567 Airport Boulevard Project

Initial Study/Mitigated Negative Declaration

Response to Comments

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Chapter 1
Introduction

Overview

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

The City of Burlingame (City) prepared a draft initial study/mitigated negative declaration (IS/MND) for the Project and found that it would not have a significant effect on the environment. The City Planning Division provided a 30-day public comment period, which began on June 28 and ended on July 29, 2021, for the Project's IS/MND. The key reason for circulating an IS/MND is to collect comments on the accuracy of the information, detect omissions, and discover public concerns (CEQA Guidelines Section 15073).

This document lists individuals who provided comments on the IS/MND, includes copies of the written comments received, and provides responses to the comments. As required by the California Environmental Quality Act (CEQA), responses are provided to address comments received during the public review period (Public Resources Code Section 21091[d]; CEQA Guidelines Section 15073). Responses to the comments are provided before adoption of the IS/MND is considered (Public Resources Code Section 21092.5[b]). Where the text of the IS/MND has been revised in response to a comment or concern, the revised text is included as part of the response, with revisions shown using the following conventions: <u>text added</u> to the IS/MND is shown in underline, and ~~text deleted~~ from the IS/MND is shown in strikethrough.

This document also includes the revised Traffic Impact Analysis (TIA) as Attachment A to this document.[1]

[1] TJKM. 2021. *Traffic Impact Analysis Report: Burlingame Bay Office Building at 567 Airport Blvd.* September 24.

Comment Letters Received by the City

The City received three comment letters during the public comment period. The City acknowledges the receipt of the comment letters and has provided responses below. Each comment letter was individually addressed by the City Planning Division. This document includes responses to public comments on the IS/MND related to the potential environmental impacts of the Project under CEQA. A list of the comment letters is provided below.

1. California Department of Transportation, dated July 28, 2021
2. City of San Mateo, dated July 29, 2021
3. Law Offices of Charles S. Bronitsky, dated July 29, 2021

Chapter 2
Response to Comments

Comment Letter 1. California Department of Transportation

Response 1-1

The commenter states that the vehicle-miles-traveled (VMT) analysis is in keeping with the Office of Planning and Research's Technical Advisory recommendations and consistent with California Department of Transportation (Caltrans) procedures.

Comment is noted. The IS/MND for the Project included an analysis of VMT in Section XVII, Transportation (pages 3-107 through 3-112). In addition, a TIA was prepared for the Project by TJKM and included as Appendix E to the IS/MND. The TIA has since been revised (September 24, 2021). The revised TIA is included as Attachment A to this document.

Response 1-2

The commenter notes that Caltrans supports the proposed Transportation Demand Management (TDM) measures. The comment also suggests additional improvements to pedestrian facilities, such as adding a crosswalk at the Airport Boulevard/Bay View Place intersection and/or a new crosswalk and warning devices at the northern access point.

The commenter's support for the proposed TDM measures is noted and appreciated. Regarding the additional pedestrian improvements, the City will consider them. However, the City notes that the currently proposed TDM measures are adequate for the Project.

Response 1-3

The commenter requests that Project-related travel demand be identified and the costs of transit and active transportation associated with the Project be estimated. The commenter further notes that Caltrans encourages fair-share contributions toward transit improvements to mitigate cumulative impacts on regional transportation.

The comment is noted. The TIA for the Project (Appendix E to the IS/MND) analyzes Project-related travel demand; it is not a fair-share analysis of regional impacts. In this case, the Project TDM plan requires, in effect, the new shuttle buses to mitigate the entirety of transit impacts caused by the Project.

Response 1-4

The commenter notes that Burlingame, as the lead agency, should fully address impacts on State Transportation Network facilities as well as fair-share financing and implementation responsibilities for proposed mitigation.

The comment is noted. As stated on page 58 of the TIA (Appendix E to the IS/MND), the Project would not result in any direct impacts on State Transportation Network facilities.

Response 1-5

If Caltrans facilities are affected by the Project, the commenter notes that the replacement facilities must meet Americans with Disabilities Act standards and full bicycle and pedestrian access must be maintained during construction.

The comment is noted. The Project would not affect Caltrans facilities directly or lead to the need for construction on the aforementioned facilities.

Comment Letter 2: City of San Mateo

Response 2-1

The commenter provides an overview of concerns regarding the traffic analysis performed for the Project (e.g., the traffic analysis does not adequately address Project impacts on San Mateo roadways and does not accurately portray VMT impacts).

The overview comment is noted; subsequent comments and responses below address related matters.

