/34134/CGS-2002-California-Geomorphic-ProvincesNote-36-PDF. Accessed: August 7, 2020.

67 Rockridge Geotechnical. 2019. *Preliminary Geotechnical Investigation to Support Due Diligence Evaluation Proposed Residential Building, 220 Park Road, Burlingame, California*. November 22. Prepared for Regis Homes Bay Area, LLC.

68 Ibid.

69 Ibid.

70 California Geological Survey. n.d. *Earthquake Zones of Required Investigation*. Available: https://maps.conservation.ca.gov/cgs/eqzapp/app/. Accessed: August 7, 2020.

71 Rockridge Geotechnical. 2019. *Preliminary Geotechnical Investigation to Support Due Diligence Evaluation Proposed Residential Building, 220 Park Road, Burlingame, California*. November 22. Prepared for Regis Homes Bay Area, LLC.

Table 3-10. Regional Faults

Fault Name	Approximate Distance to Project Site (miles)	Mean Characteristic Moment Magnitude
North San Andreas (Peninsula Segment)	2.5	7.23
North San Andreas (1906 Event Segment)	2.5	8.05
San Gregorio Connected	9.3	7.50
Monte Vista-Shannon	11.2	6.50
Hayward (Total Segment)	15.5	7.00
Hayward-Rodgers Creek (Total Segment)	15.5	7.33
North San Andreas (North Coast Segment)	19.3	7.51
Calaveras (Total Segment)	24.2	7.03
Mount Diablo Thrust	26.7	6.70
Green Valley Connected	29.8	6.80

Source: Rockridge Geotechnical. 2019*. Preliminary Geotechnical Investigation to Support Due Diligence Evaluation Proposed Residential Building, 220 Park Road, Burlingame, California*. November 22. Prepared for Regis Homes, Bay Area, LLC.

Liquefaction

The Project site is not mapped as having the potential for liquefaction.[72] Although the Project site is near an area that has been mapped as having the potential for liquefaction and underlain by dense to very dense/stiff soil with stiff and silty clay, the potential for liquefaction-related settlement is minimal.[73] Liquefaction occurs when saturated soils lose strength and stiffness with applied stress, such as during an earthquake. The lack of cohesion causes solid soil to behave like a liquid, resulting in ground deformation. Ground deformation can take on many forms, including, but not limited to, flow failure, lateral spreading, lowering of the ground surface, ground settlement, loss of bearing strength, ground fissures, and sand boils. Liquefaction within subsurface layers, which can occur during ground shaking associated with an earthquake, could result in ground settlement. The soil types most susceptible to liquefaction are loose to moderately dense, saturated non-cohesive soils with poor drainage, such as sands and silts with interbedded or capping layers of relatively low permeability. Lateral spreading typically occurs on gentle slopes with a rapid fluid-like flow. It can also occur when the potential exists for liquefaction in underlying saturated soils.

Subsidence, Soil Collapse, and Landslides

Burlingame has not experienced subsidence, either historically or recently; therefore, the potential for subsidence at the Project site is low.[74] According to USGS, subsidence is the gradual settling or sinking of the surface due to the movement of subsurface materials. The main cause of subsidence in California is

[72] California Geological Survey. 2018. *Earthquake Zones of Required Investigation San Mateo Quadrangle*. Available: https://gmw.conservation.ca.gov/SHP/EZRIM/Maps/SAN_MATEO_EZRIM.pdf. Accessed: May 21, 2020.

[73] Rockridge Geotechnical. 2019. *Preliminary Geotechnical Investigation to Support Due Diligence Evaluation Proposed Residential Building, 220 Park Road, Burlingame, Californi*a. November 22. Prepared for Regis Homes, Bay Area, LLC.

[74] Ibid.

excessive groundwater pumping;[75] however, subsidence can also be caused by peat loss and oil extraction. Soil collapse can occur after wetting collapsible soils, load application, or some combination of both.[76] Collapsible soils, which are generally found in arid or semi-arid regions, are low-density silty soils with large air spaces or gaps between the grains of soil.[77] Because the Project site is underlain by dense to very dense/stiff soils, the potential for soil collapse at the site is low.[78] The Project site is not subject to landslides and is not located near areas that may be subject to landslides.[79]

Expansive Soils

Expansive soils are characterized by their ability to undergo significant volume changes (i.e., shrink and swell) with variations in moisture content. Expansive soils are typically very fine grained and have a high to very high percentage of clay. They can damage structures and buried utilities and increase maintenance requirements. The Project site is underlain by dense to very dense/stiff soils, the expansive properties of which are unknown but should be assumed to be expansive.[80]

Paleontological Resources

Paleontological resources are fossilized remains, traces, or imprints of once-living organisms that have been preserved in rocks and sediments, providing evidence of past life on Earth. The Society of Vertebrate Paleontology[81] states that significant paleontological resources include fossils of identifiable vertebrate fossils, large or small, and uncommon invertebrate, plant, and trace fossils. The potential for an area to yield significant paleontological resources depends on the geologic age and origin of the underlying rock.

No known paleontological resources have been recorded at the Project site.[82] However, paleontological resources have been recovered from multiple locations in the San Francisco Bay Area, including inland San Mateo County.[83] In addition, as mentioned above, the Project site is underlain by alluvial fan and fluvial deposits of Pleistocene age.[84]

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75 U.S. Geological Survey. n.d. *Land Subsidence in California*. Available: https://www.usgs.gov/centers/ca-water-ls. Accessed: August 7, 2020.

76 U.S. Department of the Interior. 1992. *Characteristics and Problems of Collapsible Soils*. Bureau of Reclamation, Denver Office, Research and Laboratory Services Division, Materials Engineering Branch. Available: https://www.usbr.gov/tsc/techreferences/rec/R9202.pdf. Accessed: August 7, 2020.

77 Colorado Geological Survey. 2018. *Collapsible Soils*. Available: https://coloradogeologicalsurvey.org/2018/28848-collapsible-soils/. Accessed: August 7, 2020.

78 Rockridge Geotechnical. 2019. *Preliminary Geotechnical Investigation to Support Due Diligence Evaluation Proposed Residential Building, 220 Park Road, Burlingame, California*. November 22. Prepared for Regis Homes, Bay Area, LLC.

79 California Geological Survey. 2018. *Earthquake Zones of Required Investigation San Mateo Quadrangle*. Available: https://gmw.conservation.ca.gov/SHP/EZRIM/Maps/SAN_MATEO_EZRIM.pdf. Accessed: May 21, 2020.

80 Ibid.

81 Society of Vertebrate Paleontology. 2010. *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources.* Available: vertpaleo.org/Membership/Member-Ethics/SVP_Impact_Mitigation_Guidelines.aspx. Accessed: August 7, 2020.

82 University of California Museum of Paleontology. 2020. *Specimen Search*. Available: https://ucmpdb.berkeley.edu/. Accessed: August 7, 2020.

83 Ibid.

84 Rockridge Geotechnical. 2019. *Preliminary Geotechnical Investigation to Support Due Diligence Evaluation Proposed Residential Building, 220 Park Road, Burlingame, California*. November 22. Prepared for Regis Homes, Bay Area, LLC.

Previous CEQA Documents

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, found less-than-significant impacts related to geology and soils with implementation of governing rules and regulations. No mitigation measures were warranted. However, both the Specific Plan IS/MND and the General Plan EIR determined that there would be potentially significant impacts on paleontological resources within the downtown area and General Plan area. The Specific Plan's SCAs would help to minimize impacts on paleontological resources in the downtown planning area. In addition, with implementation of Mitigation Measure N-2/SCA-26 under the Specific Plan IS/MND, impacts on paleontological resources would be less than significant with mitigation.

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

Discussion

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

1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. (Not a CEQA Impact)

The Project site is not within an earthquake fault zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act (1972) or the Seismic Hazards Mapping Act (1990), and no known fault or potentially active fault exists within the Project site.[85] In seismically active areas, such as the San Francisco Bay Area, the remote possibility exists for future faulting in areas where faults were not previously mapped; however, the likelihood of surface fault rupture as a result of seismic activity at the Project site is low.

2. Strong seismic ground shaking? (Not A CEQA Impact)

The city of Burlingame lies close to historically active faults that can generate strong earthquakes. Development within the city is likely to be subject to strong seismic ground shaking. This includes development at the Project site. The intensity of earthquake ground motions would depend on the characteristics of the generating fault, distance to the fault and rupture zone, earthquake magnitude, earthquake duration, and site-specific geologic conditions. The San Andreas fault is the closest active fault to the Project site, approximately 2.5 miles to the south. This fault is estimated to have an average moment magnitude of 7.23. Accordingly, implementation of the Project would expose people and structures to strong

[85] California Geological Survey. n.d. *Earthquake Zones of Required Investigation*. Available: https://maps.conservation.ca.gov/cgs/eqzapp/app/. Accessed: August 7, 2020.

seismic ground shaking in case of earthquake. However, according to City of Burlingame Municipal Code Chapters 18.08.005 and 18.08.095, Burlingame has adopted the 2019 California Building Standards Code, Part 2, Volumes 1 and 2. The code requires a design-level geotechnical study to be performed for structures that would be built in areas with known geological hazards, including seismic hazards. Implementation of the recommendations provided in the design-level Project geotechnical study would minimize risks to public safety.

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

As discussed above, the city of Burlingame lies close to historically active faults that can generate strong earthquakes. In addition, as explained above, the Project site is mapped as having low susceptibility to liquefaction but is near areas mapped as having the potential for liquefaction. It is possible that the Project would exacerbate risks related to liquefaction. For example, the weight of structures constructed as part of the Project on liquefiable soils would make displacement more likely. The geotechnical report notes that the Project site is underlain by dense to very dense/stiff soil and that liquefaction-related settlement is expected to be on the order of 0.25 inch.

According to City of Burlingame Municipal Code Chapters 18.08.005 and 18.08.095, Burlingame has adopted the 2019 California Building Standards Code, Part 2, Volumes 1 and 2. The code requires a design-level geotechnical study to be performed for structures that would be built in areas with known geological hazards. With implementation of the recommendations provided in the design-level Project geotechnical study, as prepared for this Project, impacts related to expansive soils would be ***less than significant***. This impact was adequately addressed in Previous CEQA Documents.

4. Landslides? (No Impact)

As discussed above, the Project site is not within a mapped landslide zone or a designated earthquake-induced landslide zone, as shown on the California Geological Survey seismic hazard zone map for the area. The Project site is relatively flat, with minor grade variations for drainage purposes. Therefore, the Project would not exacerbate landslide risks. There would be ***no impact*** related to landslide hazards, which were adequately addressed in Previous CEQA Documents.

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

The Project site is fully developed with the Post Office building, a free-standing garage, and a surface parking lot. A portion of the Post Office building would be preserved, but all other existing features at the Project site (including the non-historic portions of the Post Office building) would be demolished and removed as part of the Project. Construction activities would be required to comply with the provisions in Appendix J of the 2007 California Building Standards Code with respect to grading, excavating, and earthwork. In addition, because more than 1 acre of soil would be affected by the Project, the Project would be subject to a Construction General Permit, which stipulates erosion control requirements. These requirements include preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that contains best management practices (BMPs). The purpose of the SWPPP is to identify potential sediment sources and prescribe BMPs to ensure that potential adverse erosion impacts would not occur during construction. Implementation of the SWPPP with BMPs would control stormwater runoff emanating from the construction site. BMPs may include damp street sweeping; appropriate covers, drains, and storage precautions for outdoor material storage

areas; and temporary cover for disturbed surfaces, which would help to minimize erosion. Furthermore, Project conformance to City grading standards and the San Mateo County Stormwater Management Plan would prevent substantial erosion as a result of construction and implementation. Therefore, the impact, which was adequately addressed in the Previous CEQA Analysis, would be ***less than significant***.

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

As discussed above, the Project site itself is not mapped as an area with the potential for liquefaction, but it is near an area with the potential for liquefaction.[86] The analysis conducted in the geotechnical report suggests that up to 0.25 inch of ground surface settlement could result from liquefaction after a seismic event. In addition, because the density of the layers is very likely not even across the Project site, there may be differential settlement.[87] Therefore, there would be a risk of liquefaction at the Project site. However, the Project would be required to conform to the California Building Standards Code to withstand earthquakes and other soil hazards and implement all building design recommendations made by the Geotechnical Engineer, as further explained below. With incorporation of code requirements and recommendations made by the Geotechnical Engineer, the potential for liquefaction at the Project site would be ***less than significant***. This impact was adequately addressed in Previous CEQA Documents.

As discussed above, Burlingame has not experienced subsidence, either historically or recently; therefore, the potential for subsidence at the Project site is low.[88] In addition, because the Project site is underlain by dense to very dense/stiff soils, the potential for soil collapse at the site is low.[89] Therefore, the Project would not result in impacts related to subsidence or soil collapse.

As identified by the California Geological Survey, the Project site is not within a landslide hazard zone; therefore, it would not result in onsite or offsite landslides.[90] Although the Project site has the potential for liquefaction, the Project would not cause lateral spreading because of the developed nature of the site and surrounding area. Furthermore, there are no open faces or slopes near the Project site.[91] According to City of Burlingame Municipal Code Chapters 18.08.005 and 18.08.095, the City has adopted the 2019 California Building Standards Code, Part 2, Volumes 1 and 2. The code requires a design-level geotechnical study to be performed for structures that would be built in areas with known geological hazards. With implementation of

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86 California Geological Survey. 2018. *Earthquake Zones of Required Investigation San Mateo Quadrangle*. Available: https://gmw.conservation.ca.gov/SHP/EZRIM/Maps/SAN_MATEO_EZRIM.pdf. Accessed: May 21, 2020.

87 Rockridge Geotechnical. 2019. *Preliminary Geotechnical Investigation to Support Due Diligence Evaluation Proposed Residential Building, 220 Park Road, Burlingame, California*. November 22. Prepared or Regis Homes, Bay Area, LLC.

88 Ibid.

89 Rockridge Geotechnical. 2019. *Preliminary Geotechnical Investigation to Support Due Diligence Evaluation Proposed Residential Building, 220 Park Road, Burlingame, California*. November 22. Prepared for Regis Homes, Bay Area, LLC.

90 California Geological Survey. 2018. *Earthquake Zones of Required Investigation San Mateo Quadrangle*. Available: https://gmw.conservation.ca.gov/SHP/EZRIM/Maps/SAN_MATEO_EZRIM.pdf. Accessed: May 21, 2020.

91 Rockridge Geotechnical. 2019. *Preliminary Geotechnical Investigation to Support Due Diligence Evaluation Proposed Residential Building, 220 Park Road, Burlingame, California*. November 22. Prepared for Regis Homes, Bay Area, LLC.

the Geotechnical Engineer's recommendations in the design-level geotechnical study, the Project would be designed to withstand soil hazards at the site. The Project impact, which was adequately addressed in the Previous CEQA Documents, would be ***less than significant***.

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

As discussed above, the Project site is underlain by dense to very dense/stiff soils, the expansive properties of which are unknown but should be assumed to be expansive.[92] Although the Project would involve excavation in areas with potentially weak soils, recommendations made in the field by the Geotechnical Engineer and outlined in the preliminary geotechnical investigation would be followed. In addition, with implementation of the recommendations provided in the design-level geotechnical study, impacts related to expansive soils would be ***less than significant***. This impact was adequately addressed in the Previous CEQA Documents.

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

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

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

The Project site is underlain by the alluvial fan and fluvial deposits (Qpaf), which date to the Pleistocene age. Therefore, the potential exists for paleontological resources to be present in the soil.[93] The Project would require excavation to a maximum depth of 25 feet bgs. Accordingly, excavation at the Project site has the potential to disturb significant paleontological resources. Such disturbance would constitute a potentially significant impact. Specific Plan SCA-26 would require all work to stop if a paleontological resource is discovered and a professional paleontologist to evaluate the resource and implement protective measures, as needed. In addition, General Plan EIR Mitigation Measure 12-1, which requires an assessment to determine if unknown paleontological resources are present, would reduce impacts to paleontological resources to less than significant. With implementation of SCA-26 and Mitigation Measure 12-1, the impact would be ***less than significant with mitigation***. This impact was adequately addressed in the Previous CEQA Documents.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to geology, soils, and paleontological resources than those identified previously. Implementation of existing rules and regulations governing geology and soils, along with implementation of the City's General Plan

[92] Ibid.

[93] Ibid.

goals and policies, would ensure that potential impacts would be less than significant. In addition, implementation of SCA-26 and General Plan Mitigation Measure 12-1 would reduce potential impacts paleontological resources to less than significant. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The geology, soils, and paleontological resources impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

VIII. Greenhouse Gas Emissions

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Setting

Global Climate Change

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

Increases in fossil fuel combustion and deforestation have exponentially increased concentrations of GHGs in the atmosphere since the Industrial Revolution.[94] Rising atmospheric concentrations of GHGs in excess of natural levels result in increasing global surface temperatures—a process commonly referred to as *global warming*. Higher global surface temperatures, in turn, result in changes to Earth's climate system, including increased ocean temperatures and acidity, reduced areas of sea ice, variable precipitation, and increased frequencies and intensities during extreme weather events.[95] Large-scale changes to Earth's system are collectively referred to as *climate change.*

The Intergovernmental Panel on Climate Change (IPCC) was established by the World Meteorological Organization and United Nations Environment Programme to assess scientific, technical, and socioeconomic information relevant to understanding climate change, its potential impacts, and options for adaptation and mitigation. The IPCC estimates that human-induced warming reached a level approximately 1°C above pre-industrial levels in 2017 and is increasing at a rate of 0.2°C per decade. Under current nationally determined contributions of mitigation from each country through 2030, global warming is expected to increase the temperature 3°C by 2100, with warming to continue afterwards.[96] Large increases in global temperatures could have substantial adverse effects on natural and human environments worldwide.

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94 Intergovernmental Panel on Climate Change. 2007. *Climate Change 2007: The Physical Science Basis.* Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. Available: https://www.ipcc.ch/site/assets/uploads/2018/05/ar4_wg1_full_report-1.pdf. Accessed: September 2020.

95 Intergovernmental Panel on Climate Change. 2018. *Global Warming of 1.5°C.* Contribution of Working Groups I, II, and III. Available: https://www.ipcc.ch/sr15/. Accessed: September 2020.

96 Ibid.

Greenhouse Gases

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

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

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

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

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

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

Table 3-11 lists the global warming potential of CO_2, CH_4, and N_2O and their lifetimes in the atmosphere.

Table 3-11. Lifetimes and Global Warming Potentials of Key Greenhouse Gases[97]

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

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

All GWPs used for CARB's GHG inventory as well as assessing attainment of the state's 2020 and 2030 reduction targets are considered over a 100-year timeframe (as shown in Table 3-11). However, CARB recognizes the importance of short-lived climate pollutants as well as the importance of reducing emissions to achieve the state's overall climate change goals. Short-lived climate pollutants have atmospheric lifetimes on the order of a few days to a few decades. Their relative climate-forcing impacts, when measured in terms of how they heat the atmosphere, can be tens, hundreds, or even thousands of

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

times greater than that of CO_2.[98] Recognizing their short-term lifespan and warming impact, short-lived climate pollutants are measured in terms of CO_2e, using a 20-year time period. The use of GWPs with a time horizon of 20 years captures the importance of the short-lived climate pollutants and gives a better perspective on the speed at which emission controls affect the atmosphere relative to CO_2 emission controls. The Short-Lived Climate Pollutant Reduction Strategy addresses CH_4, HFC gases, and anthropogenic black carbon. CH_4 has lifetime of 12 years and a 20-year GWP of 72. HFC gases have lifetimes of 1.4 to 52 years and a 20-year GWP of 437 to 6,350. Anthropogenic black carbon has a lifetime of a few days to weeks and a 20-year GWP of 3,200.[99]

Greenhouse Gas Reporting

A GHG inventory is a quantification of all GHG emissions and sinks[100] within a selected physical and/or economic boundary. GHG inventories can be performed on a large scale (e.g., for global and national entities) or on a small scale (e.g., for a building or person). Although many processes are difficult to evaluate, several agencies have developed tools to quantify emissions from certain sources. Table 3-12 outlines the most recent global, national, statewide, and local GHG inventories to help contextualize the magnitude of potential Project-related emissions.

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

Emissions Inventory	CO_2e (metric tons)
2010 IPCC Global GHG Emissions Inventory	52,000,000,000
2018 EPA National GHG Emissions Inventory	6,677,000,000
2017 CARB State GHG Emissions Inventory	424,100,000
2015 BAAQMD GHG Emissions Inventory	85,000,000

Sources: California Air Resources Board. 2019. *California Greenhouse Gas Emission Inventory – 2018 Edition*. Last revised: August 12, 2019. Available: https://ww3.arb.ca.gov/cc/inventory/data/data.htm. Accessed: September 2020.
Intergovernmental Panel on Climate Change. 2014. *Climate Change Synthesis Report*. Available: https://www.ipcc.ch/site/assets/uploads/2018/02/SYR_AR5_FINAL_full.pdf. Accessed: September 2020.
U.S. Environmental Protection Agency. 2020. *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990–2018*. Available: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks. Accessed: September 2020.
IPCC = Intergovernmental Panel on Climate Change; EPA = U.S. Environmental Protection Agency; CARB = California Air Resources Board; BAAQMD = Bay Area Air Quality Management District

Regulatory Setting

State

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

98 California Air Resources Board. 2017b. *Short-Lived Climate Pollutant Reduction Strategy*. Available: https://ww2.arb.ca.gov/sites/default/files/2018-12/final_slcp_report%20Final%202017.pdf. Accessed: September, 2020.