Response 2-2

The commenter states that the Project could induce housing demand outside Burlingame and that such inducement should be acknowledged as a Project impact and mitigated accordingly.

Please refer to IS/MND Section XIV, *Population and Housing* (pages 3-96 through 3-99). Within that section, the analysis considers whether the Project could "induce substantial unplanned growth," consistent with the CEQA Checklist found in Appendix G of the CEQA Guidelines.

The analysis in the IS/MND acknowledges the Project's potential to induce growth and the formation of new households. Based on the Project's size, the potential exists for the Project to generate up to 620 new households, assuming that all new employment opportunities associated with the Project would be filled by people who are not currently living in the area. The analysis notes that the percentage of employees who both work and reside in Burlingame is approximately 12 percent. The analysis also notes that Burlingame entitled 818 new residential units in 2020 and approximately 180 more new units are in various stages of development. Because of the amount of new growth potential relative to already-approved (or in pipeline) growth, the IS/MND concludes that the Project would not substantially induce unplanned growth and no mitigation is needed.

Response 2-3

The commenter asserts that the TIA should have included additional intersections in San Mateo to assess congestion-related effects. The commenter further asserts that, without review of such intersections, the environmental analysis is deficient.

Please refer to IS/MND Section XVII, *Transportation* (pages 3-107 through 3-112). Within this section, the analysis considers the transportation-related questions in the CEQA Checklist found in Appendix G of the CEQA Guidelines. The CEQA checklist requires consideration of whether a project would conflict with a transportation-related policy or plan, substantially increase VMT, increase design hazards, or interfere with emergency access. The intersection delay analysis suggested by the commenter is no longer required within a CEQA analysis. The TIA (Appendix E to the IS/MND) included nine Burlingame intersections and three San Mateo intersections to evaluate whether the Project would be consistent with relevant agency policies concerning intersection operations. CEQA no longer considers intersection delay to be a significant environmental impact.

Response 2-4

The commenter indicates that the Third Avenue/Norfolk Street intersection should have been considered.

Please refer to Response 2-3. This intersection is an important element of the existing congestion in the North Shoreview neighborhood. Previous studies commissioned by the City of San Mateo recommended that southbound-to-eastbound left turns should be prohibited during the peak hour to minimize the attractiveness of North Shoreview as a short cut to San Mateo Bridge. The City of San Mateo has not prohibited this movement because of potential impacts on other parts of the city. The Project would add 12 PM Peak-Hour trips (page 54 of TIA) at the north entrance to North Shoreview. Some trips may involve residents or other people who have reason to visit the area. As previously stated, CEQA does not consider the effects of intersection delay to be significant effects on the environment; notwithstanding, the potential Project impacts on Third Avenue/Norfolk Street would be very minor.

Response 2-5

The IS/MND does not discuss high collision locations.

High collision locations in areas with very high congestion are considered to be of secondary importance when evaluating peak-hour impacts because the number of collisions on local streets during congested periods and the severity are reduced. However, a follow-up review of collision history, using Transportation Injury Mapping System (TIMS) collision heat maps, indicates no substantial local collision issues at study area intersections.

Response 2-6

The commenter indicates that queuing issues involving private chartered buses were not considered and a two-bus loading area may be insufficient.

The commenter appears to be referring to onsite bus loading areas. It is expected that two loading spaces will be sufficient because passengers (and buses) will arrive with staggered schedules. If more space is needed, a nearby space is available on the property where buses could queue without causing hazards or delays elsewhere. This would not affect Project access points or public streets.

Response 2-7

The commenter indicates that the traffic study should be a better reflection of the Burlingame Bicycle/Pedestrian Master Plan.

Comment noted. The report reflects baseline conditions at the time the environmental review commenced, as provided in CEQA Guidelines Section 15125. A new Bicycle/Pedestrian Master Plan was adopted during preparation of the TIA. The new plan did not introduce new policies with which the Project would conflict. Although the report could be expanded to reflect the plan, this would not change the report's findings or conclusions.

Response 2-8

The commenter indicates that employment-related VMT as the basis for significance findings is inconsistent within the report.

Please refer to response 2-20.

Response 2-9

The commenter questions why traffic volumes were "balanced" and not used directly.

The report was prepared during the COVID-19 lockdown, when traffic volumes were not normal. Therefore, the report relied on pre-COVID counts from other sources made at different times. Balancing, or adjusting, intersection counts not made the same day was necessary to achieve reasonable and consistent data. It was not possible to conduct effective balancing at the two Project driveways because no previous counts were available for the locations, and the COVID-19 shutdown precluded new counts. However, all other study locations had recent pre-COVID counts available. Balancing was conducted primarily along Broadway, an area where several closely spaced study intersections are located.