99 Ibid.

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

State Legislative Reduction Targets

Assembly Bill (AB) 32 (Chapter 488, Statutes of 2006), the Global Warming Solutions Act of 2006, requires the state to reduce GHG emissions to 1990 levels by 2020. Senate Bill (SB) 32 (2016) requires the state to reduce emissions to 40 percent below the 1990 level by 2030. The state's plan to reach these targets is presented in periodic scoping plans. CARB adopted the 2017 climate change scoping plan in November 2017 to meet the GHG reduction requirement set forth in SB 32[101] and proposed continuing the major programs of the previous scoping plan (e.g., programs involving cap-and-trade regulation, low-carbon fuel standards, more efficient cars and trucks, more efficient freight movement, the Renewables Portfolio Standard, methane emissions from agricultural and other wastes). The current scoping plan articulates a key role for local governments, recommending that they establish GHG reduction goals for both their municipal operations and the community consistent with those of the state.

Energy Efficiency Standards

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

Local

Metropolitan Transportation Commission

The Metropolitan Transportation Commission (MTC) is the metropolitan planning organization for the nine counties that make up the San Francisco Bay Area and the SFBAAB, which includes the city of Burlingame. As described above, SB 375 requires the metropolitan planning organizations to prepare regional transportation plans/sustainable communities strategies (RTPs/SCSs) that present integrated regional land use and transportation approaches for reducing VMT and their associated GHG emissions. CARB identified an initial goal for the SFBAAB, which is to reduce VMT per capita by 7 percent by 2020 and 15 percent by 2035 compared to 2005 levels. The MTC adopted a RTP/SCS in 2013 known as *Plan Bay Area,* which was updated in 2017 and named *Plan Bay Area 2040,* to meet the initial goal. In 2018, CARB updated the per capita GHG emissions reduction targets, which called for a 10 percent per capita GHG reduction by 2020 and 19 percent per capita reduction by 2035 compared to 2005 levels.[102] MTC will be addressing the revised goals in the next RTP/SCS.

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

[101] California Air Resources Board. 2017a. *The 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 GHG Target.* January. Available: https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed: September 2020.

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

Bay Area Air Quality Management District

As discussed in Section III, *Air Quality*, BAAQMD is responsible for air quality planning within the SFBAAB, including projects in the city of Burlingame. BAAQMD has adopted advisory emissions thresholds to assist CEQA lead agencies in determining the level of significance of a project's GHG emissions; the thresholds are outlined in the agency's *California Environmental Quality Act: Air Quality Guidelines*.[103] The emissions thresholds apply only to projects with buildout years prior to 2020. The BAAQMD CEQA Guidelines also outline methods for quantifying GHG emissions as well as potential mitigation measures.

City of Burlingame Climate Action Plan

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

> It is speculative to demonstrate achievement with longer-term goals for 2040 and 2050, based on the information known today. Furthermore, the BAAQMD does not currently recommend demonstrating compliance with these future years.[104]

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

The Climate Action Plan provides a consistency checklist application to ensure that development projects in the city are consistent with the plan and provide a streamlined review process for projects while undergoing CEQA review. The Climate Action Plan states that "projects that are consistent with the Climate Action Plan (as demonstrated using the checklist) may rely on the Climate Action Plan for the impact analysis of GHG emissions, as required under CEQA." The project-specific checklist is included in Appendix E.

Previous CEQA Document Findings

The Specific Plan IS/MND found less-than-significant impacts related to GHGs with implementation of mitigation measures, SCAs, and/or General Plan goals and policies. The Specific Plan IS/MND determined that, to reduce emissions from GHGs, individual projects would need to implement

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

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

construction-period reduction measures recommended by BAAQMD as well as Mitigation Measures E-3 through E-10/SCA-4 through SCA-10. With incorporation of these measures, impacts would be less than significant.

General Plan goals and policies establish an overall goal to protect residents from GHG emissions as a result of individual projects. Numerous goals and policies from the Healthy People and Healthy Places Element, Community Character Element, Mobility Element, and Infrastructure Element would reduce emissions. However, it was determined that the General Plan would increase GHG emissions and could conflict with or obstruct implementation of a plan, policy, or regulation adopted with the intent of reducing GHG emissions, resulting in significant and unavoidable impacts.

Impacts

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

Construction is anticipated to span approximately 27 to 28 months, beginning in 2021. Construction activities would generate direct emissions of CO_2, CH_4, and N_2O from the use of mobile and stationary construction equipment as well as vehicles (e.g., employee and vendor vehicles, trucks for hauling materials). Indirect emissions (i.e., emissions that occur offsite) would be generated with the use of electricity to power mobile offices and electric construction equipment.

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

Water consumption results in indirect GHG emissions from the conveyance, distribution, and treatment of water that is ultimately consumed in the building and then processed in a wastewater treatment plant. Waste emissions would be generated with the release of fugitive CH_4 emissions from the decomposition of organic matter at landfills. There would also be emissions generated from the use of electricity and/or gasoline to power landscaping equipment. The Project would involve the intermittent use of a 250-kilowatt diesel emergency generator. This equipment would also generate GHG emissions.

The Project would be consistent with the City's Climate Action Plan, which outlines a strategy for reducing GHG emissions in accordance with the 2030 goal. The analysis focuses on the Project's compliance and consistency with the Climate Action Plan and other applicable regulations to reduce GHG emissions.

Transportation emissions are usually the largest portion of a typical project's emissions. The Project would implement a number of features to reduce transportation emissions. Notably, the Project would be approximately 0.1 mile from the Burlingame Caltrain station and near California Drive, which provides access to bus routes. In addition, the Project Sponsor has developed a TDM plan that would result in a 20 percent reduction in trip generation compared to the standard rate estimated by the Institute of Transportation Engineers (ITE) Trip Generation Manual (10^{th} Edition). Regular monitoring and reporting would ensure that tenants are in compliance with the Climate Action Plan's standards for trip reductions. The Project would also include various pedestrian improvements in the downtown area (e.g., widening sidewalk segments, improving crossing areas, funding a pedestrian

gathering space). Therefore, the above strategies would ensure compliance with the City's Climate Action Plan and serve to reduce VMT and GHG emissions.

With respect to electric vehicles, the Project would comply with the City's electric-vehicle charging station requirements by installing 17 chargers and 23 dedicated parking stalls. The Project would therefore encourage the use of electric vehicles, consistent with the Climate Action Plan, resulting in fewer transportation emissions generated relative to a scenario with only vehicles powered by internal-combustion engines.

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

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

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

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

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

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

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to GHG emissions than those identified previously. Implementation of existing rules and regulations

governing GHG emissions, including the City's Climate Action Plan and General Plan goals and policies, would ensure that potential impacts would be less than significant. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The GHG impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

IX. Hazards and Hazardous Materials

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. Be located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport and result in a safety hazard or excessive noise for people residing or working in the Project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

Setting

Hazardous Materials

This setting for hazards and hazardous materials is based in part on the *Phase I Environmental Site Assessment* (Phase I ESA) *220 Park Road, Burlingame, California*[105] that was prepared for the Project site in December of 2019 by West Environmental Services and Technology. The purpose of the Phase I ESA

[105] West Environmental Services and Technology 2019. *Phase I Environmental Site Assessment 220 Park Road, Burlingame, California.* West Environmental Services and Technology Prepared for 220 Park-Burlingame, LLC.

was to identify recognized environmental conditions[106] (RECs) at the Project site related to the previous ownership as well as uses at the Project site and on adjoining properties. The Phase I ESA was conducted in accordance with 40 Code of Federal Regulations Part 312, *Innocent Landowners, Standards for Conducting All Appropriate Inquiries*, and American Society for Testing and Materials (ASTM) *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process E 1527-13*. The Phase I ESA identified known and suspected RECs as well as historical RECs[107] and de minimis conditions[108] associated with the Project site and offsite locations, as follows:

Onsite

- Presence of lead, from lead-based paint, in soil near the Post Office building was identified during a November 2019 Phase II ESA conducted onsite, representing a de minimis condition.
- Releases from a former onsite 2,000-gallon underground storage tank (UST) for heating oil. The releases associated with a former UST represent a historical REC.
- Potential releases to soil gas and groundwater from historical used automobile sales and repairs. A Phase II ESA was conducted in November of 2019 near the site of the former used automobile sales and repairs. The Phase II ESA sampling included the collection of soil gas and groundwater near a former garage. Laboratory analysis of soli gas revealed volatile organic compounds (VOCs), including tetrachloroethylene, benzene, toluene, ethyl benzene, and xylenes. Benzene is present above its unrestricted-use Regional Water Quality Control Board (RWQCB) Environmental Screening Levels (ESLs) for the protection of indoor air. Laboratory analysis of groundwater revealed total petroleum hydrocarbons (TPH), as diesel, above its unrestricted-use RWQCB ESLs. The Phase I ESA determined that insufficient information exists to determine whether the potential releases represent a REC; therefore, the releases were considered suspect RECs.

Offsite

- Potential for releases of TPH and VOCs northeast, east, and south of the site to migrate toward site. The releases were associated with gasoline USTs to the south at 1200 Howard Avenue and 1234 Howard Avenue. The presence of TPH, as gasoline, and VOCs in onsite soil and soil gas above unrestricted use screening levels associated with the adjacent offsite releases at 1200 Howard Avenue and 1234 Howard Avenue were identified as a REC.
- Potential for offsite releases from former automobile sales and service as well as dry cleaning operations along Lorton Avenue to migrate toward site. The Phase I ESA determined that insufficient information exists to determine whether the potential releases represent a REC; therefore, the releases were considered a suspect REC.

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

107 A historical REC is a past release of any hazardous substance or petroleum product that occurred in connection with a property but has been addressed to the satisfaction of the applicable regulatory authority or has been able to meet the unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

108 De minimis conditions generally do not present a threat to human health or the environment and generally are the subject of an enforcement action if brought to the attention of appropriate governmental agencies. De minimis conditions are not considered RECs.

Schools, Airports, and Wildfire

The closest school to the Project site is Saint Catherine of Siena School, located at 1300 Bayswater Avenue, approximately 0.10 mile south of the Project site.

The Project site is not within 2 miles of a public or private use airport or airstrip. The nearest airport is San Francisco International Airport (SFO), located approximately 2.3 miles to the northwest. However, the Project site is within SFO's Federal Aviation Regulation Part 77 sphere of influence.[109]

The city of Burlingame falls within a California Department of Forestry and Fire Protection Local Responsibility Area. The city is zoned as a Non-Very High Fire Hazard Security Zone.[110] The Project site is a developed property within an urban portion of the city, with no wildland areas nearby.

Regulatory Setting

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

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

The Department of Toxic Substances Control (DTSC), a department of the California Environmental Protection Agency, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. Division 20, Chapter 6.5, of the California Health and Safety Code deals with hazardous waste control through regulations pertaining to the transport, treatment, recycling, disposal, enforcement, and permitting of hazardous waste. Division 20, Chapter 6.10, contains regulations applicable to the cleanup of hazardous materials releases. Title 22, Division 4.5, contains environmental health standards for the management of hazardous waste. This includes standards for the identification of hazardous waste (Chapter 11) and standards that apply to transporters of hazardous waste (Chapter 13).

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (California Health and Safety Code, Chapter 6.11, Sections 25404–25404.9) consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of environmental and emergency response programs and provides authority to the Certified Unified Program Agency (CUPA). The CUPA is designed to protect public health and the

[109] Ricondo and Associates. 2012. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport*. Available: https://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf. Accessed: August 19, 2020.

[110] California Department of Forestry and Fire Protection. 2008. *Very High Fire Hazard Severity Zones in Local Responsibility Area, San Mateo County*. Available: https://osfm.fire.ca.gov/media/6800/fhszl_map41.pdf. Accessed: August 19, 2020.

environment from accidental releases and improper handling, storage, transportation, and disposal of hazardous materials and wastes. This is accomplished through inspections, emergency response, enforcement, and site mitigation oversight. The CUPA for Burlingame is San Mateo County Health.[111]

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

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

Dischargers whose projects disturb 1 or more acres of soil, such as the Project, are required to obtain coverage under the Construction General Permit (Order 2009-0009-DWQ). Construction activities subject to this permit include clearing, grading, and ground disturbances such as stockpiling or excavation. The Construction General Permit requires completion and implementation of a site-specific SWPPP.

Previous CEQA Document Findings

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, found less-than-significant impacts related to hazards and hazardous materials (e.g., a risk of upset involving hazardous materials in proximity to schools) and emergency response/evacuation plans with implementation of mitigation measures, SCAs, and General Plan goals and policies. Implementation of Mitigation Measure I-1/SCA-16 (Phase I and/or Phase II ESA) of the Specific Plan IS/MND would reduce the potentially significant impact involving a release of subsurface contaminants to less than significant. Per SCA-16, a Phase I ESA has been developed for the Project site, as summarized in this section.

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

[111] San Mateo County Health. 2020. *Certified Unified Program Agency*. Available: https://www.smchealth.org/hazardous-materials-cupa. Accessed: August 18, 2020.

Discussion

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

Project construction would involve the routine transport, use, and disposal of hazardous materials such as fuel, solvents, paints, oils, grease, and caulking. During Project operation, hazardous materials that are commonly found in office and retail spaces (e.g., paints, solvents, cleaning agents) would be stored and used onsite. Hazardous materials used during operations would be used in small quantities, and spills would be cleaned up as they occur. The transport, use, and disposal of hazardous materials during construction would be required to comply with applicable regulations, as discussed above. These include the RCRA, DOT Hazardous Materials Regulations, and the local CUPA regulations. Although these materials would be transported, used, and disposed of during construction and operation, they are commonly used in construction projects and would not represent the transport, use, or disposal of acutely hazardous materials. In addition, Specific Plan SCA-3 requires the implementation of feasible control measures during construction activities to reduce pollutant emissions into the surrounding environment. SCA-3 includes, but is not limited to, watering exposed surfaces twice a day; requiring covers on haul trucks that transport soil, sand, or other loose material offsite; and minimizing idling times, either by shutting off equipment when not in use or reducing the maximum idling time to 5 minutes. Implementation of SCA-3 would further reduce potential for releases of hazardous materials during routine use. Impacts would be ***less than significant*** and were adequately addressed in the Previous CEQA Documents.

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

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

As discussed above, the site-specific Phase I ESA identified one de minimis condition, one historic REC, and one suspect REC, which were associated with onsite environmental conditions. In addition, the Phase I ESA identified one REC and one suspect REC associated with offsite conditions having the potential to affect the Project site. The Phase I ESA concluded that additional investigations would be necessary to address conditions associated with the one onsite suspect REC as well as the two offsite RECs (additional information regarding these conditions is provided above).

Additional investigations would be conducted as part of the Specific Plan SCA-16, Phase I and/or Phase II ESA. SCA-16 applies to projects within the Specific Plan area that require excavation. Under SCA-16, these types of projects would require a Phase I ESA and subsequent Phase II sampling (as recommended by the Phase I ESA for the Project). If Phase I or Phase II investigations determine that remediation is required, the Project Sponsor would be required to implement all remediation and abatement work in accordance with the requirements of the DTSC, RWQCB, or other applicable jurisdictional agency. As described throughout this section, a Phase I and Phase II ESA has been prepared for this Project, in accordance with SCA-16.

Because portions of the historic Post Office building would be demolished as part of the Project, asbestos-containing materials and lead-based paint could be present. Demolition activities could release these hazardous materials into the environment and create exposure risks for construction personnel and the surrounding environment. The federal Toxic Substances Control Act (TSCA) of 1976 provides EPA with the authority to require reporting, record-keeping, testing, and restrictions related to chemical substances and/or mixtures. The TSCA addresses issues regarding the production, importation, use, and disposal of specific chemicals, including polychlorinated biphenyls, asbestos, radon, and lead-based paint. The DTSC considers asbestos a hazardous substance and requires removal. Asbestos-containing materials must be removed in accordance with local and state regulations as well as local air district, Cal/OSHA, and California Department of Health Care Services (DHS) requirements. This includes materials that could be disturbed by demolition and construction activities. Local and state regulations require asbestos-containing material and lead-based paint surveys to be conducted to determine if these materials are present (prior to construction). If detected on the Project site, appropriate safety measures would be implemented for their removal, transport, and disposal.

Below-grade parking to be constructed as part of the Project would require excavations depths to approximately 25 feet bgs. Because of the depth of excavation, the Project site is expected to require dewatering. The State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) permit requires discharges of groundwater associated with dewatering not to cause, have reasonable potential to cause, or contribute to an in-stream incursion that would exceed applicable state or federal water quality objectives/criteria or cause acute or chronic toxicity in the receiving water. The Project would comply with applicable NPDES permit requirements.

Adherence to existing regulations, as well as SCA-16, along with asbestos-containing material and lead-based paint surveys, would reduce the impact to ***less than significant***. The impact was adequately addressed in the Previous CEQA Documents.

c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school? (Less than Significant)

Saint Catherine of Siena School is the nearest school, located approximately 0.10 mile south of the Project site. As discussed in Impact IX(a), the routine transport, use, storage, and disposal of hazardous materials such as fuel, solvents, paints, oils, grease, and caulking would occur during both construction and operation of the Project. Such transport, use, and disposal would comply with applicable regulations, such as the RCRA, DOT Hazardous Materials Regulations, and the local CUPA regulations. Although small amounts of hazardous materials would be transported, used, and disposed of during construction, these materials are commonly used in construction projects and would not represent the transport, use, and disposal of acutely hazardous materials. In addition, Specific Plan SCA-3 would require the implementation of feasible control measures for construction emissions, further reducing potential impacts on nearby sensitive receptors.

Asbestos-containing materials and lead-based paint could exist at the Project site. Demolition could release these contaminants near a school. However, asbestos-containing material and lead-based paint surveys would be conducted in compliance with existing regulations. If these materials are detected on the site, appropriate safety measures would be implemented for their removal, transport, and disposal. Therefore, compliance with existing regulations, along with SCA-3, would ensure that the impact on schools within 0.25 mile of the Project site would be ***less than significant.*** The impact was adequately addressed in the Previous CEQA Documents.

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

United States Code Section 65962.5 (commonly referred to as the Cortese List) pertains to DTSC-listed hazardous waste facilities and sites, DHS-listed contaminated wells for drinking water, SWRCB-listed sites with leaking USTs or discharges of hazardous wastes or materials into the water or groundwater, and lists of sites from local regulatory agencies with a known migration of hazardous waste/material.

The Project site is listed in the San Mateo County Local Oversight Program Leaking Underground Storage Tank database; the listing is regarding a gasoline release to onsite soils.[112] However, the Project site has a "case closed" status (as of November 1995). Moreover, the Project site is not listed in other Cortese List resources. Therefore, the Project would not create a significant hazard to the public or the environment associated with being located on a site that is included on a list of hazardous materials sites compiled pursuant to United States Code Section 65962.5, resulting in ***no impact***. Other onsite environmental conditions (as described in the Phase I ESA) are discussed in Impact IX(b).

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

The Project site is within the Federal Aviation Regulation Part 77 sphere of influence and the boundary of the SFO Airport Land Use Compatibility Plan.[113] Development on the Project site would be limited to a height of 100 feet above msl, according to the SFO Airport Land Use Compatibility Plan, but may be further restricted after notification of and consultation with the Federal Aviation Administration under Part 77.9 of the Code of Federal Regulations. The proposed structure would be below established height limits and would not pose a safety hazard. Impacts would be ***less than significant*** and were adequately addressed in the Previous CEQA Documents.

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

The Project would construct a new structure on previously developed commercial land. Access points to the site would be provided to ensure proper ingress for emergency vehicles. Although the City does not have an established evacuation plan, the Project would adhere to the guidelines established by the Community Safety Element of the 2040 General Plan. Therefore, the Project would not conflict with an adopted emergency response or evacuation plan. The impact would be ***less than significant*** and was adequately addressed in the Previous CEQA Documents.

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[112] State Water Resources Control Board. 2020. *GeoTracker.* Available: https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0608100091. Accessed: August 19, 2020.

[113] Ricondo and Associates. 2012. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport*. Available: https://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf. Accessed: August 19, 2020.

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

The Project site, which is in a highly urbanized setting with no wildlands nearby, does not lie within a Very High Fire Hazard Severity Zone of either a State Responsibility Area or Local Responsibility Area. Wildfire is unlikely to occur at the Project site. The impact would be ***less than significant*** and was adequately addressed in the Previous CEQA Documents.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to hazards and hazardous materials than those identified previously. Implementation of existing rules and regulations governing hazards and hazardous materials, along with implementation of the City's General Plan goals and policies, would ensure that potential impacts associated with hazardous conditions would be less than significant. In addition, implementation of SCA-3 would further reduce impacts during construction. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The hazards and hazardous material impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

X. Hydrology and Water Quality

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☐	☒
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project would impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or the addition of impervious surfaces, in a manner that would:			☐	☒
1. Result in substantial erosion or siltation onsite or offsite;	☐	☐	☐	☒
2. Substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite;	☐	☐	☐	☒
3. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
4. Impede or redirect floodflows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk a release of pollutants due to Project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Setting

The Project site is with the San Mateo Creek-Frontal San Francisco Bay Estuaries watershed,[114] which drains much of the eastern portion of San Mateo County. Stormwater runoff from the Project site ultimately drains into San Francisco Bay. The Project site is less than 1 mile south of Bayfront Channel, Burlingame Lagoon, and Lower San Francisco Bay, which is impaired for chlordane, dichlorodiphenyltrichloroethane, dieldrin, dioxin compounds, furan compounds, invasive species, mercury, polychlorinated biphenyls, and trash.[115]

Local drainage is managed by urban storm sewers. A storm drain easement runs along the western edge of the Project site; a 4-foot by 10-foot concrete box culvert is located within the easement. The top of the culvert is 3 to 4 feet below grade.[116] Existing stormwater infrastructure includes a 24-inch storm drain main in Park Road. The Project site consists of approximately 13,650 sf of pervious surfaces and 41,450 sf of impervious surfaces.

The City of Burlingame, which participates in the San Mateo Countywide Pollution Prevention Program (SMCWPPP), is required to implement low-impact development (LID) BMPs under the San Francisco Bay Region Municipal Regional Stormwater NPDES permit (Order No. R2-2015-0049, NPDES Permit No. CAS612008), issued November 19, 2015. This NPDES permit is also known as the San Francisco Bay Municipal Regional Permit (MRP). Provision C.3 of the MRP is directly applicable to the Project. This provision allows permittees to include appropriate source control, site design, and stormwater treatment measures in new development as well as redevelopment projects to address both soluble and insoluble stormwater runoff pollutant discharges and prevent increases in runoff flows from both new development and redevelopment projects. This goal is to be accomplished primarily through implementation of LID techniques. LID practices include source control BMPs, site design BMPs, and stormwater treatment BMPs onsite or at a joint stormwater treatment facility.

The city of Burlingame is within the Westside Groundwater Basin.[117] Groundwater depth at the site was observed at 12.9 feet bgs; however, groundwater depth is expected to vary several feet seasonally, depending on rainfall. Based on available depth-to-groundwater data, a design groundwater level of 10 feet bgs was used.[118]

The Westside Groundwater Basin is designated as a Very Low Priority Area, per the Sustainable Groundwater Management Act.[119] The South Westside Basin Groundwater Management Plan established a goal for the area that ensures a sustainable, high-quality, reliable water supply at a fair

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114 ArcGIS. n.d. *ArcGIS My Map Watershed Boundary Dataset HUC 10s*. Available: https://icf-eandp.maps.arcgis.com/ home/webmap/viewer.html?useExisting=1. Accessed: August 10, 2020.

115 State Water Resources Control Board. 2018. *2014/2016 Integrated Report (Clean Water Act Section 303(d) List/305(b) Report)—Statewide.* San Francisco Bay Regional Water Quality Control Board. EPA approved: April 6, 2018. Available: https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml. Accessed: August 10, 2010.

116 Rockridge Geotechnical. 2019. *Preliminary Geotechnical Investigation to Support Due Diligence Evaluation Proposed Residential Building 220 Park Road Burlingame California.* Project No. 19-1772. November 22.

117 Department of Water Resources. n.d. *SGMA Basin Prioritization Dashboard*. Available: https://gis.water.ca.gov/app/bp-dashboard/final/. Accessed: August 10, 2020.

118 Rockridge Geotechnical. 2019. *Preliminary Geotechnical Investigation to Support Due Diligence Evaluation Proposed Residential Building 220 Park Road Burlingame California.* Project No. 19-1772. November 22.

119 Department of Water Resources. n.d. *SGMA Basin Prioritization Dashboard*. Available: https://gis.water.ca.gov/app/bp-dashboard/final/. Accessed: August 10, 2020.

price through local groundwater management for beneficial uses. The City is part of the South Westside Basin Groundwater Management Plan, which is a voluntary groundwater management plan. Groundwater is not a supply or recharge source.

The Project site is located outside the 100-year floodplain, within Federal Emergency Management Agency (FEMA) Flood Zone X, which is normally the area between the limits of the 100-year and 500-year floods in areas of moderate flood hazard (areas with a 0.2 percent annual chance of flooding).[120]

Previous CEQA Documents

The previous CEQA documents, including the Specific Plan IS/MND and the General Plan EIR, found less-than-significant impacts related to hydrology and water quality with implementation of mitigation measures, SCAs, and/or General Plan goals and policies. The Specific Plan IS/MND determined that development in the area would not significantly alter the amount of runoff or amount of pollutants in the stormwater runoff. Adherence to the City Municipal Code, which includes compliance with NPDES permits and waste discharge requirements, would ensure that runoff would not violate water quality standards. However, the depth of groundwater in the area can be shallow, and development could lead to land subsidence and lowering of the aquifer volume. Implementation of Mitigation Measure D-1/SCA-1 would prohibit permanent dewatering, resulting in a less-than-significant impact.

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

Discussion

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

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

More than 1 acre of soil would be affected by the Project; therefore, the Project site, which is 1.28 acres, would be subject to the Construction General Permit. Furthermore, the Project would be required to comply with the MRP. Erosion control requirements are stipulated in the Construction

[120] Federal Emergency Management Agency. 2019. *National Flood Hazard Layer FIRMette 06081C0153F*. April 5.

General Permit and the MRP. These requirements include preparation and implementation of a SWPPP that contains BMPs. The purpose of the SWPPP is to identify potential sources of sediment and other pollutants and prescribe BMPs to ensure that potential adverse erosion, siltation, and contamination impacts do not occur during construction activities. Implementation of a SWPPP with BMPs would control erosion and protect water quality from potential contaminants in stormwater runoff from the construction site. BMPs may include damp street sweeping; appropriate covers, drains, and storage precautions for outdoor material storage areas; temporary cover for disturbed surfaces; and sediment basins or traps, earthen dikes or berms, silt fences, check dams, soil blankets or mats, covers for stock piles, or other BMPs to trap sediments. Such BMPs would help to protect surface water and groundwater quality.

Groundwater dewatering during construction of the below-grade levels is anticipated. However, dewatering would be temporary, and the required water quality permit(s) would be obtained prior to dewatering. Small amounts of construction-related dewatering are covered under the Construction General Permit, and the San Francisco Bay RWQCB has regulations specific to dewatering; the regulations typically involve reporting and monitoring. All requirements for dewatering would be met, ensuring that water quality would not be affected.

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

Through compliance with the Construction General Permit and San Francisco Bay RWQCB water quality requirements as well as implementation of the SWPPP and associated BMPs, construction impacts would be ***less than significant***.

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

The proposed building would be set back from the underground culvert that runs along the western edge of the property. That space would be dedicated for a new landscaped paseo. The proposed paseo would include plantings and stormwater treatment planters. These features would treat stormwater runoff through filtration. In addition, stormwater treatment measures, in compliance with state and County of San Mateo requirements, would be implemented on the site. The onsite stormwater treatment measures would include a combination of mechanical filters, stormwater treatment planters, and permeable surfaces to meet C.3 requirements.

Based on the above, operation of the Project would not violate any waste discharge requirements or otherwise substantially degrade water quality. The impact was adequately addressed in the Previous CEQA Documents. Consistent with the prior conclusions, the impact under the Project would be ***less than significant***.

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

The Project would include construction of a two-level underground parking garage. Therefore, during construction, temporary groundwater dewatering is anticipated. To minimize potential groundwater impacts during construction, installation of piezometers during the final geotechnical investigation would be considered to monitor groundwater levels.

Currently, the site is predominantly developed. With implementation of the Project, approximately 3,500 sf of the Project site would be pervious surfaces and 52,000 sf would be impervious. The amount of impervious surfaces would increase by approximately 10,500 sf. Changes in impervious surface area would not substantially change or interfere with groundwater recharge. In addition, implementation of a landscaped paseo, including plantings and stormwater treatment planters that promote infiltration by draining to pervious surfaces, would allow for infiltration and promote groundwater recharge.

In accordance with Specific Plan SCA-1, because a subgrade structure is proposed, a geotechnical study was prepared by the Project Sponsor. No permanent groundwater dewatering would be permitted during construction. However, as outlined in the geotechnical study, because the design groundwater level of 10 feet bgs is at, or just above, the finished floor elevation of the below-grade level, the foundation would need to be waterproofed.[121] Regardless, the proposed structure would not decrease the groundwater supply or interfere with groundwater recharge.

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

[121] Rockridge Geotechnical. 2019. *Preliminary Geotechnical Investigation to Support Due Diligence Evaluation Proposed Residential Building 220 Park Road Burlingame California.* Project No. 19-1772. November 22.

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

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

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

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

4. Impede or redirect floodflows? (No Impact)

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

Currently, the Project site is predominantly developed. With implementation of the Project, approximately 3,500 sf of the Project site would be pervious surfaces and 52,000 sf would be impervious. This would increase the amount of impervious surfaces by approximately 10,500 sf. The amount of impervious surface cover affects stormwater runoff. Therefore, stormwater flows would increase with implementation of the Project. However, the Project would include stormwater treatment controls, in compliance with the requirements of Provision C.3 of the MRP. Stormwater treatment areas and planters, totaling approximately 2,000 sf, would be located throughout the Project site; any overflow would drain to the 24-inch storm drain main in Park Road. These features would reduce runoff and treat stormwater through filtration. Stormwater treatment measures, in compliance with state and County of San Mateo requirements, would be implemented on the Project site. Therefore, the Project would not substantially alter existing drainage patterns or result in adverse impacts related to drainage capacity and associated impacts. The impact was adequately addressed in the Previous CEQA Documents; consistent with the prior conclusions, the impact under the Project would be ***less than significant***.

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

The Project site is outside the FEMA 100-year floodplain, within a moderate flood hazard area. Therefore, the Project site would be subject to minimal to no flood risks. The Project site is outside a tsunami inundation area; therefore, there would be no risk of inundation from a tsunami.[122] San Francisco Bay is a large, open body of water with no immediate risk of seiche. Flood risks from a seiche event would be minimal in the Project vicinity.

During construction activities, stormwater BMPs would be implemented, as required by federal, state, county, and local policies, to minimize degradation of water quality associated with stormwater runoff or construction-related pollutants. In addition, construction activities and operations would comply with local stormwater ordinances and stormwater requirements established by the MRP, SMCWPPP, and regional waste discharge requirements. Stormwater treatment measures, including plantings and stormwater treatment planters, would also reduce the risk of pollutants during a storm event. Stormwater treatment measures would include a combination of mechanical filters, stormwater treatment planters, and permeable surfaces to meet C.3 requirements. Therefore, the Project would not result in a release of pollutants due to inundation, resulting in a ***less-than-significant*** impact. This impact was adequately addressed in the Previous CEQA Documents.

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

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

Construction would comply with the appropriate water quality objectives for the region, including the MRP, regarding runoff. The NPDES Construction General Permit requires stormwater discharges to be free of pollutants that cause or contribute to an exceedance of applicable water quality objectives or water quality standards, including designated beneficial uses. The City's review and permitting process would ensure that the permit's waste discharge requirements would not be violated by the Project. Implementation of the proposed stormwater treatment measures, as well as the incorporation of plantings and raised stormwater treatment planters, would also reduce stormwater runoff flows and associated pollutants. Furthermore, General Plan policies require groundwater resources to be protected.

Groundwater in the basin is not a source for the water supply; therefore, Project operations would not increase demands for groundwater. In addition, surface landscaping would use water-efficient landscaping.

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

Based on the above analysis, the Project would not conflict with or obstruct implementation of the Water Quality Control Plan for the Basin Plan or the South Westside Basin Groundwater Management Plan, resulting in ***less-than-significant*** impacts. This impact was adequately addressed in the Previous CEQA Documents.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to hydrology and water quality than those identified previously. Implementation of existing rules and regulations governing hydrology and water quality, including the City's General Plan goals and policies, would ensure that potential impacts would be less than significant. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The hydrology and water quality impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

XI. Land Use and Planning

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Result in a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Setting

The Project site is within the Burlingame city limits and governed by the 2040 General Plan, Specific Plan, and City Municipal Code. Burlingame is divided into a series of planning areas with a variety of land uses, including commercial, office, cultural, civic, and quasi-civic uses. Land uses in the vicinity of the Project site include commercial/office, institutional, and residential uses.

The City adopted the Specific Plan in 2010 to guide the development of Burlingame's downtown district, with a particular focus on Burlingame Avenue and Howard Avenue. Plan goals include incentivizing additional business growth along Howard Avenue and side streets, re-examining downtown parking requirements, protecting and preserving downtown's historic character, and providing inviting gathering places and pedestrian-friendly streets.

The Specific Plan has assigned the HMU District designation to the Project site.[123] This allows retail, office, and multi-family residential uses along Howard Avenue. Ground-floor retail use is encouraged in the HMU District, and both housing and/or office uses are allowed on upper levels above commercial uses. The interceding side streets in this area (Lorton Avenue, Park Road, Primrose Road, and Highland Avenue) act as connector streets. The height limit in this planning area is 55 feet, and the maximum average residential unit size is 1,250 gsf. There are no requirements related to setbacks, maximum lot coverage, or landscape coverage, with the exception of the R-3 side setback standards, which apply to any property line with an existing residential use on the abutting property. The Project site is not immediately adjacent to residential uses.

The Project site is also zoned HMU (see City Municipal Code Chapter 25.33). The purpose of the HMU zone is to implement the Specific Plan HMU District land use designation. HMU standards encourage the incorporation of ground-floor retail use, with housing on upper levels of buildings above commercial uses. Development projects must comply with standards regarding setbacks, heights, and maximum lot coverage, as outline in the HMU District.

[123] City of Burlingame. 2010. *Burlingame Downtown Specific Plan.* Chapter 3, Land Use. Available: https://www.burlingame.org/document_center/Planning/General%20and%20Specific%20Plans/3.0%20Land%20Use.pdf. Accessed: July 31, 2020.

Currently, the Project site is developed with a vacant Post Office building (approximately 13,300 gsf) that was constructed in 1941. Minimal landscape vegetation exists at the site, mainly in areas adjacent to street frontages and at the entrance to the building. The site also includes a free-standing parking garage and a surface parking lot with approximately 51 parking spaces. Access to the site is currently provided from driveways on Park Road and Lorton Avenue.

Previous CEQA Documents

The previous CEQA documents, including the Specific Plan IS/MND and the General Plan EIR, found less-than-significant impacts related to land use and planning with implementation of mitigation measures, SCAs, and/or General Plan goals and policies. The Specific Plan IS/MND determined that development in the area would divide the community. The Specific Plan changed the land use designations and zoning, but with adoption of the Specific Plan, there would be no conflicts with applicable plans, policies, or regulations, resulting in less-than-significant impacts.

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

Discussion

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

The Project would redevelop the Project site to provide a six-story, mixed-use building with retail space, office space, and below-ground parking. This would be consistent with the planned land uses established under the HMU District designation in the 2010 Specific Plan, which is applicable to the Project site. The Project would not limit access to existing streets or bicycle/pedestrian pathways within the Project site or the surrounding community, including the residential uses. Furthermore, the Project would not create new streets; rather, it would create new pedestrian pathways within the Project site that would ultimately improve pedestrian circulation throughout the site and in surrounding areas. Therefore, implementation of the Project would not result in physical division of an established community. The impact was adequately addressed in the Previous CEQA Documents; consistent with the prior conclusions, the impact under the Project would be ***less than significant***.

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

The Project site is designated HMU District under the Specific Plan, General Plan, and City Zoning Code. The City's General Plan is a legal document that is required by state law. It provides direction for development and the use of land in the city. All development in the city must conform to the land use designations outlined in the General Plan. The Project would be consistent with the existing land use designations and include uses that would be consistent with those permitted under the Specific Plan as well as the City Municipal Code. However, the Project would require variances pertaining to height and parking, as allowed under City Municipal Code Section 21.04.120 to incentivize the preservation of historic structures.

The Project would generally be consistent with the requirements set forth for development in the HMU District, which is intended for a mix of uses, with retail uses encouraged on the ground floor and housing and/or office uses on the upper floors. However, the Project would require a variance for height because the proposed building would be 86.5 feet high (98.5 feet high with the roof screen), which is approximately 31.5 feet higher than the permitted height for the HMU District (43.5 feet higher with the roof screen). The permitted height for the HMU District is 55 feet. In addition, the variance would cover a reduction in the number of parking spaces, with one space per 500 gsf of office space proposed under the Project; one space per 300 gsf is required. The Project complies with all other HMU District requirements; therefore, with the approved historic variance for the parking reduction and height increase, the Project would fulfill the standards and be consistent with HMU zoning.

The 2010 Specific Plan includes various goals, policies, and implementation framework items pertaining to growth, development, design standards, historic resources, and roadways and infrastructure in Burlingame. In addition to the existing land use designation and zoning, numerous policies have been adopted for the purpose of reducing environmental impacts. In particular, the following goals and policies would apply to the Project:

- **Goal LU-2:** Provide incentives or a vibrant, diverse mix of uses.
    - **Policy LU-2.2:** Encourage a mix of uses in areas currently dominated by a singly land use.
- **Goal S-1:** Improve the streetscape, particularly at the pedestrian scale.
    - **Policy S-1.1:** Improve the safety of streetscapes through better lighting, repair of curbs and gutters, universal design/Americans with Disabilities Act compliance, and other measures.
    - **Policy S-1.3:** Streetscapes should reflect Burlingame's designation as a "tree city." Trees should be planted throughout downtown as an integral part of the streetscape, and mature trees should be preserved whenever possible.
    - **Policy S-1.7:** Require new developments and major remodel projects to include pedestrian-oriented retail design treatments on all exposed elevations.
- **Goal S-2:** Design a quality, cohesive streetscape, including landscaping.
- **Goal S-4:** Accommodate a variety of pedestrian experiences.
    - **Policy S-4.3:** Promote outdoor dining, including opportunities for outdoor seating along all exposed sides of restaurant uses.
- **Goal OS-1:** Create a "signature" downtown open space.
- **Goal OS-2:** Create small areas of relief, such as pocket parks.
    - **Policy OS-2:** Provide additional green open space in downtown, including walkways and seating areas.
- **Goal D-1:** Protect and preserve historic character.
    - **Policy D-1.1:** Ensure that new construction fits into the context and scale of the existing downtown.
    - **Policy D-1.2:** Require design review for all new downtown buildings and for changes to existing downtown buildings, and integrate historic review into the design review process.

- **Goal D-2:** Develop policies and provide incentives for the restoration, preservation, and adaptive reuse of historic structures.
- **Goal D-3:** Preserve and enhance small-town scale with walkable, pedestrian-scaled, landscaped streets.
    - **Policy D-3.1:** Ensure that new development is appropriate to Burlingame with respect to size and design.
    - **Policy D-3.2:** Evaluate development in the downtown area that is proposed to be taller than surrounding structures (i.e., over 40 feet) for potential to create new shadows or shade on public and/or quasi-public open spaces and major pedestrian routes.
- **Goal D-4:** Promote a pedestrian-friendly downtown that encourages people to walk.
    - **Policy D-4.1:** Encourage buildings to be built out to the sidewalk, with doors and windows facing the sidewalk to create a lively pedestrian environment.
- **Goal I-1:** Ensure that infrastructure is sufficient to provide for current and future land uses.

Although the City has no established policies or community standards for the evaluation of shadow impacts, Policy D-3.2 of the Specific Plan would apply to the Project. Policy D-3.2 requires an evaluation to be conducted for projects with a building height of more than 40 feet to determine shadow impacts on surrounding areas. Therefore, a shadow study was conducted for the Project.[124] As discussed in the shadow study, throughout the year, the Project would generate net new shadow that would fall northwest of the Project site, affecting an existing surface parking lot and portions of the sidewalks along Lorton Avenue. Sidewalks along Park Road would not receive any net new shadow from the Project between 9:00 a.m. and 3:00 p.m. on any date throughout the year. Similarly, public sidewalks along Burlingame Avenue would not receive net new shadows from the proposed building. Figures XI-1 through XI-3 depict shadow conditions on the winter/summer solstices and spring/fall equinoxes at 9:00 a.m., 12:00 p.m., and 3:00 p.m. As shown, although the proposed building would create shadows on the new Project open space, no other open spaces or public parks would be affected. The Project would be consistent with Policy D-3.2 of the Specific Plan.

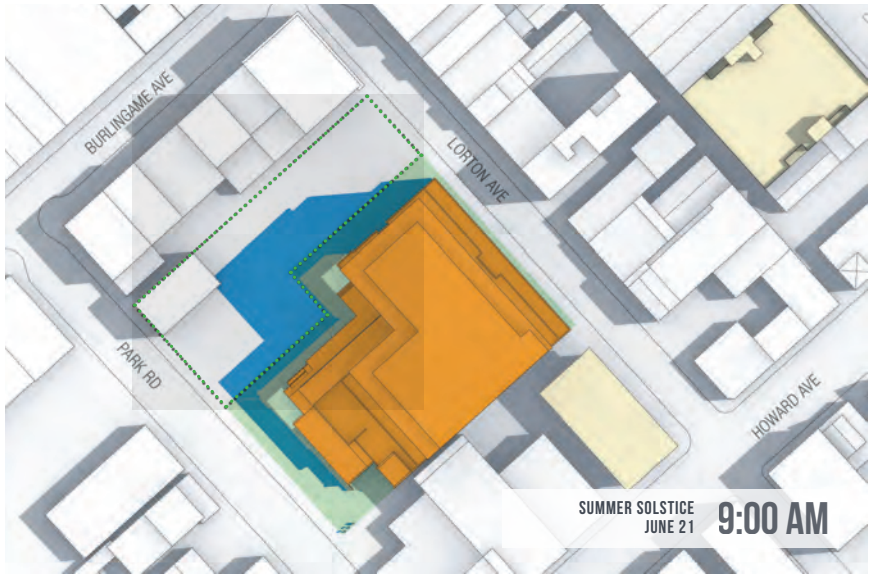
In general, the Project would be consistent with the other 2010 Specific Plan goals and policies. However, it should be noted that the ultimate determination regarding Specific Plan and General Plan consistency will be made by the Planning Commission. In addition, the ultimate findings regarding Specific Plan and General Plan consistency do not require the Project to be entirely consistent with each individual goal and policy. A project can be generally consistent with a specific plan, even though the project may not promote every applicable goal and policy. The Project would be generally consistent with Specific Plan goals and policies, resulting in a ***less-than-significant*** impact, which was adequately addressed in the Previous CEQA Documents.