Response 2-10

The commenter requests that intersection lane geometries be added to the report.

Lane geometries are found in the Synchro calculation sheets in Appendices B, C, and D through H. However, for the convenience of the reader, a new figure has been added to the TIA (September 24, 2021) on page 21 (Figure 3d). Please refer to Attachment A of this document for the new figure.

Response 2-11

The commenter requests information on where and why signal timings were optimized under existing conditions.

All intersection signal timing was optimized under existing conditions because of the lack of availability of current signal timing.

Response 2-12

The commenter indicates that San Mateo has optimized signal timing at an unidentified intersection and questions if that factor was considered in the analysis.

The commenter may be referring to the intersection of North Bayshore Boulevard and Peninsula Avenue. That location has a very short westbound left-turn lane that continuously overflows during the peak hour, which was taken into consideration during preparation of the TIA and analysis of the intersection under each study scenario.

Response 2-13

The commenter reports inconsistencies in Synchro analyses at three intersections and 200 vehicles missing from a movement.

The comment is not specific enough to determine where the reported inconsistencies are located. Therefore, it is not possible to respond to the comment.

Response 2-14

The commenter indicates that traffic rerouting in the morning sends northbound traffic to Anza Boulevard instead of the Airport Boulevard interchange, which is three times longer. The comment asserts that this is not plausible and therefore presents inaccurate impacts.

This distance is not three times longer. It is longer, but the travel time is similar because the route avoids the congested Airport Boulevard off-ramp. It is likely that Anza Boulevard will be an attractive route for many motorists.

Response 2-15

The commenter indicates that a greater proportion of the trips should be assigned to southbound travel on US 101. This is inconsistent with existing origin/destination data.

Reassignment of traffic to different routes and intersections affects primarily level-of-service (LOS) analyses. However, CEQA analysis no longer requires an LOS analysis to be included.

The commenter did not indicate the source of the existing origin/destination data. However, TJKM checked to see what the results would be with a greater proportion of the traffic sent to the south. After shifting the traffic to have a more equalized north–south distribution, none of the three San Mateo interchanges had a substantial change in delay or LOS.

Response 2-16

The commenter questions the rationale for having 5 percent of the afternoon motorists travel north to the Broadway southbound on-ramp (i.e., out of the way) to travel south on US 101.

Reassignment of traffic to different routes and intersections affects primarily LOS analyses. However, CEQA analysis no longer requires an LOS analysis to be included.

There are just two ways for motorists to reach southbound US 101, either from the Broadway southbound ramps or the Poplar Avenue southbound ramps. Use of the Poplar Avenue ramps requires travel through many congested intersections in San Mateo. Use of the Broadway ramps avoids the congested San Mateo intersections and may result in a reduced travel time, even with additional travel on US 101.

Response 2-17

The commenter notes an active effort by the City of San Mateo to reduce afternoon cut-through traffic in the North Shoreview neighborhood, which was not represented in the traffic study. No westbound-to-southbound left turns onto North Bayshore Boulevard should be assumed.

Please refer to Section 9.4 of the TIA, which provides extensive detail concerning the North Shoreview neighborhood, including its history, potential future solutions related to US 101 corridor improvements, and the very small increase in traffic caused by the Project. As also noted in the TIA, of the 12 trips assigned to North Bayshore Boulevard in the afternoon period, some may be Project residents returning to their North Shoreview homes. In addition, some may be patrons of the hotel in the neighborhood. The report also acknowledges the substantial overflow at the left-turn lane on Peninsula Avenue but points out that most of the North Bayshore Boulevard traffic comes from the west side of the freeway, not the Burlingame Bayfront area.

Response 2-18

The commenter notes that the report does not indicate if the queue at Airport Boulevard/Coyote Point Drive/Peninsula Avenue will extend to the upstream intersection.

Please refer to Table 7 of the TIA (pages 29 and 30), which indicates that the northbound queue at the subject intersection is currently calculated to extend 400 feet in the AM Peak Hour. With Project traffic added, this would increase to 430 feet, or about two additional car lengths. The upstream intersection, at Peninsula Avenue and North Bayshore Boulevard, is less than 300 feet away; therefore, the calculated queue would continue to extend past the upstream intersection.

Response 2-19

The commenter indicates that the adjustment to the peak-hour factor (PHF) is not well explained and defined.

When calculating intersection LOS, adjustments, such as PHF changes, are sometimes appropriate, as was the case in one scenario. However, a CEQA analysis no longer requires LOS analysis to be included.