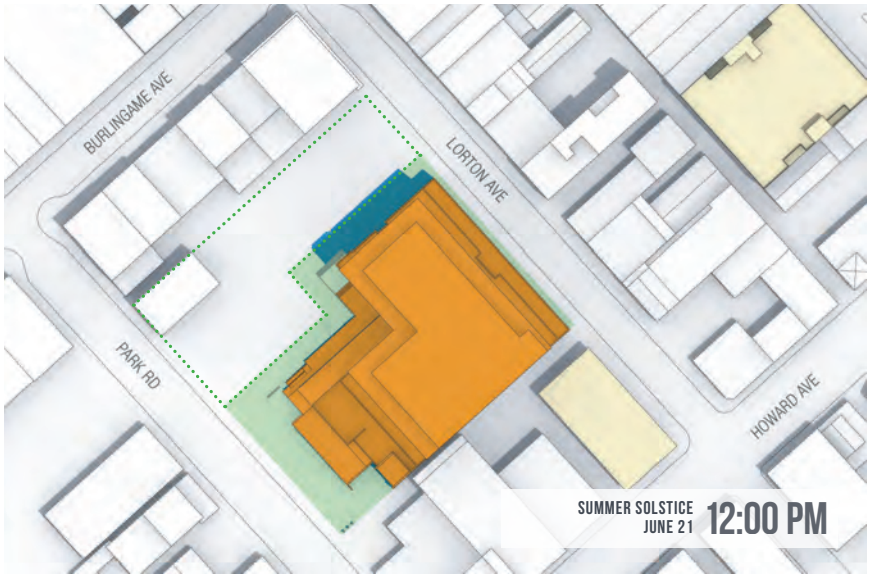
Conclusion

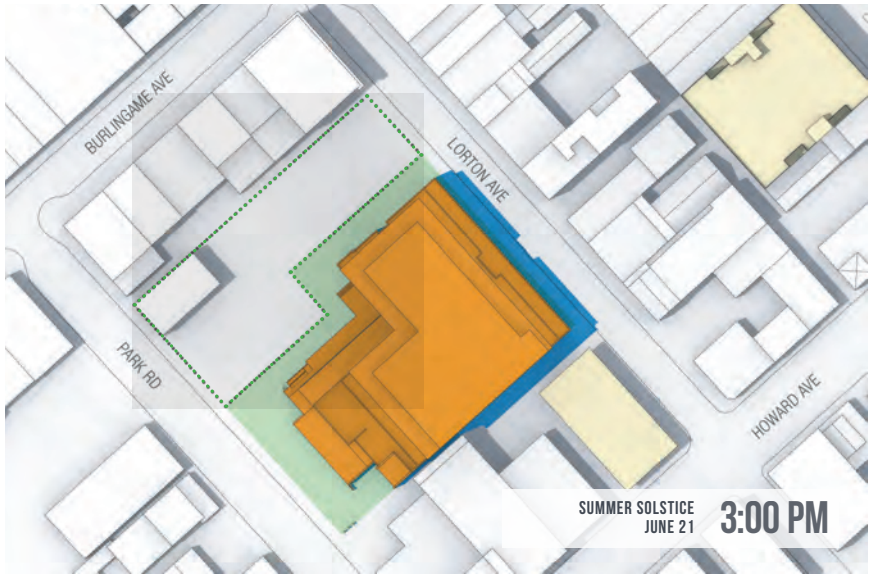
Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to land use and planning than those identified previously. Implementation of existing rules and regulations

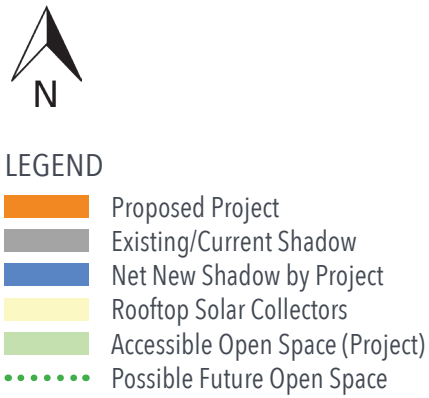
[124] Prevision Design. 2020. *220 Park Road Shadow Study*. August 5.

regarding land use, including the goals and policies in the Specific Plan and the General Plan, would ensure that potential impacts would be less than significant. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The land use and planning impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.









Source: Prevision Design, 2020

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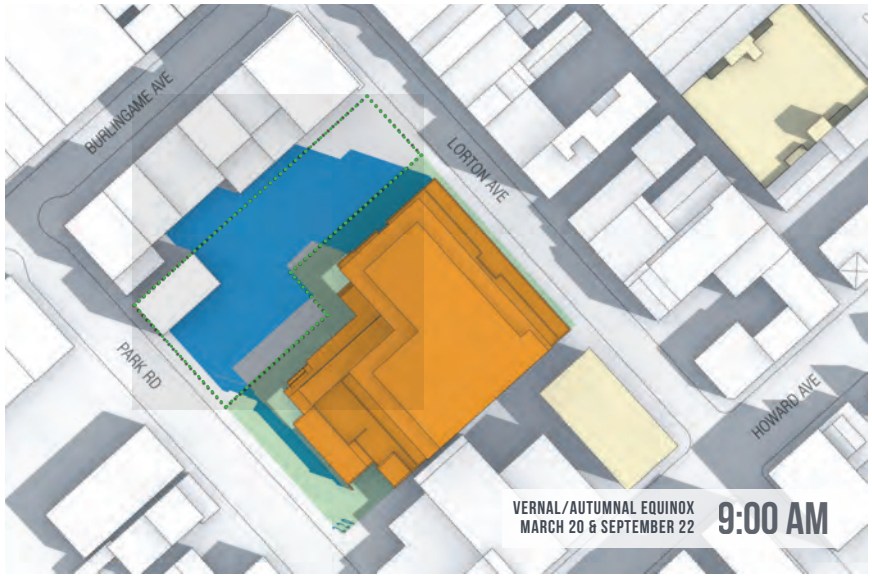
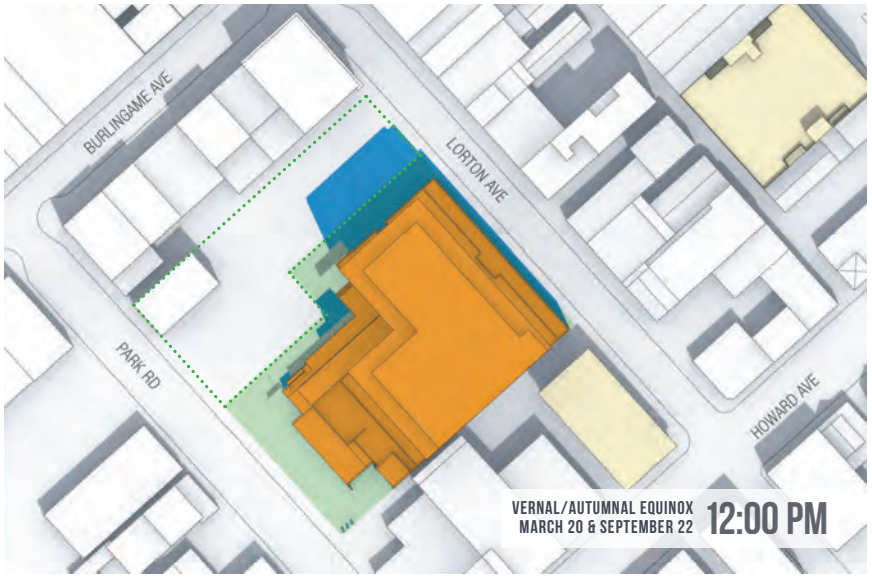
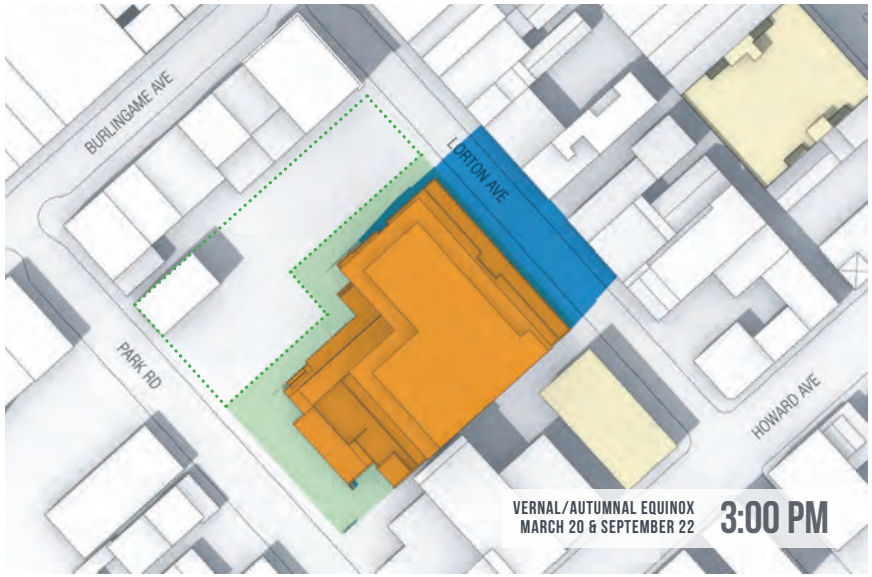
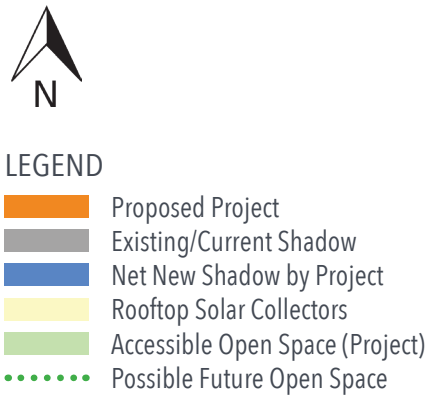
Figure XI-1
Shading Diagrams on Summer Solstice (June 21)



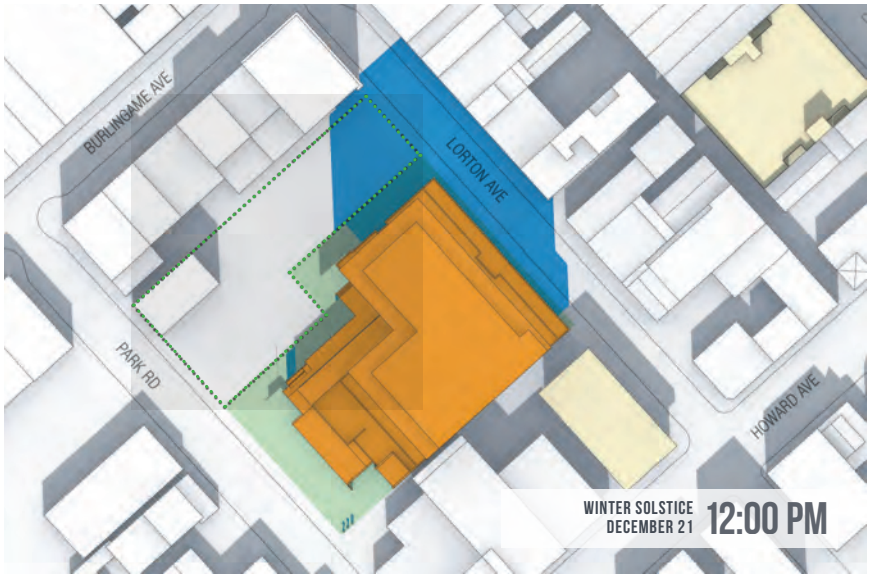


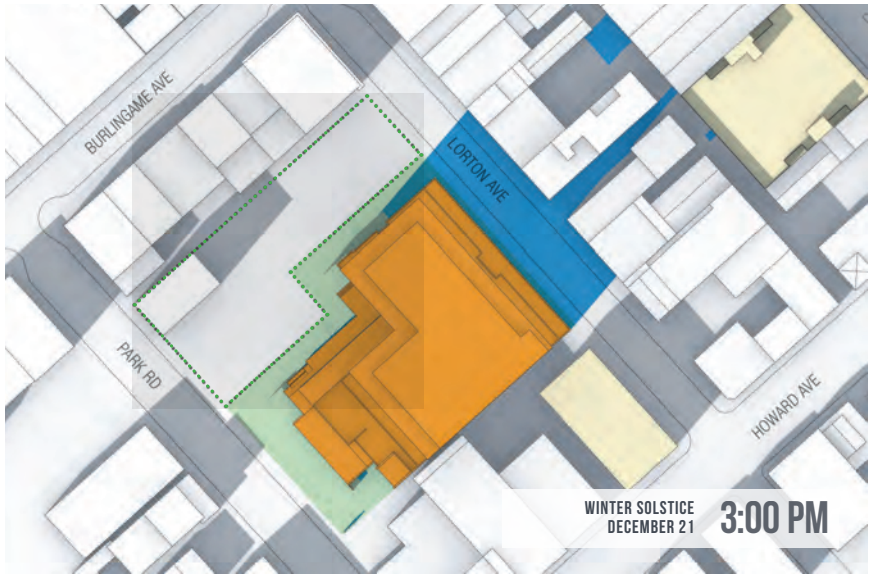




ICF Graphics ... 00351.20 (9-25-20) JC

Figure XI-2
Shading Diagrams on Vernal/Autumnal Equinoxes (March 20/September 22)





N

LEGEND

- Proposed Project
- Existing/Current Shadow
- Net New Shadow by Project
- Rooftop Solar Collectors
- Accessible Open Space (Project)
- Possible Future Open Space

Source: Prevision Design, 2020

ICF Graphics ... 00351.20 (9-25-20) JC

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Figure XI-3
Shading Diagrams on Winter Solstice (December 21)

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XII. Mineral Resources

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Setting

Under the Surface Mining Control and Reclamation Act, the California Geological Survey is responsible for classifying land as a Mineral Resource Zone (MRZ), based on the known or inferred mineral resource potential of that land. According to available data, the Project site and the area surrounding the Project site have been classified as MRZ-1.[125] The California Department of Conservation, Division of Mines and Geology, defines MRZ-1 as follows:

> **MRZ-1:** Areas where adequate geologic information indicates that no significant mineral deposits are present or where it is judged that little likelihood exists for their presence. This zone is applied where well-developed lines of reasoning, based on economic geologic principles and adequate data, indicate that the likelihood for occurrence of significant mineral deposits is nil or slight.[126]

Previous CEQA Documents

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, found no impacts related to mineral resources. No mitigation measures were warranted.

Discussion

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

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

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[125] California Department of Conservation. 1996. *Generalized Mineral Land Classification Map of the South San Francisco Bay Production—Consumption Region*. Map prepared by Susan Kohler-Antablin. California Department of Conservation, Division of Mines and Geology, Sacramento, CA. Available: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_96-03/ Accessed: February 20, 2020.

[126] California Department of Conservation. 2000. *Guidelines for Classification and Designation of Mineral Lands.* Available: https://www.conservation.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf. Accessed: February 20, 2020.

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

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

Conclusion

The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The mineral resources impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

XIII. Noise

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?	☐	☐	☐	☒
b. Generate excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☐	☒
c. Be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport and expose people residing or working in the Project area to excessive noise levels?	☐	☐	☐	☒

Setting

Overview of Noise and Sound

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

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

Human sound perception, in general, is such that a change in sound level of 1 decibel (dB) cannot typically be perceived by the human ear, a change in sound level of 3 dB is just noticeable, a change of 5 dB is clearly noticeable, and a change of 10 dB is perceived as doubling or halving the sound level. A doubling of actual sound energy is required to result in a 3 dB (i.e., barely noticeable) increase in noise; in practice, this means that the volume of traffic on a roadway typically needs to double to result in a noticeable increase in noise.[127]

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

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

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

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

Overview of Ground-borne Vibration

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

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

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

Vibration amplitude attenuates (or decreases) over distance. Attenuation is a complex function of how energy is imparted into the ground as well as the soil or rock conditions through which the vibration is traveling (variations in geology can result in different vibration levels). Table 3-13 summarizes the typical vibration levels generated by construction equipment at a reference distance of 25 feet as well as greater and lesser distances.

Table 3-13. Vibration Source Levels for Construction Equipment

Equipment	PPV at 5 Feet	PPV at 25 Feet	PPV at 50 Feet	PPV at 75 Feet	PPV at 100 Feet	PPV at 175 Feet
Pile driver (sonic)	1.900	0.170	0.0601	0.0327	0.0213	0.0092
Large bulldozer	0.995	0.089	0.0315	0.0171	0.0111	0.0048
Hoe ram	0.995	0.089	0.0315	0.0171	0.0111	0.0048
Caisson drill	0.995	0.089	0.0315	0.0171	0.0111	0.0048
Loaded trucks	0.849	0.076	0.0269	0.0146	0.0095	0.0041
Jackhammer	0.391	0.035	0.0124	0.0067	0.0044	0.0019
Small bulldozer	0.033	0.003	0.0011	0.0006	0.0004	0.0002

Source: Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment Manual*. Office of Planning and Environment. Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed: August 31, 2020.

Existing Noise Environment

The existing noise sources in the Project area include local traffic and commuter trains. Similar to most urban areas, the Project area is dominated by traffic and train noise. The Project site is approximately 500 feet from California Drive and 750 feet from the Caltrain corridor. At the nearest segment of California Drive, existing noise levels from traffic are estimated to be in the range of 68.2 to 68.9 dBA CNEL, according to the 2040 General Plan. In terms of 24-hour noise exposure, existing noise levels at the Project site are typical of an urban environment, with values of 55 to 65 dBA CNEL.[128]

In past years, noise measurements were conducted at nearby locations for City planning environmental documents. Measurements for the 2040 General Plan EIR in October 2017 were conducted at two locations. At the corner of California Drive and Bayswater Avenue, a sound level range of 66.9 to 67.2 dBA L_{eq} was measured over a period of 30 minutes in a residential/commercial area. At the corner of Palm Drive and Acacia Drive, a sound level range of 53.8 to 56.6 dBA L_{eq} was measured over a period of 30 minutes in a residential neighborhood. For the Specific Plan, a 10-minute measurement was conducted near the corner of Howard Avenue and Lorton Avenue; the overall sound level was 63.8 dBA L_{eq}.

[128] Cowan, J. P. 1994. *Handbook of Environmental Acoustics.* New York, NY: Van Nostrand Reinhold.

Noise-Sensitive Land Uses

Noise-sensitive land uses are generally defined as locations where people reside or the presence of unwanted sound could adversely affect use of the land. Noise-sensitive land uses typically include residential areas, health care facilities, lodging facilities, and schools. Recreational areas where quiet is an important part of the environment can also be considered sensitive to noise. Some commercial areas may be considered noise sensitive as well, such as outdoor restaurant seating areas.

The Project site is adjacent to commercial and office buildings with no apparent outdoor use areas. Refer to Table 3-6 for a list of nearby sensitive receptors. As noted, the nearest residence is within a building at 232 Park Road, less than 50 feet from the edge of the Project site.

Regulatory Setting

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

With respect to local noise standards, two regulatory sources are applicable to the Project: the 2040 General Plan and the City Municipal Code. The applicable noise standards from these two sources are described below.

2040 General Plan

Chapter 8, Community Safety Element, of the 2040 General Plan establishes noise and land use compatibility standards to guide new development. It provides goals and policies to reduce the harmful and annoying effects of excessive noise in the city. The policies relevant to the Project include:

- Locating noise-sensitive uses away from major sources of noise (Policy CS-4.1)
- Requiring the design of both new residential development and office development to comply with protective noise standards (Policies CS-4.2 and CS-4.3, respectively)
- Monitoring noise impacts from aircraft operations at SFO as well as noise at Mills-Peninsula Medical Center (Policy CS-4.7)
- Requiring the evaluation and, if necessary, mitigation of airport noise impacts if a project is within the 60 dBA CNEL contour line of SFO (Policy CS-4.8)
- Complying with real estate disclosure requirements pertaining to existing and planned airports within 2 miles of any sale or lease of a property (Policy CS-4.9)
- Requiring development projects that are subject to discretionary approval to assess potential construction noise impacts on nearby sensitive uses and minimize impacts consistent with the City Municipal Code (Policy CS-4.10)
- Requiring a vibration impact assessment for projects that would use heavy-duty equipment and be within 200 feet of an existing structure or sensitive receptor (Policy CS-4.13)

Also in the Community Safety Element of the 2040 General Plan are noise compatibility criteria for each category of land use in the city. Multi-family residential land uses are considered conditionally acceptable at noise levels between 60 dBA and 70 dBA CNEL, which means that new development should be undertaken only after a detailed analysis of noise reduction requirements is conducted and noise insulation features have been included in the design. Less noise-sensitive land uses, such as commercial and industrial uses, are considered compatible with higher levels of outdoor noise.