The PHF increases as intersection volumes increase. In Table 9 on page 35 of the TIA, intersections 7 and 9 have had PHF adjustments applied, resulting in acceptable conditions without mitigation measures. The language in the table and text has been revised in the TIA, dated September 24, 2021 (Attachment A to this document), to reflect more accurate descriptions. This does not change the results or conclusions of the analysis.

Response 2-20

The commenter indicates the countywide VMT per employee described in the report is higher than reported by other agencies.

The VMT discussion has been revised from a countywide rate of 29.50 per employee to reflect an actual countywide rate of 16.74 per employee, very close to the rate reported by other agencies. The required TDM plan would reduce this to 12.45, which would be more than 15 percent below the countywide average, thereby continuing to result in a less-than-significant impact. The earlier countywide rate was based on an incorrect interpretation of tables within the recently updated countywide model.

Section 4.3 of the TIA has been revised to reflect an updated analysis, beginning on page 31. The revised section is included here.

4.3 VEHICLE MILES TRAVELED

Compliance with Senate Bill (SB) 743 included replacement of LOS with VMT for purposes of assessing traffic impacts under CEQA described in new Section 15064.3 of the CEQA Guidelines that applied statewide beginning on July 1, 2020. Lead agencies have discretion to choose the most appropriate methodology to evaluate a project's vehicles miles traveled, including whether to express the change in absolute terms, per capita, per household or any other measure. Most jurisdictions, including the City of Burlingame, do not yet have an adopted VMT threshold. For the purposes of this study, the screening guidelines and significance thresholds recommended in the OPR *Technical Advisory* are utilized, as discussed in Section 2.1.

<u>As noted above, the OPR advisory recommends a significance threshold for office projects of 15 percent below existing regional VMT per employee.</u> For office projects, OPR <u>also</u> recommends home-based work (commute) VMT per employee as the appropriate metric for evaluating impacts. TJKM used the C/CAG-VTA travel demand model to determine the existing commute VMT per employee at the Project location and countywide~~, based on the 2015 baseline model year~~. ~~To be considered a low VMT area, the existing VMT at a project location should be below the OPR recommended significance threshold. For an employment use, the recommended threshold is 15 percent below the existing regional commute VMT per employee. The existing commute~~

~~VMT per employee at the project location (TAZ #1949) is 17.92, compared to a countywide average of 29.50 and a corresponding threshold of 25.07. The project would meet the suggested screening criteria for low-VMT areas, and it would be consistent with the existing land uses within this TAZ, which include other large office buildings. The project is expected to have a **less-than-significant impact** to VMT and would be exempt from further VMT analysis~~. TJKM also took into account the effect of the proposed TDM plan required under the City's 2030 Climate Action Plan. Under City requirements, the TDM program would need to reduce peak-hour trips by at least 20 percent, via strategies that encourage mode shifting and thus also reduce VMT.

Because the Project would construct a new office building in a location containing primarily other office buildings, the Project would normally be expected to generate the same average-commute VMT per employee of 17.92 as existing uses in the Project location. As discussed below, with the measures included in the required TDM plan, daily-commute VMT per employee for the Project is expected to be 12.45.

With a countywide average-commute VMT per employee of 16.74, the significance threshold of 15 percent below that average would be 14.23. Because the Project would construct a new office building in a location containing primarily other office buildings, the Project would normally be expected to generate the same average-commute VMT per employee. In order to fall below the significance threshold, the Project's VMT per employee would need to be reduced by at least 20.6 percent. As discussed below, the required TDM plan is expected to reduce the Project's VMT generation by approximately 30.5 percent. With this program in place, the Project is expected to generate 12.45 VMT per employee. Based on the OPR-recommended significance threshold, the Project would have a ***less-than-significant*** impact on VMT.

In summary, the key metrics for this VMT analysis are:

- Countywide average: 16.74 VMT per employee
    - Significance threshold: 14.23 (85 percent of countywide average)
- TAZ #1949, existing: 17.92 VMT per employee
- Required VMT reduction to avoid impact: 20.6 percent
- VMT reduction from TDM plan: 30.5 percent
- Project VMT with TDM plan: **12.45 VMT per worker**

VMT outputs from the C/CAG-VTA travel demand model are attached in Appendix D.