City of Burlingame Municipal Code

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

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

Previous CEQA Document Findings

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, found less-than-significant impacts related to noise with implementation of mitigation measures, SCAs, and/or General Plan goals and policies. The Specific Plan IS/MND determined that projects in the Specific Plan area could increase outdoor noise levels during construction; however, Mitigation Measure J-1/SCA-19 would reduce the impact to less than significant. In addition, although temporary increases in ambient noise and vibration levels could occur during construction, Mitigation Measure J-2/SCA-20 would reduce the impact to less than significant.

Per the General Plan EIR, the following goals and policies from the Community Safety Element would reduce the impacts of future projects to less-than-significant levels: Goal CS-4, Policy CS-4.1, Policy CS-4.2, Policy CS-4.3, Policy CS-4.4, Policy CS-4.5, Policy CS-4.6, Policy CS-4.7, Policy CS-4.8, Policy CS-4.9, Policy CS-4.10, Policy CS-4.11, Policy CS-4.12, and Policy CS-4.13. The General Plan establishes an overall goal that is intended to protect residents from excessive construction noise and vibration as well as increases in permanent ambient noise as a result of individual projects. The General Plan goals and policies require assessments as well as minimization of potential noise impacts on sensitive receptors, thereby reducing impacts to less than significant.

Discussion

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

Construction Noise

During construction, the Project would temporarily relocate a portion of the historic Post Office building and demolish the remainder of the building, along with associated surface parking. The Project would then move the historic building back to its original location, rehabilitate the structure, and construct a new office/retail building with associated amenities. A two-level underground parking garage would also be constructed. Demolition and construction activities would generate noise, resulting in a temporary increase in noise levels at adjacent land uses. All construction activities would comply with the time-of-day restrictions specified in the City Municipal Code, as discussed above. In addition, the Project Sponsor would be required to adhere to Specific Plan SCA-19, which requires implementation of BMPs to reduce construction noise.

The significance of potential noise impacts resulting from demolition and construction would depend on the noise generated by the various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive receptors. To determine potential noise levels during construction, the Federal Transit Administration (FTA) source noise levels for construction equipment were used to calculate overall noise levels for each construction phase. Table 3-14 shows average noise levels at 50 feet, based on FTA data for the equipment that is expected to be used for Project construction.

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

Equipment	Typical Noise Level (dBA) 50 Feet from Source
Auger drill rig	85
Heavy truck	84
Excavator	85
Bulldozer	85
Crawler crane	83
Pump	77
Generator	82
Concrete mixer	85
Grader	85
Compactor	82
Impact hammer (hoe ram)	90

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

To provide a reasonable worst-case analysis of potential noise impacts from concurrent use of various pieces of construction equipment during Project construction, construction noise modeling was conducted. The modeling assumed that the two loudest pieces of equipment proposed for use during each construction phase would operate simultaneously at the same location on the Project site. Table 3-15 identifies the combined noise level, in terms of L_{eq}, from operation of the two loudest pieces of construction equipment during each phase at increasing distances from the Project site.

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

Construction Activity	Equipment Used[a]	Combined Source Level at 50 Feet (L_{eq}, dBA)[b]	Combined Source Level at 150 Feet (L_{eq}, dBA)[b]	Combined Source Level at 300 Feet (L_{eq}, dBA)[b]	Combined Source Level at nearest Receiver at 500 Feet (L_{eq}, dBA)[b]
Demolition	Hoe ram, truck	88	78	72	65
Excavation	Excavator, drill	85	75	69	62
Foundation	Grader, crane	84	75	69	61
Building construction	Grader, crane	84	75	69	61
Site improvements	Backhoe, concrete saw	87	78	72	65
Exterior closeout	Grader, crane	84	75	69	61

Note: Distance calculation does not include the effects, if any, of local shielding from walls, topography, or other barriers, which may further reduce sound levels.

L_{eq} = equivalent sound level; dBA = A-weighted decibel.

a. The two loudest pieces of equipment that may operate in one location simultaneously.

b. Based on usage factors of 50 percent to 100 percent for the types of equipment used.

The nearest residential units are within the building at 232 Park Road, across the parking lot at the west of the Project site. The nearest portion of the excavation perimeter is about 50 feet away from this building. Construction noise levels could be as high as 88 dBA during site demolition, which would very likely be the loudest phase of construction. A noise level of this magnitude would be readily noticeable above ambient levels at this location.

As described above, construction would result in a noticeable increase in ambient noise at residential units in the area of the Project site. However, construction would occur only during the daytime hours allowed by the City; no nighttime work is anticipated. As described above, the Project Sponsor would be required to implement SCA-19, which would reduce noise levels from equipment in the area to the extent feasible. Therefore, this impact would be ***less than significant***. No mitigation is required.

Operational Noise

Traffic

During operation, traffic would increase on roadways in the vicinity as employees and visitors travel to and from the Project site. Traffic noise increases with increasing traffic volumes. A 100 percent increase (i.e., a doubling) in average daily traffic (ADT) equates to a 3 dB increase in noise. As

discussed above, an increase of 3 dB is just noticeable by the human ear; therefore, an increase of less than 3 dB is not considered to be a substantial increase. An increase threshold of 3 dB is used for evaluating traffic noise impacts in Chapter 15 of the General Plan EIR and, therefore, used in this analysis.

Traffic noise levels were calculated using peak-hour traffic volume data provided by the Project traffic consultant as well as the traffic noise emissions in the data tables developed by the Federal Highway Administration with use of the Traffic Noise Model, version 2.5. As shown in Table 3-16, traffic noise levels at modeled receiver locations under existing plus-Project conditions are predicted to be in the range of 55 to 62 dBA CNEL, accounting for all types of land uses in the study area. Under cumulative conditions, traffic noise levels are predicted to range from 56 to 62 dBA CNEL (Table 3-17).

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

Roadway	Segment Location	Existing CNEL	Existing plus-Project CNEL	Increase, Existing plus-Project minus Existing (dB)	Background CNEL	Background plus-Project CNEL	Increase (dB)
Lorton Avenue	Burlingame Avenue to Howard Avenue	61	62	+ 1	62	62	0
Lorton Avenue	Howard Avenue to Bayswater Avenue	62	62	0	62	62	0
Howard Avenue	Lorton Avenue to Primrose Road	58	58	0	58	58	0
Park Road	East of Howard Avenue	61	62	+ 1	62	62	0
Primrose Road	East of Howard Avenue	55	55	0	55	55	0

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

Roadway	Segment Location	Cumulative No-Project CNEL	Cumulative plus-Project CNEL	Increase (dB)
Lorton Avenue	Burlingame Avenue to Howard Avenue	62	62	0
Lorton Avenue	Howard Avenue to Bayswater Avenue	62	62	0
Howard Avenue	Lorton Avenue to Primrose Road	58	58	0
Park Road	East of Howard Avenue	62	62	0
Primrose Road	East of Howard Avenue	56	56	0

With respect to background conditions, which represent traffic growth from projects that are approved but not yet constructed, traffic volumes in the Project area would increase, even in the absence of the Project. Under background conditions, the Project would result in an increase in noise of less than 1 dB, which would not be noticeable. Traffic volume data were also provided for a cumulative scenario, corresponding to cumulative growth in the city and based on 2040 General Plan development assumptions. This scenario includes more background growth in the Project area than under the background conditions described above. The cumulative condition accounts for increased traffic volumes from other planned development in the area (i.e., a cumulative no-Project scenario) as well as future development plus growth from the Project (i.e., a cumulative plus-Project scenario).

Based on the data in Tables 3-15 and 3-16, traffic volumes would increase by 1 dB or less under existing plus-Project, background plus-Project, and cumulative plus-Project conditions. An increase of this magnitude would not be perceptible. Therefore, the impact of traffic noise under Project conditions would be ***less than significant***.

HVAC Equipment

The new building at the Project site would require HVAC systems. Although specific noise-level data for this type of equipment are not available, typical HVAC equipment can produce sound levels in the range of 70 to 75 dBA at 50 feet, depending on the size of the equipment.[129] Rooftop HVAC units would be both a horizontal and a vertical distance from existing buildings; operational noise would attenuate over this distance. Although the Project would produce the same type of noise as produced at existing buildings in the area, the new building would be seven stories (94 feet); therefore, the noise source would be farther from the ground, shielded by the edge of the building, and less likely to be noticeable. However, the equipment should not exceed the applicable noise limits at the property line (60 dBA during daytime hours or 50 dBA during nighttime hours).

Emergency Generator

An emergency generator would be installed at the Project site. The emergency generator would create temporary noise during power outages and testing, which would be done once or twice per year. Generators for buildings are typically contained within a sound-attenuating enclosure. In

[129] Hoover and Keith. 2000. *Noise Control for Buildings and Manufacturing Plants*.

general, sound levels from emergency generators vary, based on placement, the type of generator, and the noise attenuation incorporated into the design. Noise from the generator would be infrequent and short term. It is not likely that operation of the generator would cause noticeable noise at the nearest noise-sensitive land uses. However, regardless of the impact on existing land uses, the generator would need to comply with a 60 dBA noise limit at the property line during the daytime hours of 7:00 a.m. to 10:00 p.m. and 50 dBA during the nighttime hours of 10:00 p.m. to 7:00 a.m. Under a worst-case scenario, generator noise may exceed 60 dBA at the property line during daytime hours or 50 dBA during nighttime hours. Therefore, impacts from emergency generator operation would be potentially significant. Mitigation Measure NOISE-1 would require acoustical treatments for the proposed emergency generator to reduce noise to a level that would be below the acceptable noise limit. The impact would be ***less than significant with mitigation*** and was adequately addressed in the Previous CEQA Documents.

Mitigation Measure NOISE-1: Provide Acoustical Treatments for Mechanical Equipment

The Project Sponsor shall provide acoustical treatments for the proposed emergency generator to ensure that noise levels do not exceed the 60 dBA L_{eq} daytime threshold for mechanical equipment. In addition, the Project Sponsor shall provide acoustical treatments as needed for the proposed HVAC equipment to ensure noise levels do not exceed the nighttime noise limit of 50 dBA L_{eq} at the property line. These limits are in accordance with the noise limitations specified in the City Municipal Code. Any required acoustical treatments can be specified by retaining a qualified acoustical consultant. Treatments may include, but are not limited to:

- Installing stationary equipment as far as possible from offsite noise-sensitive land uses and the property line to reduce noise levels at adjacent parcels,
- Constructing enclosures around noise-generating mechanical equipment,
- Placing barriers around the equipment,
- Using mufflers or silencers on equipment exhaust fans,
- Orienting or shielding equipment to protect sensitive uses to the greatest extent feasible, and
- Limiting the testing of emergency generators to daytime hours (7:00 a.m. to 10:00 p.m.)

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

Construction would require the use of heavy equipment that produces ground-borne vibration, which may damage adjacent structures and cause human annoyance if operated near sensitive receptors. The two pieces of equipment proposed for construction that would generate the greatest vibration levels are a drill (to install hold-downs) and a hoe ram. As indicated in Table 3-13, these two pieces of equipment generate approximately the same vibration levels (PPV of 0.089 inch per second at 25 feet). No high-impact equipment, such as a pile driver, is expected to be used during construction.

The nearest residence is within 50 feet of the Project site. The Project site is adjacent to office buildings with frontage along Howard Avenue.

Building Damage

The Project site is in a largely commercial area, with buildings that are generally considered to be modern. For a worst-case scenario, some buildings in the vicinity of the Project site may be considered "historic or old buildings," as defined by the California Department of Transportation (Caltrans).[130] The thresholds for damage potential associated with these categories are a PPV of 0.25 and 0.30 inch per second, respectively (for continuous/frequent intermittent sources of vibration).

Table 3-18 summarizes the guidelines developed by Caltrans for damage potential from transient and continuous vibration associated with construction activity. Activities that can cause continuous vibration include the use of excavation equipment, static compaction equipment, tracked vehicles, vibratory pile drivers, pile extraction equipment, and vibratory compaction equipment.

Table 3-18. Vibration Damage Potential Threshold Criteria Guidelines

	Maximum PPV (in/sec)	
Structure and Condition	**Transient Sources[a]**	**Continuous/Frequent Intermittent Sources[b]**
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: California Department of Transportation. 2020. *Transportation and Construction Vibration Guidance Manual*. April. Available: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf. Accessed: May 4, 2020

Notes:

a. Transient sources create a single isolated vibration event (e.g., blasting or use of drop balls).

b. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

The two types of equipment with the greatest potential to cause ground-borne vibration (a drill and a hoe ram) would generate vibration levels at a reference distance of 25 feet (PPV of 0.089 inch per second, as shown in Table 3-13) that would be well below the levels for damage potential (PPV of 0.25 inch per second for historic and some older buildings, as shown in Table 3-18). The nearest residential buildings are more than 25 feet from the excavation boundary; therefore no damage is anticipated to occur at any residential buildings as a result of Project construction. However, there is one commercial building adjacent to the eastern boundary of the excavation zone; another is approximately 20 feet away. During use of the drill, hoe ram, or bulldozer, vibration levels at the office building immediately adjacent to the site may exceed a PPV of 0.5 inch per second on an intermittent basis. This level is expected to decrease to a PPV of 0.352 inch per second at a distance of 10 feet, which would be below the threshold PPV of 0.5 inch per second. However, use of these types of heavy equipment would exceed the damage thresholds at the nearest building at a distance of less than 10 feet.

130 California Department of Transportation. 2020. *Transportation and Construction Vibration Guidance Manual*. Sacramento, CA. April.

During construction activities at the Project site, the historic Post Office building would be moved from its current location. It would be temporarily stored at the adjacent parking lot west of its current location. During demolition and new construction at the Project site, the Post Office building would be exposed to continuous vibration from heavy equipment such as hoe rams, drill rigs, and bulldozers. Because the Post Office building is constructed of poured concrete, it is unlikely that it would be considered a fragile building. However, the Post Office building may contain non-structural features of historic significance that would be susceptible to vibration damage at relatively low levels (PPV of approximately 0.08 inch per second, as shown in Table 3-18). As such, the potential for vibration damage is considered significant. With implementation of Mitigation Measure NOISE-2, vibration impacts would be ***less than significant***.

Mitigation Measure NOISE-2: Prepare a Vibration Control Plan to Avoid or Minimize Vibration Impacts on the Historic Post Office Building

Prior to the start of construction, a vibration control plan shall be prepared to describe the specific methods that the contractor will use to avoid vibration impacts on the historic Post Office building during removal and temporary relocation, as applicable. The plan shall include a building inspection and conditions report prior to construction, which will determine the need for ongoing monitoring or subsequent inspections. Because of the historic status of the building, the plan shall provide details on how vibration from Project demolition and the operation of heavy equipment near this building at the original and/or the new building site will be addressed. If determined at the temporary site that the potential for damage to the building during construction is high, the temporary location for building storage shall be modified so that vibration from construction will be below the applicable damage threshold for the building.

Annoyance during Equipment Use

Table 3-19 summarizes the guidelines developed by Caltrans for annoyance potential from transient and continuous vibration associated with construction activity. As shown in Table 3-19, the limit of perceptibility for ground-borne vibration is a PPV of 0.01 inch per second. Note that people are generally more sensitive to vibration during nighttime hours (when sleeping) than during daytime hours.

At a PPV value of 0.089 inch per second at 25 feet, occasional activity from equipment may cause vibration that would be more than distinctly perceptible but less than strongly perceptible on an intermittent basis, based on the thresholds for continuous sources in Table 3-19. This level of vibration, 0.089 inch per second, would be infrequent because most of the area within the perimeter of excavation would be more than 25 feet from the nearest adjacent building. As such, construction equipment is not anticipated to be a source of chronic annoyance at adjacent buildings; however, vibration from equipment may cause strongly perceptible vibration within the nearest office buildings at a distance of 25 feet or less.

As discussed in the 2040 General Plan EIR, vibration from on-road vehicles would not exceed any thresholds recommended by the FTA or Caltrans. No vibration impacts during Project operations would occur.

Table 3-19. Vibration Annoyance Potential Criteria Guidelines

	Maximum PPV (in/sec)	
Human Response	**Transient Sources[a]**	**Continuous/ Frequent Intermittent Sources[b]**
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.9	0.10
Severe	2.0	0.4

Source: California Department of Transportation. 2020. *Transportation and Construction Vibration Guidance Manual*. April. Available: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf. Accessed: May 4, 2020.

Notes:

a. Transient sources create a single isolated vibration event (e.g., blasting or use of drop balls).

b. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Vibration from heavy equipment used during construction could cause building damage at the adjacent office building at 1290 Howard Avenue and annoyance within office buildings at both 1200 Howard Avenue and 1290 Howard Avenue. This impact is therefore considered to be significant. The Project Sponsor would be required to implement Specific Plan SCA-20, which would require measures to reduce construction vibration impacts on existing residential uses. With implementation of Mitigation Measure NOISE-3, specific to this Project, vibration impacts would be ***less than significant with mitigation***.

Mitigation Measure NOISE-3: Employ Vibration-Reducing Practices and Complaint Reporting during Construction

As construction conditions permit, heavy vibration-producing equipment such as hoe rams, bulldozers, and drill rigs will be located at least 25 feet away from adjacent office buildings. During construction, if this type of equipment is required inside 25 feet, alternative techniques that rely on smaller equipment types shall be used. If the use of heavy equipment is required within 25 feet of buildings and no equipment alternatives are feasible, a designated coordinator shall be responsible for handling and responding to any complaints received during such periods of construction. A reporting program shall be required that documents complaints received, actions taken, and the effectiveness of these actions in resolving disputes.

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

The Project site lies approximately 300 feet from the southern boundary of Airport Influence Area B of SFO. The nearest runway at SFO is 2.2 miles away from the Project site, with a flight path in a southeasterly direction over San Francisco Bay. The Project site is well outside the 65 dBA CNEL contour. As such, no exceedances of Federal Aviation Administration criteria are expected. There are no apparent private airstrips or general aviation airports within 2 miles of the Project. This impact is considered to be ***less than significant***.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to noise and vibration than those identified previously. Implementation of existing rules and regulations governing noise and vibration, including Specific Plan SCA-19 and SCA-20 and the City's General Plan goals and policies, would ensure that potential impacts associated with noise and vibration would be less than significant. In addition, implementation of Mitigation Measures NOISE-1 and NOISE-2, specific to the Project, would reduce emergency generator noise impacts and construction vibration impacts on nearby receptors to less than significant. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The noise and vibration impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

XIV. Population and Housing

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through the extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Setting

The Project site is developed with the Post Office building and accompanying features; however, the site has been unoccupied since 2015. Therefore, no individuals currently reside or work at the Project site.

Population. According to the California Department of Finance, the city had a population of approximately 30,320 as of January 1, 2020.[131] Table 3-20 shows ABAG population projections for the city, county, and Bay Area as a whole. As shown, the city population will increase by approximately 1,075 (3.6 percent) by 2025. Projections also indicate that population growth in Burlingame will exceed population growth in the county between 2020 and 2025 (2.5 percent) but be less than that of the Bay Area as a whole (4.6 percent).[132]

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

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

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

[131] California Department of Finance. 2020. *E-1 Population Estimates for Cities, Counties, and the State with Annual Percent Change—January 1, 2019 and 2020.* Sacramento, CA. May. Available: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-1/. Accessed: September 3, 2020.

[132] Association of Bay Area Governments. 2018. *Plan Bay Area Projections 2040: A Comparison to Plan Bay Area 2040.* November. Available: https://abag.ca.gov/planning/research/forecasts.html. Accessed: April 30, 2020.

Housing. In 2018, the estimated number of housing units in the city was 12,755,[133] with an average size of 2.49 persons per household.[134] That same year, the city had a housing vacancy rate of approximately 5.7 percent (726 units).[135] In addition, the city had approximately 1.42 workers per worker household.[136]

Table 3-21 presents ABAG projections for households in the city, county, and Bay Area for 2020 to 2025. The number of households in the city is projected to grow from approximately 12,755 in 2020 to 13,190 units in 2025, an increase of approximately 3.4 percent. According to ABAG, the number of households in the county is projected to grow by approximately 2.1 percent, while the Bay Area is expected to grow by approximately 4.4 percent in 5 years.[137]

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

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

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

Employment. Table 3-22 presents ABAG projections for the number of jobs in the city, county, and Bay Area for 2020 to 2025. The number of jobs in the city is projected to increase by approximately 0.4 percent because of employment increases in the retail, government, construction, education, and financial sectors; decreases are projected in the manufacturing, wholesale, and transportation sectors. Overall, job growth in the city (0.4 percent) is expected to be lower than job growth in the county (4.0 percent) and the Bay Area (3.2 percent).[138] In Burlingame, the categories with the highest employment levels are transportation, warehousing, and utilities, representing nearly one-third of the jobs in the city. More than 11 percent of the jobs are in the arts, entertainment, recreation, and accommodation and food services.[139]

133 U.S. Census Bureau. 2018. *Selected Housing Characteristics, Burlingame, California*. The 2014–2018 American Community Survey, 5-year Estimates, Data Profiles. ID DP04. Available: https://www.census.gov/acs/www/data/data-tables-and-tools/data-profiles/. Accessed: April 30, 2020.

134 U.S. Census Bureau. 2018. *Selected Social Characteristics in the United States, Burlingame, California*. The 2014–2018 American Community Survey, 5-year Estimates, Data Profiles. ID DP02. Available: https://www.census.gov/acs/www/data/data-tables-and-tools/data-profiles/. Accessed: April 30, 2020.

135 U.S. Census Bureau. 2018. *Selected Housing Characteristics, Burlingame, California*. The 2014–2018 American Community Survey, 5-year Estimates, Data Profiles. ID DP04. Available: https://www.census.gov/acs/www/data/data-tables-and-tools/data-profiles/. Accessed: April 30, 2020.

136 U.S. Census Bureau. 2018. *Selected Economic Characteristics, Burlingame, California*. The 2014–2018 American Community Survey, 5-year Estimates, Data Profiles. ID DP03. Available: https://www.census.gov/acs/www/data/data-tables-and-tools/data-profiles/. Accessed: April 30, 2020.

137 Association of Bay Area Governments. 2018. *Plan Bay Area Projections 2040: A Comparison to Plan Bay Area 2040.* November. Available: https://abag.ca.gov/planning/research/forecasts.html. Accessed: April 30, 2020.

138 Ibid.

139 City of Burlingame. 2015. *City of Burlingame: 2015–2023 Housing Element*. Adopted: January 5, 2015. Available: https://www.burlingame.org/document_center/Planning/General%20and%20Specific%20Plans/Housing%20Element%20-%20updated%202015.pdf. Accessed: April 30, 2020.

Table 3-22. Job Projections (2020 to 2025)

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

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

In 2018, approximately 17,190 city residents were employed.[140] Approximately 12 percent of employees work and live in Burlingame, while 22 percent work in other cities around San Mateo County, 18 percent work in San Francisco, 10 percent work in Santa Clara County, and 7 percent work in the East Bay.[141]

Previous CEQA Documents

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

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

Discussion

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

Construction. Construction of the Project would increase construction employment directly; however, this would be temporary, occurring only during the 3-year construction period. The size of the construction workforce would vary during the different phases of construction. The maximum number of construction workers on a peak day would be approximately 100. Given the relatively common nature of the anticipated construction, the demand for construction employment would most likely be met with the existing and future labor market in the city as well as San Mateo County. A substantial number of workers from outside the city or county would not be expected to relocate temporarily or commute long distances. Therefore, impacts associated with inducing substantial population growth during construction would be less than significant.

[140] U.S. Census Bureau. 2018. *Selected Economic Characteristics, Burlingame, California*. The 2014–2018 American Community Survey, 5-year Estimates, Data Profiles. ID DP03. Available: https://www.census.gov/acs/www/data/data-tables-and-tools/data-profiles/. Accessed: April 30, 2020.

[141] City of Burlingame. 2015. *City of Burlingame: 2015–2023 Housing Element*. Adopted: January 5, 2015. Available: https://www.burlingame.org/document_center/Planning/General%20and%20Specific%20Plans/Housing%20Element%20-%20updated%202015.pdf. Accessed: April 30, 2020.

Operation. Operation of the Project would not result in a direct population increase because no onsite residential units are proposed. However, the Project would result in 510 office employees and up to 32 retail employees working on the site once the Project is fully operational. Because no employees currently work at the Project site, the Project would result in a net increase in the total number of employees at the Project site during operation (i.e., approximately 542 employees). This level of job growth represents approximately 1.7 percent of the projected number of jobs in the city by 2025, which is the first year that the Project would be fully operational.

Using the average number of workers per worker household for the city (1.42), the Project would generate approximately 381 new households. As discussed above, approximately 12 percent of all city residents also work in the city. The existing 12 percent of the city's workforce that also resides in the city was used to estimate the number of new workers who would seek and find housing in the city as a result of the Project. Therefore, approximately 46 of the projected employees at the Project site would be expected to live in the city.[142] Assuming each employee forms a household with the city average of 2.49 persons, the Project would result in approximately 115 additional residents, representing approximately 10.7 percent of the anticipated population growth in the city by 2025.

As shown in Table 3-21, above, ABAG estimates that the number of households in the city will grow by approximately 435 between 2020 and 2025. The Project would generate demand for 46 housing units in the city. Therefore, the Project-induced housing demand would equate to 10.6 percent of the projected housing demand by 2025. In 2019, the City entitled the construction of 285 net new units, along with "in progress" applications for approximately 412 new units.[143] New residents induced by the jobs at the Project site could be accommodated within this new construction. With the housing units proposed under the Project, as well as current housing development projects throughout the city, additional housing would not be needed. Therefore, the Project would not directly result in substantial population growth beyond what is expected for the city.

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

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142 The 542 net new Project employees/1.42 workers per worker household × 12 percent of Burlingame employees who also live in the city = approximately 46 employees who would live in the city.

143 City of Burlingame. 2020. *Staff Report: Housing Element, Annual Progress Report on Implementation of the Housing Element of the General Plan.* March 16. Available: https://www.burlingame.org/document_center/Planning/2019_HE-APR.pdf. Accessed: April 30, 2020.

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

The Project would include partial demolition and partial rehabilitation of the existing Post Office building. However, because the Project site is currently unoccupied, the Project would not displace people or housing and would not necessitate the construction of replacement housing elsewhere. The Project would result in ***no impact***; this was adequately addressed in the Previous CEQA Documents.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to population and housing than those identified previously. Implementation of the City's General Plan goals and policies would ensure that potential impacts associated with population and housing would be less than significant. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The population and housing impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

XV. Public Services

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

Setting

Fire Protection

The Central County Fire Department (CCFD) provides fire protection services within Burlingame, Millbrae, and Hillsborough. In total, the CCFD service area covers almost 15 square miles, with a residential population of approximately 61,344. CCFD has 87 full-time employees, including 78 uniformed personnel.[144] There are six fire stations in the CCFD's jurisdiction, two of which are in Burlingame. The closest CCFD station to the Project site is Fire Station No. 34, at 799 California Drive in Burlingame, approximately 0.55 mile north of the Project site.[145] The CCFD's goal is to keep response times under 7 minutes. The current response time for the CCFD is approximately 4 minutes, 30 seconds for 98 percent of emergency calls.[146]

Police Protection

The Burlingame Police Department (BPD) provides emergency police services within a 5-square-mile area with approximately 30,000 residents.[147] BPD has one police station at 1111 Trousdale Drive. BPD employs 69 men and women, including 40 full-time sworn officers, resulting in a ratio of 1.30 officers per 1,000 residents.[148] The Specific Plan and the 2040 General Plan Community Safety Element do not

144 Central County Fire Department. 2019. *Fiscal Year 2019–2020 Adopted Budget*. Available: http://www.ccfdonline.org/wp-content/uploads/2019/05/ADOPTED-BUDGET-FY19-20-WEB.pdf. Accessed: July 31, 2020.

145 Ibid.

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

147 City of Burlingame Police Department. 2018a. *Police*. Available: https://www.burlingame.org/departments/police_department/index.php. Accessed: February 13, 2020.

148 City of Burlingame Police Department. 2018b. *About Us*. Available: https://www.burlingame.org/departments/police_department/about_us.php. Accessed: July 31, 2020.

designate a standard ratio for police officers to residents or a standard emergency response time. However, the 2040 General Plan does require continued maintenance of optimal police staffing levels to meet community safety needs.[149] The current emergency response time is 4 minutes, 37 seconds.[150]

Schools

The Burlingame School District (BSD) is responsible for six elementary schools and one intermediate school.[151] Total student enrollment was 3,534 in the 2019–2020 school year.[152] In addition, Burlingame High School, part of the San Mateo Union High School District (SMUHSD), is located in Burlingame.[153] In total, the SMUHSD serves approximately 9,000 students, and enrollment grows every year.[154]

The Project site is within the service area for Washington Elementary School. It is also within the service area for Burlingame Intermediate School and Burlingame High School.[155] Table 3-23 provides enrollment information for the three schools from the 2019–2020 school year, the most recent data available.

Table 3-23. Public Schools Serving the Project Area

School	2019–2020 School Year Enrollment
Washington Elementary School	375[a]
Burlingame Intermediate School	1,113[b]
Burlingame High School	1,528[c]

Source: California Department of Education, 2020.

a. California Department of Education. 2020. *Washington Elementary*. Available: http://www.ed-data.org/school/San-Mateo/Burlingame-Elementary/Washington-Elementary. Accessed: August 3, 2020.

b. California Department of Education. 2020. *Burlingame Intermediate*. Available: http://www.ed-data.org/school/San-Mateo/Burlingame-Elementary/Burlingame-Intermediate. Accessed: August 3, 2020.

c. California Department of Education. 2020. *Burlingame High*. Available: http://www.ed-data.org/school/San-Mateo/San-Mateo-Union-High/Burlingame-High. Accessed: August 3, 2020.

Parks

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

149 Ibid.

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

151 Burlingame School District. 2018. *Burlingame School District, District Boundaries*. Available: https://www.bsd.k12.ca.us/districtboundaries1617. Accessed: August 3, 2020.

152 Education Data Partnership. 2020. *Burlingame Elementary*. Available: http://www.ed-data.org/district/San-Mateo/Burlingame-Elementary. Accessed: August 3, 2020.

153 Burlingame High School. 2020. *Burlingame High School, Mission, Vision, and Values*. Available: https://www.smuhsd.org/domain/826. Accessed: August 3, 2020.

154 San Mateo Union High School District. 2020. *Welcome to the San Mateo Union High School District!* Available: https://www.smuhsd.org/domain/46. Accessed: August 3, 2020.

155 Burlingame School District. 2018. *Burlingame School District, District Boundaries*. Available: https://www.bsd.k12.ca.us/districtboundaries1617. Accessed: August 3, 2020.

Other Public Facilities

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

Previous CEQA Documents

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, found less-than-significant impacts related to public services. No mitigation measures or SCAs were warranted. Even with maximum buildout under the Specific Plan, new fire, police, school, or other public facilities would not be required to serve the area. The following General Plan goals and policies from the Community Safety Element, the Education and Enrichment Element, and the Healthy People and Healthy Places Element would help to reduce the less-than-significant impacts: Goal CS-1, Policy CS-1.1, Policy CS-1.2, Policy CS-1.3, Goal CS-2, Policy CS-2.1, Policy CS-2.3, Policy EE-1.3, Policy EE-1.4, Policy EE-1.10, Policy EE-1.13, Goal HP-4, Policy HP-4.1, Policy HP-4.4, Policy HP-4.6, and Policy HP-4.8.

Discussion

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

Fire Protection? (Less than Significant)

The Project would construct a new building with office and retail uses on the Project site, which is already developed and served by the CCFD. The Project would add approximately 542 new employees at the Project site and induce 115 individuals to move to the city. The Project would be required to comply with all applicable CCFD codes and regulations and meet CCFD standards related to fire hydrants (e.g., fire-flow requirements, hydrant spacing), the design of driveway turnaround areas, and access points, among other standards. In addition, the Project would be approximately 0.5 mile south of Fire Station No. 34. Because of the distance of the Project from the fire station, it is not expected that the Project would substantially affect response times.

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

Police Protection? (Less than Significant)

The Project site is currently served by the BPD. Neither the 2010 Specific Plan nor the 2040 General Plan Community Safety Element designate a standard ratio for police officers to residents or a standard emergency response time. However, the General Plan does require continued maintenance

of optimal police staffing levels to meet community safety needs.[156] The General Plan EIR referenced the "238 Bypass Fiscal Impact Analysis" metric, which established an optimum ratio of 1.5 sworn police officers per 1,000 residents.[157]

The Project would add approximately 542 employees at the site compared with existing conditions and induce 115 new residents to relocate to the city. The General Plan EIR, adopted in 2018, found that the BPD has not identified a need for new or expanded facilities to meet service needs.[158] In addition, the estimated service ratio of sworn officers to residents is currently 1.3 sworn officers to 1,000 residents.[159,160] The addition of 115 residents to the population would not substantially decrease this optimum service ratio.[161]

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

Schools? (Less than Significant)

As discussed in more detail in Section XIV, *Population and Housing*, the Project would induce up to 115 individuals to move to the city of Burlingame. The BSD uses a student generation rate of 0.2067 student per housing unit for elementary schools and a generation rate of 0.0525 for middle schools.[162] For high schools, the state high school student generation rate is 0.2 student per housing unit.[163] Using these student generation rates, 46 additional residences in the city could result in up to 10 elementary school students, three middle school students, and 10 high school students, which is not anticipated to result in a significant impact on the BSD or the SMUHSD.

The Project is subject to Senate Bill 50 school impact fees, as established by the Leroy F. Greene School Facilities Act of 1998. These fees support facility maintenance to offset potential impacts from additional use.[164] Section 65996 of the State Government Code notes that payment of the

156 City of Burlingame. 2019. *Envision Burlingame General Plan*. Available: https://www.burlingame.org/document_center/Planning/General%20and%20Specific%20Plans/BurlingameGP_Final_Nov2019_COMPLETE%20DOCUMENT.pdf. Accessed: August 3, 2020.

157 City of Burlingame. 2018. *Burlingame 2014 General Plan: Draft Environmental Impact Report.* Available: https://www.burlingame.org/document_center/Planning/BurlingameGP_DEIR_FullDocument_06-28-2018.pdf. Accessed: August 3, 2020.

158 Ibid.

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

160 1.3 sworn officers per 1,000 residents = (40 sworn officers/30,320 [population]) × 1,000 residents.

161 1.3 sworn officers per 1,000 residents = (40 sworn officers/30,320 [population]) + 115 (Project-induced population) × 1,000 residents.

162 SchoolWorks, Inc. 2016. *Level 1 – Developer Fee Justification Study for Burlingame School District*. Available: http://bsd-ca.schoolloop.com/file/1236520987086/1403330967436/5172072493375788958.pdf. Accessed: August 3, 2020.

163 State Allocation Board, Office of Public School Instruction. 2008. *Enrollment Certification/Projection*. Available: https://www.dgsapps.dgs.ca.gov/OPSC/ab1014/sab50-01instructions.pdf. Accessed: August 3, 2020.

164 State of California. 1998. *School Facilities Bond Act*. Available: http://www.leginfo.ca.gov/pub/97-98/bill/sen/sb_0001-0050/sb_50_cfa_19980715_154314_sen_floor.html. Accessed: August 3, 2020.

school impact fees established by Senate Bill 50, which may be required by any state or local agency, is deemed to constitute full and complete mitigation for school impacts from development. Therefore, the impacts, which were adequately addressed in the Previous CEQA Documents related to schools, would be ***less than significant***.

Parks? (Less than Significant)

The closest public parks to the Project site are Washington Park and Pershing Park, which are 0.15 mile northeast and 0.30 mile southwest of the Project site, respectively. As explained in more detail in Section XVI, *Recreation*, a significant increase in the use of public parks, recreational facilities, or other public facilities is not anticipated after Project buildout. Furthermore, substantial adverse physical impacts that would require the provision of new or physically altered park facilities after Project buildout would not occur. Because the Project would not trigger the need for new park facilities, the impacts would be ***less than significant***. This impact was adequately addressed in the Previous CEQA Documents.

Other Public Facilities? (Less than Significant)

The Project would induce 115 individuals to move to the city and add approximately 542 employees at the Project site. The Burlingame Main Public Library is closest to the Project site; however, it is expected that Project employees and Project-induced Burlingame residents would also use the Burlingame Public Library's Easton Branch Library as well as other libraries within the Peninsula Library System. The library system is expected to be able to accommodate the increase in the number of library users. Because the Project would not trigger the need for new library facilities, the impacts would be ***less than significant***. This impact was adequately addressed in the Previous CEQA Documents.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to public services than those identified previously. Implementation of existing rules and regulations governing public services, along with the City's General Plan goals and policies, would ensure that potential impacts would be less than significant. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The public services impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

XVI. Recreation

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☐	☒
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒

Setting

The City of Burlingame Parks and Recreation Department manages 18 recreational facilities citywide, including playgrounds, picnic areas, gardens, athletic facilities, walking trails, and more. Two of these parks are near the Project site. Washington Park and Pershing Park are 0.15 mile northeast and 0.30 mile southwest of the Project site, respectively. In addition, as mentioned in Chapter 2, *Project Description*, immediately west of the Project site is Lot E; the City is currently pursuing design and development of the lot as a town square/community open space (Town Square Project).

The 2010 Specific Plan and Chapter 25.33 of the City Municipal Code do not specifically provide open space requirements for HMU-zoned areas. However, the Specific Plan does acknowledge the importance of providing high-quality streetscapes and open spaces to expand and improve the downtown area. For example, the Specific Plan clearly identifies Lot E (adjacent to the Project site) as the preferred location for a signature downtown open space area; it also identifies a need for additional green open space in the downtown area with walkways and seating areas.[165]

Previous CEQA Documents

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, found less-than-significant impacts related to recreation. No mitigation measures or SCAs were warranted. Even with maximum buildout under the Specific Plan, new open space facilities would not be required to serve the area. The following General Plan goals and policies from the Healthy People and Healthy Places Element would help reduce the less-than-significant impacts: Goal HP-4, Policy HP-4.1, Policy HP-4.4, Policy HP-4.6, and Policy HP-4.8.

[165] City of Burlingame. 2010. *Burlingame Downtown Specific Plan.* Chapter 2: Goals and Policies. Available: https://www.burlingame.org/departments/planning/general_and_specific_plans.php. Accessed: August 5, 2020.

Discussion

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

As described in Section XIV, *Population and Housing,* the Project is expected to generate approximately 542 new employees. It is expected that some of these onsite employees would use park and recreational facilities near the Project site. However, in accordance with the Specific Plan, the Project would include outdoor space and streetscape improvements. The Project site would provide outdoor space along the adjacent Lot E to help activate a future plaza (Town Square Project). The proposed building would be set back from the underground culvert that runs along the western edge of the property, allowing that space to be dedicated to a new landscaped paseo. The proposed paseo would include pavers similar or complementary to those on Burlingame Avenue as well as plantings, stormwater treatment planters, and outdoor furniture for the future retail uses fronting this area. The paseo would become a new mid-block pedestrian connection, linking the proposed Town Square Project with Lorton Avenue and extending Burlingame Avenue's public realm toward the Town Square Project. Along the historic lobby of the Post Office building, the Project would include an elevated patio, providing opportunities for outdoor dining and engagement between the future Town Square Project and the Project site.

With the onsite open spaces, the future Town Square, and nearby Washington and Pershing Parks, the potential for park facility deterioration resulting from the increased population at the Project site would be reduced. Therefore, impacts, which were adequately addressed in the Previous CEQA Documents, would be ***less than significant***.

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

As mentioned above, the Project would provide onsite open space (e.g., a large lawn, a landscaped paseo that would connect to the Town Square Project, an elevated patio with outdoor dining space, streetscape improvements along Park Road and Lorton Avenue). The open space areas would serve as recreational areas for many current and future employees at the Project site. Construction of these new open spaces would not have an adverse physical impact on the environment. Furthermore, although the Project would add employees to the area, the Project would not trigger the need for construction or expansion of parks or other recreational facilities. Therefore, the Project would have a ***less-than-significant*** impact related to an adverse physical effect on the environment due to the construction or expansion of recreational facilities. This impact was adequately addressed in the Previous CEQA Documents.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to recreation than those identified previously. Implementation of existing rules and regulations governing recreation, along with the City's General Plan goals and policies, would ensure that potential impacts to recreational facilities would be less than significant. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The recreation impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

XVII. Transportation

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	☒
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☐	☒
c. Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d. Result in inadequate emergency access?	☐	☐	☐	☒

Setting

A transportation impact analysis (TIA) was prepared for the Project by Hexagon Transportation Consultants in July 2020 (see Appendix D).[166] The TIA describes existing and future conditions related to transportation with and without the Project. In addition, the TIA includes information on regional and local roadway networks, pedestrian and transit conditions, and transportation facilities associated with the Project.

Regional vehicular access to the Project site is provided via U.S. 101 and El Camino Real (State Route 82), while local access is provided by Broadway, Peninsula Avenue, California Drive, Howard Avenue, Burlingame Avenue, Park Road, and Lorton Avenue. Pedestrian facilities in the area consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections. In the vicinity of the Project site, sidewalks exist along both sides of Howard Avenue, Burlingame Avenue, Lorton Avenue, and Park Road, providing pedestrian access to and from the site. Marked crosswalks are provided along all stop-controlled approaches, except at the south leg of the Lorton Avenue/Bayswater Avenue intersection. The overall network of sidewalks and crosswalks has adequate connectivity, providing pedestrians with safe routes to transit services and points of interest in the vicinity of the Project site. Bicycle connections include the Class III bicycle routes along California Drive, Carolan Avenue, Primrose Road, and Highland Avenue as well as the Class II bicycle lanes north of the Project site along Carolan Avenue.

Existing transit service to downtown Burlingame is provided by SamTrans, the City, and Caltrain. Furthermore, the Project area is served by express bus routes. The nearest bus stops are at the intersection of Howard Avenue and California Drive and Howard Avenue and El Camino Real. The Howard Avenue and California Drive bus stop is approximately 785 feet from the Project site; the Howard Avenue and El Camino Real bus stop is 1,100 feet from the Project site.

[166] Hexagon Transportation Consultants, Inc. 2020. *220 Park Road Transportation Impact Analysis.* Prepared for ICF. July 14.

Caltrain provides passenger train service between San José and San Francisco 7 days a week. During commute hours, Caltrain provides extended service to Morgan Hill and Gilroy. The closest Caltrain station is the Burlingame station, approximately 700 feet northeast of the Project site. The Burlingame station provides local and limited Caltrain service both weekdays and weekends. Trains that stop at the Burlingame station operate with approximately 15- to 45-minute headways in both directions during commute hours, with somewhat less frequent service during midday hours. Service is provided between 5:30 a.m. and 11:35 p.m. in the northbound direction and between 5:20 a.m. and 12:35 a.m. (the next day) in the southbound direction.[167] As part of a modernization program, Caltrain rail service will be electrified. The electrified system will allow Caltrain to increase service. Furthermore, improved system operations will help Caltrain accommodate an increase in ridership. Because the Project site is within 700 feet of the Burlingame station, which is considered a "major transit stop," the Project site is within a TPA.

Previous CEQA Documents

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, found less-than-significant impacts related to transportation with implementation of governing rules, regulations, and mitigation measures. The Specific Plan is consistent with adopted policies regarding transit, bicycles, pedestrians, parking, and emergency response times. The Specific Plan would implement additional policies to enhance the use of transit and bicycles, improve conditions for pedestrians, and increase parking capacity. Although development under the Specific Plan would generate traffic volumes that would degrade intersection operations to unacceptable levels, mitigation measures/SCAs would reduce the impact from delays at affected intersections to a less-than-significant level. With implementation of Mitigation Measure F-1/SCA-11/SCA-12/SCA-31, Mitigation Measure F-2/SCA-32, and Mitigation Measure F-3/SCA-33, transportation and circulation impacts would be less-than-significant with mitigation.[168]

The General Plan EIR found that General Plan goals, policies, and implementation programs would limit most of transportation and circulation impacts to a less-than-significant level or result in no impact. The following goals and policies from the Mobility Element would reduce impacts related to transportation: Goal M-1, Policy M-1.1, Policy M-3.1, Goal M-4, Policy M-4.1, Goal M-5, Policy M-5.1, and Policy M-9.2. In most cases, no one goal, policy, or implementation measure is expected to completely avoid or reduce an identified potential environmental impact. However, the cumulative mitigating benefits of the policies listed above would result in a less-than-significant impact. In addition, with implementation of Mitigation Measure 18-1,[169] level-of-service intersection impacts at California Drive and Broadway would be less than significant with mitigation.

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

[168] SCA-31, SCA-32, and SCA-33 are measures to be implemented by the City rather than individual project applicants.

[169] Mitigation Measure 18-1 of the General Plan is to be implemented by the City in coordination with Caltrans.

Discussion

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

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

Construction

Heavy equipment would be transported on and off the Project site throughout demolition and construction of the Project. The transport of heavy equipment could cause slight traffic delays in the vicinity of the Project site during construction; however, the delays would be temporary. In addition, construction laydown and staging areas would be located on Lot E, which is adjacent to the Project site. This would limit the amount of construction traffic on surrounding streets. The impact regarding conflicts with applicable plans during construction would be ***less than significant.***

Operation

Based on trip generation rates recommended by the Institute of Transportation Engineers, it is estimated that the Project would generate 1,513 net new daily vehicle trips, with 154 net new trips during the AM peak hour and 175 net new trips during the PM peak hour. The City/County Association of Governments of San Mateo County CMP requires a level-of-service analysis for a freeway segment when the number of trips added by a project is expected to be greater than 1 percent of the segment's capacity. The number of new trips generated by the Project is expected to be considerably less than the 1 percent threshold for freeway segments. Therefore, a detailed freeway-segment analysis was not performed.

The CMP requires developments that are estimated to generate 100 or more new peak-hour trips to implement TDM measures (e.g., provide trip credits equal to or greater than a project's net peak-hour trip generation). Because the Project would generate more than 100 new peak-hour trips, TDM measures have been identified to reduce the number of peak-hour trips. As described in Chapter 2, *Project Description*, the goal of the Project Sponsor's TDM plan is to reduce single-occupancy vehicle VMT to and from the Project site by 20 percent compared with an equivalent project constructed elsewhere and with different design and programming incentives. Regular monitoring and reporting would ensure that tenants are in compliance with C/CAG standards for trip reductions. Therefore, the Project would be consistent with the CMP, and the impact associated with conflicts with the CMP would be ***less than significant***. This impact was adequately addressed in the Previous CEQA Documents.

The Specific Plan has a goal regarding the creation of links and connections, both to downtown and within downtown, to reduce the need for automobiles.[170] The Project would be approximately 0.1 mile from the Burlingame Caltrain station and near California Drive, which provides access to area bus routes. In addition, bus stops are located at the intersection of Howard Avenue and

[170] City of Burlingame. 2010. *Burlingame Downtown Specific Plan.* Chapter 2, Goals and Policies. Available: https://www.burlingame.org/departments/planning/general_and_specific_plans.php. Accessed: August 5, 2020.

California Drive and the intersection of Howard Avenue and El Camino Real. These intersections are approximately 785 and 1,100 feet from the Project site, respectively, and served by SamTrans, Caltrain, and the City. The Project, which would promote continued use of public transit facilities/services, would add approximately 16 new transit riders during peak hours. It is assumed that buses and transit services at the Burlingame Caltrain station would have adequate capacity and be able to accommodate this minor increase in ridership. The Project would not interfere with any existing bus route and would not remove or relocate any existing bus stops. Therefore, the Project's impact on transit services would be ***less than significant***, and the Project would be consistent with goals identified by the City. This impact was adequately addressed in the Previous CEQA Documents.

The Specific Plan has a goal of ensuring that streets in the downtown area are friendly to pedestrians and bicyclists.[171] Currently, there are bicycle facilities in the immediate vicinity of the Project site. The Project would maintain access to existing bicycle facilities, improve circulation throughout the Project site and surrounding neighborhoods, and provide short-term bicycle parking onsite. Although the Project could add additional bicycle trips, bicyclists would be able to use existing or planned facilities. Therefore, the Project's impact on bicycle facilities would be ***less than significant***, and the Project would be consistent with goals identified by the City. This impact was adequately addressed in the Previous CEQA Documents.

The Specific Plan has a goal of ensuring that Burlingame's streetscapes accommodate a variety of pedestrian experiences.[172] Pedestrian facilities in the study area consist of sidewalks, crosswalks, and signals at signalized intersections. The Project would include improvements to the frontages along Park Road and Lorton Avenue, such as additional sidewalk space, streetlights, and landscaping. The Project would also include outdoor seating areas that could be accessed by pedestrians. Overall, the Project would improve pedestrian facilities at the Project site. Therefore, the Project's impact on pedestrian facilities would be ***less than significant***, and the Project would be consistent with goals identified by the City. This impact was adequately addressed in the Previous CEQA Documents.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? (Less than Significant)

SB 743, which was codified in Public Resources Code Section 21099, resulted in changes to the CEQA Guidelines. Public Resources Code Section 21099 states that VMT is the appropriate metric for measuring transportation impacts. Public Resources Code Section 21099 also states that level of service, or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment. Therefore, this analysis focuses on potential impacts on VMT. Because Burlingame has not yet adopted any thresholds or guidelines related to VMT, evaluation of the Project's impact on VMT was based on the CEQA Guidelines published by Governor's Office of Planning and Research.

The Project site is approximately 0.1 mile from the Burlingame Caltrain station, which is considered a major transit stop. CEQA Guidelines Section 15064.3, subdivision (b)(1), notes that "generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less-than-significant transportation impact." Because the Project would be within 0.5 mile of an existing major transit stop, the Project would not

171 Ibid.

172 Ibid.

conflict with CEQA Guidelines Section 15064.3, subdivision (b). The Project would not result in a substantial effect on VMT. Therefore, the Project would result in a ***less-than-significant impact***. This impact was adequately addressed in the Previous CEQA Documents.

c. Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Less than Significant)

Project site access was evaluated in the TIA to determine the adequacy of the site's driveway with regard to the following: traffic volume, geometric design, sight distance, and operations (e.g., vehicle queuing and delay). Onsite vehicular circulation was reviewed in accordance with generally accepted traffic engineering standards and transportation planning principles. Vehicles access to the parking garage would be provided via a full-access driveway on Lorton Avenue. The driveway would provide access to a ground-floor parking garage, which would lead to the proposed below-grade parking garage.

The Lorton Avenue driveway would be 35 feet wide. The City Zoning Code (Section 25.70.025) requires a minimum of either two 12-foot driveways or one 18-foot driveway for parking areas with more than 30 vehicle spaces. Therefore, the proposed driveway meets the City's minimum-width requirement for two-way driveways. The Project driveway would provide enough stacking space for approximately five inbound vehicles and five outbound vehicles before encountering the first cross aisle. This is adequate stacking space for the expected driveway volume.

The driveway on Lorton Avenue would have a posted speed limit of 25 mph. The required Caltrans sight distance for stopping is 200 feet, based on a design speed of 30 mph. This means that a driver must be able to see 200 feet in both directions to find a gap in the traffic and pull out from the driveway.

A driveway to a commercial building adjacent to the Project site provides a clear sight zone south of the site. Street trees would be added along the Project site frontage on Lorton Avenue. The types and locations would be determined by the City at the implementation stage. Given that on-street parking is permitted along Lorton Avenue, 15 feet of painted red curb should be provided near the Project driveway to comply with Caltrans sight-distance requirements, thereby ensuring that exiting drivers can see northbound bicyclists and vehicles in the street. Appropriate warning signs and audible warning signals should be provided at the driveway to alert bicyclists and pedestrians to vehicles that may be exiting the garage. Regardless, the design features as proposed would not include hazardous designs.

The Project site would be clustered around a future public plaza on Park Road and Lorton Avenue that would extend through the Project site as a paseo to Lorton Avenue. The proposed retail areas would be adjacent to the new public plaza, which would provide outdoor space for seating areas, dining, community/cultural events, and landscaping. All street frontages would be improved to meet current requirements. The improvements would include wider sidewalks, street trees, and landscaping. The public plaza and paseo would connect all Project elements and provide a pedestrian connection between Park Road and Lorton Avenue. The site plan shows adequate pedestrian circulation throughout the Project site as well as between the site and surrounding pedestrian facilities. Pedestrian access to the Project would be facilitated by existing sidewalks on Lorton Avenue, Burlingame Avenue, Park Road, and Howard Avenue as well as the proposed paseo through the Project site between Lorton Avenue and Park Road. There are bus stops on El Camino Real and California Drive in the immediate vicinity of the Project site. Continuous walkways would be provided along the eastern and western edges of the Project site, including a pedestrian

connection through the site (i.e., the proposed public paseo). Existing bicycle facilities would provide adequate connectivity between the Project site and adjacent neighborhoods. Therefore, bicycle and pedestrian connections throughout the Project site would be safe and efficient.

The design features of the Project would not include hazardous designs or incompatible uses, and the impact would be ***less than significant***. This impact was adequately addressed in the Previous CEQA Documents.

d. Result in inadequate emergency access? (Less than Significant)

The Project would not change the existing roadway system. The Project site would be easily accessible via Lorton Avenue or Park Road should emergency vehicles be called to the site. Furthermore, smaller emergency vehicles would be able to access the parking garage. However, the proposed building would be adjacent to the property line on the east side of the site. Future redevelopment of existing parking area to create a plaza on the west side of the development may limit fire department access in this area. Therefore, a request for alternative means of fire department access is pending approval of the CCFD. No internal site circulation or emergency access issues have been identified that would result in a traffic safety problem or unusual traffic congestion or delay. Therefore, upon approval of the request, the Project would have a ***less-than-significant*** impact on emergency vehicle access, which was adequately addressed in previous documents.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to transportation than those identified previously. Implementation of existing rules and regulations governing transportation, including the City's General Plan goals and policies, would ensure that potential impacts associated with transportation would be less than significant. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The transportation-related impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

XVIII. Tribal Cultural Resources

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and:				
a. Listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☐	☒
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

Setting

The Project site is in the homeland of the Ohlone Native American tribe. The territory of the Ohlone people extended along the coast from the Golden Gate to the north to just below Carmel to the south and as far inland as 60 miles, encompassing several valleys. The Ohlone were hunter-gatherers who relied heavily on acorns as well as shellfish and sea fish. They also used a wide range of other foods, including various seeds, buckeye, berries, roots, land and sea mammals, waterfowl, reptiles, and insects. Prior to contact, the Ohlone were politically organized by tribelet, consisting of one or more villages or camps within a territory, as designated by physiographic features. Each tribelet had a chief whose duties included providing for visitors, overseeing ceremonial activities, and directing fishing, hunting, gathering, and warfare expeditions. The chief served as the leader of a council of elders that functioned primarily in an advisory capacity to the community.[173]

Seven Spanish missions were founded in Ohlone territory between 1776 and 1797. While living within the mission system, the Ohlone commingled with other groups, including the Esselen, Yokuts, Miwok, and Patwin. Mission life was devastating to the Ohlone population.[174] It has been estimated that the

[173] Levy, R. 1978. Costanoan. In *California*, R.F. Heizer, ed., pp. 485–495. Handbook of North American Indians. Volume 8. Washington, D.C.: Smithsonian Institution.

[174] Milliken, R. 1995. A Time of Little Choice: The Disintegration of the Tribal Culture in the San Francisco Bay Area, 1769–1810. In *Anthropological Papers 43*, series editor Thomas C. Blackburn. Novato, CA: Ballena Press.

Ohlone population numbered around 10,000 people in 1776 when the first mission was established in their territory. By 1832, the Ohlone population was less than 2,000 as a result of disease, harsh living conditions, and reduced birth rates.[175,176]

Tribal Consultation

Tribal cultural resources were originally identified as a distinct CEQA environmental category with the adoption of AB 52 in September 2014. For all projects that are subject to CEQA that received a notice of preparation, notice of negative declaration, or mitigated negative declaration on or after July 1, 2015, AB 52 requires the lead agency on a proposed project to consult with the geographically affiliated California Native American tribes. The legislation creates a broad new category of environmental resources (i.e., tribal cultural resources), which must be considered under CEQA. AB 52 requires a lead agency to not only consider the resource's scientific and historical value but also whether it is culturally important to a California Native American tribe.

AB 52 defines tribal cultural resources as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are included in or determined to be eligible for inclusion in the CRHR; included in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k); or determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria of Public Resources Code Section 5024.1(c) (CEQA Section 21074).

AB 52 also sets up an expanded consultation process. For projects initiated after July 1, 2015, lead agencies are required to provide notice of proposed projects to any tribe that is traditionally and culturally affiliated with the geographic area that requested to be informed by the lead agency, following Public Resources Code Section 21018.3.1(b). If, within 30 days, a tribe requests consultation, the consultation process must begin before the lead agency can release a draft environmental document. Consultation with the tribe may include discussion of the type of review necessary, the significance of tribal cultural resources, the significance of a project's impacts on the tribal cultural resources, and alternatives and mitigation measures recommended by the tribe. The consultation process will be deemed concluded when either (a) the parties agree to mitigation measures or (b) any party concludes, after a good-faith effort, that an agreement cannot be reached. Any mitigation measures agreed to by the tribe and lead agency must be recommended for inclusion in the environmental document. If a tribe does not request consultation, or otherwise assist in identifying mitigation measures during the consultation process, a lead agency may still consider mitigation measures if the agency determines that a project will cause a substantial adverse change to a tribal cultural resource.

The NAHC was contacted on July 23, 2020, and asked to conduct a search of its Sacred Lands File and provide a list of California Native American tribes that have a cultural affiliation with the geographic area of the Project site. The NAHC returned a negative finding regarding the search of its Sacred Lands File; however, on July 24, 2020, the NAHC provided a list of six tribal representatives. On August 6, 2020, an email was sent to all six individuals identified by the NAHC. Emails included a formal notification letter, pursuant to AB 52, that contained Project details, a location map, and a request for consultation. The following individuals were contacted:

[175] Cook, S.F. 1943. The Conflict between the California Indians and White Civilization, I: The Indian Versus the Spanish Mission. In *Ibero-Americana 21*. Berkeley, CA.

[176] Levy, R. 1978. Costanoan. In *California*, R.F. Heizer, ed., pp. 485–495. Handbook of North American Indians. Volume 8. Washington, D.C.: Smithsonian Institution.

- Monica Arellano, Vice Chairperson – Muwekma Ohlone Indian Tribe of the San Francisco Bay Area
- Tony Cerda, Chairperson – Costanoan Rumsen Carmel Tribe
- Andrew Galvan – Ohlone Indian Tribe
- Charlene Nijmeh, Chairperson – Muwekma Ohlone Indian Tribe of the San Francisco Bay Area
- Ann Marie Sayers, Chairperson – Indian Canyon Mutsun Band of Costanoan
- Irenne Zwierlein, Chairperson – Amah Mutsun Tribal Band of Mission San Juan Bautista

Follow-up phone calls were made to all six individuals listed above on September 21, 2020. Mr. Cerda, Ms. Nijmeh, and Mr. Galvan were unavailable. Voicemails were left with a brief description of the Project and a request for a call back from Mr. Cerda, Ms. Nijmeh, and Mr. Galvan. Ms. Arellano was also unavailable; however, no voicemail was left because of a full voicemail box.

Ms. Zwierlein stated that, although she had no concerns regarding construction of the Project, pre-construction cultural resources sensitivity training should be given to all crew members involved with ground disturbance. In addition, Ms. Sayers stated that she had no concerns regarding construction of the Project; she had no other comments.

As stated in Chapter V, *Cultural Resources,* although archaeological resources have not been previously recorded at the Project site or within 0.25 mile of the Project site, the potential remains for as-yet undocumented archaeological resources to be encountered during Project-related ground disturbance. Prehistoric archaeological resources can be considered tribal cultural resources.

Previous CEQA Documents

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, found less-than-significant impacts related to tribal resources with implementation of governing rules, regulations, and mitigation measures. Tribal consultation was conducted in 2008 for the Specific Plan IS/MND; the consultation concluded that implementation of the goals and policies in the Specific Plan, along with subsequent environmental review by project, would result in less-than-significant impacts on tribal resources. Included in the Specific Plan IS/MND are Mitigation Measure N-1/SCA-25 and Mitigation Measure N-2/SCA-27, which would reduce impacts on previously unidentified archaeological resources and human remains.

Tribal consultation was conducted for the General Plan EIR during the Notice of Preparation (NOP) process; no tribes responded to the NOP. The General Plan EIR concluded that no one goal, policy, or implementation measure would be expected to completely avoid or reduce an identified potential impact on tribal resources. However, implementation of existing regulations policies would reduce impacts to less than significant.

Discussion

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and:

a. Listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k)? (Less than Significant)

or

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (Less than Significant)

Although no known tribal cultural resources were identified during Native American consultation, the Sacred Lands File search, or the Northwest Information Center records search, the Project has the potential to encounter previously undocumented prehistoric archaeological resources. These resources have the potential to be considered tribal cultural resources. Therefore, the potential exists for as-yet undocumented tribal cultural resources (as defined in CEQA Section 21074.2) to be encountered during Project-related ground disturbance. Furthermore, buried deposits may be eligible for listing in the CRHR. However, implementation of SCA-25 and SCA-27 would ensure that impacts related to tribal cultural resources would be ***less than significant***. This impact was adequately addressed by the Previous CEQA Documents.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to tribal resources than those identified previously. Implementation of existing rules and regulations governing tribal resources would ensure that potential impacts would be less than significant. In addition, SCA-25 and SCA-27 would reduce impacts on undiscovered archaeological resources and human remains to less than significant. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The impacts on tribal resources were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

XIX. Utilities and Service Systems

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
Would the Project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒
c. Result in a determination by the wastewater treatment provider that serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Setting

Water

The City purchases all of its potable water from the San Francisco Public Utilities Commission (SFPUC) Regional Water System (RWS). Approximately 85 percent of the SFPUC RWS water supply originates in the Hetch Hetchy watershed in Yosemite National Park, then flows down the Tuolumne River to Hetch Hetchy Reservoir.[177] The remaining 15 percent of the SFPUC RWS water supply originates locally in the Alameda and Peninsula watersheds. This water is stored in six different reservoirs in Alameda and San Mateo Counties.[178] According to the City 2015 Urban Water Management Plan (UWMP), Burlingame's average water demand between 2011 and 2015 totaled 1,458 million gallons, which is equivalent to 3.99 million gallons per day (mgd),[179] or 76 percent of Burlingame's allotted 5.23 mgd. Generally, 41 percent of water

[177] Erler & Kalinowski, Inc. 2016. *2015 Urban Water Management Plan for the City of Burlingame*. Available: https://www.burlingame.org/document_center/Water/2015%20Urban%20Water%20Management%20Plan.pdf. Accessed: August 6, 2020.

[178] Ibid.

[179] Ibid.

consumption is from single-family residential uses, 17 percent from multi-family residential uses, 13 percent from industrial uses, 12 percent from commercial uses, 5 percent from irrigation uses, and 5 percent from institutional uses.[180]

There is an existing 12-inch water main in Lorton Avenue and an 8-inch main in Park Road.

Wastewater

The City's Public Works Department services Burlingame's wastewater system. There is an existing 6-inch sanitary sewer line in Lorton Avenue adjacent to the Project site. Wastewater flows are carried to a wastewater treatment plant (WWTP) at 1103 Airport Boulevard, which serves the entire city of Burlingame as well as approximately one-third of Hillsborough. The average dry-weather flow of wastewater to the WWTP has remained fairly constant, at approximately 3.0 to 3.5 mgd, which is approximately 55 to 64 percent of the facility's 5.5 mgd capacity.[181]

Stormwater

Under existing conditions, stormwater from the Project site is conveyed to stormwater drains and inlets and then to stormwater mains on Park Road or Lorton Avenue.[182] Stormwater from Burlingame's stormwater system drains into San Francisco Bay. Therefore, it is subject to the requirements of the Clean Water Act of 1972, which prohibits the discharge of stormwater into waters of the United States, unless the discharge is in compliance with a NPDES permit, as described in detail in Section X, *Hydrology and Water Quality*.

Solid Waste

Burlingame is within the service area of RethinkWaste, also known as the South Bayside Waste Management Authority. The City as well as the Towns of Atherton and Hillsborough; Cities of Belmont, East Palo Alto, Foster City, Menlo Park, Redwood City, San Carlos, and San Mateo; the County of San Mateo; and the West Bay Sanitary District form the Joint Powers Authority (JPA) for RethinkWaste. Recology San Mateo County provides recycling, composting, and garbage collection services for residents and businesses in the RethinkWaste service area. Recyclables and organic solid waste are taken by Recology trucks to the Shoreway Environmental Center in San Carlos for sorting. The Shoreway Environmental Center is owned by RethinkWaste and operated by South Bay Recycling on behalf of RethinkWaste. Solid waste and recyclables received at the Shoreway Environmental Center are processed and sent to the appropriate facility, including the Corinda Los Trancos Landfill (also known as Ox Mountain Landfill), which is in Half Moon Bay. This landfill has a maximum permitted capacity of 60,500,000 cubic yards. As of December 31, 2015, its remaining capacity was 22,180,000 cubic yards. The Corinda Los Trancos Landfill has an estimated closure date of 2034 and a permitted throughput capacity of 3,598 tons per day.[183]

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180 Ibid.

181 Ibid.

182 City of Burlingame. 2020. *Municipal Separate Storm Sewer System*. Available: http://bgmaps.maps.arcgis.com/apps/webappviewer/index.html?id=8f4f7accd3054ba5a4fde951fc45b601. Accessed: August 6, 2020.

183 California Department of Resources Recycling and Recovery. 2019. *Facility/Site Summary Details: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002).* Available: https://www2.calrecycle.ca.gov/SWFacilities/Directory/41-AA-0002/Detail. Accessed: August 6, 2020.

Electric Power, Natural Gas, and Telecommunications Facilities

PG&E's natural gas (methane) delivery system includes approximately 42,000 miles of distribution pipelines and 6,700 miles of transmission pipelines. Gas delivered by PG&E originates in gas fields in California, the Southwest, the Rocky Mountains, and Canada. Transportation pipelines send natural gas from fields and storage facilities in large pipes while under high pressure. The smaller distribution pipelines deliver gas to individual businesses or residences. PG&E gas transmission pipeline systems serve approximately 15 million customers in California. The system is operated under an inspection-and-monitoring program in real time on a 24-hour basis. The program provides leak inspections, surveys, and patrols of the pipelines.[184]

Numerous telecommunications providers serve Burlingame and provide access to infrastructure for broadband, fiber optic, wireless, and other emerging technologies. AT&T, Xfinity from Comcast, Wave Broadband, Sonic, and others provide telecommunication and cable television services to residents and businesses in the city. The Project site receives services from mainly AT&T and Xfinity from Comcast.[185]

Previous CEQA Documents

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, found less-than-significant impacts related to utilities with implementation of mitigation measures, SCAs, and/or General Plan goals and policies. The Specific Plan IS/MND determined that there would be potentially significant impacts on utilities and service systems due to inadequate wastewater, water, and stormwater infrastructure. However, with implementation of Mitigation Measure L-1/SCA-21 and SCA-22 and Mitigation Measure L-2/SCA-23 and SCA-24, impacts on utilities and service systems under the Specific Plan would be less than significant.

The General Plan EIR found less-than-significant impacts related to utilities and service systems. The following goals and policies from the Infrastructure Element were identified to reduce impacts on utilities: Goal IF-2, Policy IF-2.1, Policy IF-2.3, Policy IF-2.4, Policy IF-2.7, Policy IF-2.10, Goal IF-3, Policy IF-3.1, Policy IF-3.2, Policy IF-3.6, Goal IF-5, Policy IF-5.2, and Policy IF-5.8. No one established regulation, goal, policy, or implementation measure from the General Plan would be expected to completely reduce or avoid an identified potential utilities impact. However, the combined mitigating benefits of the required regulations and policies listed in the General Plan EIR would result in less-than-significant impacts on utilities and service system. No mitigation measures are warranted.

[184] Pacific Gas & Electric. 2020. *Learn about the PG&E Natural Gas System*. Available: https://www.pge.com/en_US/safety/how-the-system-works/natural-gas-system-overview/natural-gas-system-overview.page. Accessed: August 6, 2020.

[185] BroadbandNow. 2020. *Internet Service Providers in Burlingame, California.* Available: https://broadbandnow.com/California/Burlingame?zip=94010. Accessed: August 6, 2020.

Discussion

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (Less than Significant)

Water and Wastewater Facilities

The Project site is currently unoccupied; therefore, operation of the Project would increase the water use and wastewater generation compared with existing conditions. Because the Project would increase sewer flows, the Project Sponsor has coordinated improvements to the existing sanitary sewer infrastructure with the City Engineer, as required by SCA-21. Under the Project, approximately 200 linear feet of the sewer line in Lorton Avenue would be upgraded from a 6-inch vitrified clay pipe to an 8-inch high-density polyethylene pipe. Per SCA-22, the Project Sponsor would develop a plan to facilitate sanitary sewer improvements. Implementation of SCA-21 and SCA-22 would reduce impacts on the existing sanitary sewer system. Construction of the expanded wastewater infrastructure would not cause significant environmental effect.

As described in more detail in Items XIX(b) and (c), below, the increase in demand for water and as well as wastewater treatment, which would be minimal, could be served by the existing water supply and the remaining capacity at the WWTP. The Project would not require the relocation or construction of new or expanded water or wastewater treatment facilities because there is adequate water and wastewater treatment capacity available to serve the Project. Therefore, the impacts, which were adequately addressed in the Previous CEQA Documents, would be ***less than significant***.

Stormwater

As described in Section X, *Hydrology and Water Quality*, overall, the amount of stormwater that would be discharged with implementation of the Project would be slightly more than the amount that is currently discharged. However, the Project would include bio-retention flow-through planters and pervious areas to collect and reduce stormwater runoff. In addition, the Project would be required to adhere to the MRP. No new stormwater drainage facilities, other than those included in the Project design, would be required. Because new stormwater drainage facilities would be incorporated into the design of the Project, any impacts associated with new stormwater drainage facilities for the Project would be covered in Sections I through XX of this document. Therefore, impacts associated with new stormwater drainage facilities, which were adequately addressed in the Previous CEQA Documents, would be ***less than significant***.

Electric Power, Natural Gas, and Telecommunications Facilities

Operation of the Project is not anticipated to result in the construction or expansion of electric power, natural gas, or telecommunications facilities. Existing electric, gas, and telecommunications lines in the vicinity of the Project site would serve the Project. However, they may be upgraded, if necessary, to meet the needs of the Project.

The installation of new or expanded gas and/or telecommunications lines on the Project site would require excavation, trenching, soil movement, and other activities that are typical during the construction of development projects. These construction impacts are discussed in detail in

the appropriate topical sections of this document as part of the assessment of overall Project impacts. However, no offsite natural gas facilities or telecommunication lines would need to be installed or expanded as a result of the Project, resulting in less-than-significant impacts.

The Project would connect to existing electric and natural gas lines located around the perimeter of the Project site. No new electric power or natural gas lines would need to be installed. The Project site is served by both AT&T and Comcast for internet and other telecommunication services.[186] No new telecommunication lines would need to be installed. For the reasons outlined above, no offsite natural gas facilities would need to be constructed or expanded as a result of the Project, and telecommunication lines would not need to be installed, resulting in ***less-than-significant*** impacts. This impact was adequately addressed in the Previous CEQA Documents.

b. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years? (Less than Significant)

As explained above, the city uses an average of 3.99 mgd of its 5.23 mgd water supply. Burlingame's existing use represents 76 percent of its allotted supply; therefore, 24 percent of the city's water supply is unused. Under the Project, annual water demand is anticipated to total 1.6 million gallons; therefore, daily water demand would total approximately 4,384 gallons per day (gpd), or approximately 0.004 mgd. The additional water demand due to the Project represents an increase in daily water use in the city of approximately 0.1 percent. Burlingame's water supply can accommodate the minimal increase in water demand due to the Project. In addition, SCA-23 and SCA-24 would require coordination with the Fire Marshal, ensuring that the Project site would have an adequate water supply for fire suppression. Therefore, adequate water supplies would be available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. The impact would be ***less than significant***. This impact was adequately addressed in the Previous CEQA Documents.

c. Result in a determination by the wastewater treatment provider that serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments? (Impact Adequately Addressed in Previous Documents)

As described previously, the WWTP treats approximately 3.0 to 3.5 mgd of wastewater, which represents approximately 55 to 64 percent of the facility's 5.5 mgd capacity. Therefore, 36 to 45 percent of the WWTP's capacity remains available to treat wastewater. Wastewater quantities are generally approximately 90 percent of water-use quantities.[187] As discussed above, the Project's water demand would total approximately 4,384 gpd; therefore, the Project would generate approximately 3,946 gpd of wastewater, or 0.004 mgd. This additional wastewater demand due to the Project represents approximately 0.2 percent of the remaining wastewater treatment capacity (2.0 mgd) at the WWTP.[188] Currently, the remaining wastewater treatment capacity can accommodate the minimal increase in wastewater demand due to the Project. Therefore, the Project's impact, which was adequately addressed in the Previous CEQA Documents, would be ***less than significant***.

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186 AT&T. 2010. *2010 Statewide Telephone Boundary Map: Telephone Exchange Areas of California*. Available: https://www.cpuc.ca.gov/boundarymaps/. Accessed: September 4, 2020.

187 San Francisco Public Utilities Commission. 2018. *Wastewater Service Charge Appeal*. Available: https://sfwater.org/index.aspx?page=132. Accessed: August 6, 2020.

188 0.2 percent = (0.004 mgd Project wastewater/2.0 mgd remaining capacity) × 100 percent.

d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? (Less than Significant)

The California Integrated Waste Management Act of 1989 (AB 939) requires municipalities to adopt an integrated waste management plan to establish objectives, policies, and programs related to waste disposal, management, source reduction, and recycling. In addition, SB 1383, passed in 2016, established a target that calls for a 50 percent reduction in organic waste by 2020 and a 75 percent reduction by 2025. As discussed above, the City is part of a regional JPA that manages solid waste collection and recycling services for several cities. The JPA is required to divert waste from landfills to achieve state reduction goals. In 2018, San Mateo County as a whole had a total diversion rate of 50.8 percent because of recycling and composting. Burlingame had a slightly lower diversion rate than the county, with 40.3 percent of waste diverted from landfills.[189]

Construction of the Project would result in demolition waste from the removal of parking lot pavement and trees. The Project would be required to comply with the City Construction and Demolition Recycling Ordinance (Chapter 8.17 of the City Municipal Code), which requires salvaging or recycling at least 60 percent of construction-related solid waste. In addition, operation of the Project would most likely increase overall solid waste generation because of the additional office and retail uses compared with existing conditions on the site (i.e., no existing uses). However, operation of the proposed facility would be required to meet state and local standards regarding solid waste and recycling. The increase in the amount of solid waste generated would be considered negligible because the landfills that would be used would continue to have ample capacity and, therefore, would be able to handle the minimal increase.

It is anticipated that the Project could generate approximately 15,000 pounds per day (7.50 tons per day) of solid waste in the form of garbage as well as recycling and composting material. Although trash receptacles would be provided in the parking structure, this use is not expected to generate a significant amount of waste. The Shoreway Environmental Center is permitted to receive 3,000 tons of refuse per day.[190] Once collected and sorted at the Shoreway Environmental Center, solid waste is transported to Corinda Los Trancos Landfill, which is permitted to receive 3,598 tons per day.[191] Solid waste generated by operation of the Project would represent approximately 0.25 percent and 0.21 percent of the permitted capacity of the Shoreway Environmental Center and Corinda Los Trancos Landfill, respectively. As such, the Shoreway Environmental Center and the Corinda Los Trancos Landfill would have adequate capacity to serve the Project.

The Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair attainment of solid waste reduction goals. Therefore, impacts from solid waste disposal, which were adequately addressed in the Previous CEQA Documents, would be ***less than significant.***

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189 Recology San Mateo County. 2019. *Annual Report to the SBWMA for Year 2018*. Available: https://rethinkwaste.org/wp-content/uploads/legacy_media/recology-annual-report-2018.original.pdf. Accessed: August 6, 2020.

190 RethinkWaste. 2020. *About Shoreway.* Available: https://rethinkwaste.org/shoreway-environmental-center/about/. Accessed: August 6, 2020.

191 California Department of Resources Recycling and Recovery. 2020. *Facility/Site Summary Details: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002).* Available: https://www2.calrecycle.ca.gov/SWFacilities/Directory/41-AA-0002/Detail. Accessed: August 6, 2020.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (Less than Significant)

The Project would develop retail and office uses, which would not result in the generation of unique types of solid waste that would conflict with existing regulations regarding waste disposal. The Project would be required to comply with the City's solid waste disposal requirements, including recycling programs established under AB 939. As a result, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, and the impact would be less than significant.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to utilities and service systems than those identified previously. Implementation of existing rules and regulations governing utilities, including Specific Plan SCA-21, SCA-22, SCA-23, and SCA-24, along with the City's General Plan goals and policies, would ensure that potential impacts would be less than significant. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The impacts on utilities and service systems as a result of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

XX. Wildfire

	Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the Project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Because of slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risks or result in temporary or ongoing impacts on the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Setting

The Project site is not located in a Moderate, High, or Very High Fire Hazard Severity Zone (FHSZ) within a State Responsibility Area. The closest State Responsibility Area to the Project site is a Moderate FHSZ, approximately 1.5 from the site and west of Interstate 280.[192] The Project site and all surrounding areas are within a Local Responsibility Area, which is not identified as a Moderate, High, or Very High FHSZ.

Previous CEQA Documents

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, found no impacts related to wildfires. No mitigation measures were warranted.

[192] California Department of Forestry and Fire Protection. 2007. *Fire and Resource Assessment Program Fire Hazard Severity Zones in SRA*. San Mateo County. Available: https://osfm.fire.ca.gov/media/6802/fhszs_map41.pdf. Accessed: September 28, 2020.

Discussion

a. Substantially impair an adopted emergency response plan or emergency evacuation plan? (Less than Significant)

The Project would construct a new structure on previously developed commercial land. Access points to the site would be provided to ensure proper ingress for emergency vehicles. Although the City does not have an established evacuation plan, the Project would adhere to the guidelines established by the Community Safety Element of the 2040 General Plan. Therefore, the Project would not conflict with an adopted emergency response or evacuation plan. The impact would be ***less than significant*** and was adequately addressed in the Previous CEQA Documents.

b. Because of slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?)

The Project site is in an area that is highly developed and lacking the features that normally elevate wildland fire risks (e.g., dry vegetation, steeply sloped hillsides). Because the Project site is not within or near a State Responsibility Area or a Very High FHSZ, there would be ***no impact***.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risks or result in temporary or ongoing impacts on the environment? (No Impact)

The Project would not require the installation or maintenance of associated infrastructure that would exacerbate fire risks, resulting in ***no impact***.

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? (No Impact)

The Project site does not include an area that is downslope or downstream from areas that could experience post-fire slope instability or drainage changes. Therefore, the Project would result in ***no impact*** regarding the exposure of people or structures to associated significant risks.

Conclusion

The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The wildfire impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

XXI. Mandatory Findings of Significance

		Significant Impact Peculiar to the Project or Project Site	Significant Impact Not Identified	Significant Impact Due to Substantial New Information	Impact Adequately Addressed in Previous Documents
a.	Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	☒
b.	Does the Project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☐	☒
c.	Does the Project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

Previous CEQA Documents

The Previous CEQA Documents, including the Specific Plan IS/MND and the General Plan EIR, considered degradation of the quality of the environment, adverse effects on human beings, and cumulative impacts throughout the respective documents. Any impacts were mitigated in the IS/MND and EIR under their respective topics.

Discussion

a. Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory? (Less than Significant)

As described in Section IV, *Biological Resources*, the Project site is in an urban area and surrounded by development. Other than the trees located on the Project site, there are no natural features that support habitat. The removal of trees would not degrade the quality of the environment because

these trees are not naturally occurring; they were planted for landscaping purposes. Although nesting birds could use the trees as well as the building that would be removed from the Project site, there are trees elsewhere in the city. Therefore, the Project would not reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

As described in Section V, *Cultural Resources*, construction of the Project would not eliminate important examples of major periods of California history or prehistory. Implementation of existing rules and regulations governing cultural resources, along with implementation of the City's General Plan goals and policies, would ensure that potential impacts would be less than significant. Although the Project would remove character-defining features from the Lorton Avenue façade of the historic Post Office building, the Page & Turnbull analysis (Appendix C) determined that the Project would fully comply with nine of the Secretary's Standards (Standards 1 through 9) and substantially comply with the remaining standard, Standard 10, as outlined in the covenant. In addition, SCA-25 and SCA-27 would reduce impacts on undiscovered archaeological resources and human remains to less than significant.

The Project would not substantially degrade the quality of the environment, substantially reduce wildlife habitat, or eliminate important examples of the major periods of California history or prehistory. These impacts, which were adequately addressed in the Previous CEQA Documents, would be ***less than significant***.

b. Does the Project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) (Less than Significant with Mitigation)

The cumulative impact analyses determined whether the Project in combination with other approved or foreseeable projects would result in a significant cumulative impact and, if so, whether the Project's contribution to the significant cumulative impact would be cumulatively considerable.

The General Plan EIR evaluated future development, as identified in the 2040 General Plan. Chapter 22 of the General Plan EIR concluded that implementation of the 2040 General Plan would result in a less-than-significant impact with respect to cumulative impacts on the following resources: aesthetics; agricultural resources; air quality; biological resources; geology, soils, and minerals; hazards and hazardous materials; historic and cultural resources; hydrology and water quality; land use and planning; noise; population and housing; public services; and utilities. Given the conclusions in the General Plan EIR; given that the Project, with mitigation, would have a less-than-significant impact on the aforementioned resources; and given that future projects would be required to adhere to federal and state regulations, as well as local regulations identified in the 2040 General Plan, the Project's contribution to impacts on the aforementioned resources would not be singularly or cumulatively considerable.

Chapter 10 of the General Plan EIR includes the cumulative impact analysis of GHG emissions. The General Plan EIR concluded that implementation of the 2040 General Plan could result in a significant cumulative GHG impact because the City cannot conclusively demonstrate that implementation of the 2040 General Plan would not generate GHG emissions that would exceed the City's existing and future GHG reduction goals. The Project's contribution to global climate change due to GHG emissions is discussed in Section VIII, *Greenhouse Gas Emissions*. Development of the

Project would incorporate applicable policies of the BAAQMD and comply with the City's Climate Action Plan. As discussed in Section VIII, *Greenhouse Gas Emissions*, the Project would be consistent with the state's GHG emissions reduction trajectory and the City's Climate Action Plan. Therefore, the Project's contribution to this cumulative impact would not be cumulatively considerable.

Chapter 18 of the General Plan EIR includes the cumulative transportation impact analysis. The General Plan EIR concluded that implementation of local regulations and 2040 General Plan policies would ensure that cumulative transportation impacts would be less than significant.[193] As discussed in Section XVII, *Transportation,* the Project would result in a less-than-significant impact with respect to VMT, design hazards, and emergency access. In addition, operation of the Project would result in a less-than-significant impact regarding conflicts with applicable plans. Given the Project's less-than-significant impacts with mitigation and given that future projects would be required to adhere to local regulations and 2040 General Plan policies, the Project's contribution to cumulative transportation impacts would not be singularly or cumulatively considerable. Therefore, cumulative impacts would be ***less than significant with mitigation.*** This impact was adequately addressed in the Previous CEQA Documents.

c. Does the Project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? (Less than Significant with Mitigation)

As described in this document, implementation of the Project could result in temporary air quality, GHG, hazardous materials, and noise and vibration impacts during the construction period. Implementation of the mitigation measures recommended in this document would ensure that the Project would not result in environmental effects that would have substantial adverse effects on human beings. Impacts would be ***less than significant with mitigation***. This impact was adequately addressed in the Previous CEQA Documents.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the Previous CEQA Documents, implementation of the Project would not result in any new or more severe significant impacts related to degradation of the quality of the environment, adverse effects on human beings, or cumulative impacts than those identified previously. Implementation of existing rules and regulations governing biological resources, cultural resources, and other environmental topics, including the City's General Plan goals and policies, would ensure that potential impacts would be less than significant. In addition, implementation of Project-specific mitigation measures, as included throughout this document, would further reduce impacts. The Project would not result in a significant impact peculiar to the Project, a significant impact not previously identified, or a significant impact due to substantial new information. The cumulative impacts of the Project were adequately addressed in the Previous CEQA Documents, and no further analysis is required.

[193] The General Plan EIR included a conclusion for level-of-service impacts. The level-of-service conclusion is not considered here because CEQA does not consider impacts on level of service to be an environmental effect.