Effects of Required TDM Program on Project VMT

Based on research summarized by Fehr & Peers in 2019 (included in Appendix E), a robust TDM program has the potential to substantially reduce employee VMT. The Project Sponsor has prepared a TDM plan, which focuses on mode shifting commute trips from single-occupancy vehicles to alternate modes, including transit, carpools, and biking, or walking. The proposed TDM plan, dated November 6, 2020, is included in Appendix F. The proposed plan was prepared in accordance with strategies and guidance provided in the C/CAG *Guidelines for Implementing the Land Use Component of the Congestion*

Management Program. Table 8 provides a summary of specific VMT reduction measures that are included in the proposed TDM plan, with their corresponding estimated reductions. It should be noted that the C/CAG Guidelines provide generous estimates of trip credits for a variety of TDM measures and that the City requires that peak-hour trips be reduced by at least 20 percent via a TDM plan. The proposed plan would provide credits in excess of the entire peak-hour trip generation, with all credits due to mode shifting.

The proposed TDM program would include measures such as providing subsidized transit passes; facilitating ride sharing; providing information on local transportation facilities and services; providing onsite amenities for bicycle commuters, including showers and changing areas; and recommending telecommuting and alternative work schedules. In particular, the TDM plan requires a TDM coordinator, a minimum level of transit subsidy, provision of a shuttle to Caltrain/BART, and ongoing monitoring via employee surveys about travel behavior. As discussed in Section 3.4, there is currently a free shuttle that connects the Millbrae BART/Caltrain station with Airport Boulevard, with the nearest stop located at Bay View Place. The City of Burlingame also operates a free shuttle to the Broadway Caltrain station, with the nearest stop at the Hilton Hotel across the street from the Project site. These shuttles provide crucial last-mile connectivity and make it more likely that employees would utilize transit-related benefits such as free or discounted transit passes for Caltrain and/or BART. Although these shuttle stops exist already, the Project TAZ does not include these as transit connections, and the travel demand model predicts only 3 percent transit use among employees. As such, the actual VMT reduction for the Project due to these shuttle stops is assumed to be moderate. As of 2021, it appears that a large proportion of office workers intend to work from home full or part time indefinitely and so the relative VMT reduction for telecommuting and alternative work schedules is assumed to be high. Estimated reductions for other measures, within the range provided by Fehr & Peers, were conservative and generally based on the trip credit assumptions outlined in the C/CAG guidelines.

As shown in Table 8, relatively conservative VMT reduction estimates, based on the proposed TDM plan, would result in a total reduction of 30.5 percent. This would reduce the Project's VMT generation to 12.45 VMT per worker, below the applicable significance threshold of 14.23.

Table 8: VMT Reductions and Proposed TDM Measures

CAPCOA Strategies[a]			VMT Reductions				
Category	**#**	**Strategy**	**F&P Range[b]**	**Min.**	**Max.**	**Project Estimate[c]**	**Comments**
Land Use/Location	3.1.5	LUT-5: Increase Transit Accessibility	0%–5.8%	0%	5.8%	3%	Existing stops for two free shuttle routes within ½ mile. Not accounted for in existing TAZ data.
Commute Trip Reduction	3.4.3	TRT-3: Provide Ride-Sharing Programs	2.5%–8.3%	2.5%	8.3%	3%	
	3.4.4	TRT-4: Implement Subsidized or Discounted Transit Program	0%–16%	0%	16%	8%	Tenants required to provide minimum transit subsidy of $20/month for 25% of employees.
	3.4.6	TRT-6: Encourage Telecommuting and Alt. Work Schedules	0.2%–4.5%	0.2%	4.5%	4.5%	TDM plan lists as optional. Recommend this be required.
	3.4.7	TRT-7: Implement CTR Marketing	0.9%–26%	0.6%	26%	8%	Marketing organized by required TDM coordinator. TDM plan lists as optional. Recommend this be required.
	3.4.11	TRT-11: Employer-Sponsored Vanpool/Shuttle	1.4%–6.8%	1.4%	6.8%	4%	Required under TDM plan.
Total				**5%**	**67.4%**	**30.5%**	

Notes:

[a] *Quantifying Greenhouse Gas Mitigation Measures*, California Air Pollution Control Officers Association (CAPCOA), August 2010.

[b] *SB 743 Implementation TDM Strategy Assessment*, Fehr & Peers, February 2019.

[c] Based on trip credit guidelines in C/CAG *Guidelines for Implementing the Land Use Component of the Congestion Management Program*, C/CAG, 2000.

This scenario is similar to Existing Conditions, but with the addition of traffic from approved and other reasonably foreseeable developments within the vicinity of the Project that would use the roadway network under review for this Project. The projects included in Background Conditions were selected in consultation with City of Burlingame staff. Approved and other reasonably foreseeable developments located within the immediate vicinity of the Project and relevant to this analysis are:

- 1 & 45 Adrian Court residential development
- 1095 Rollins Road Apartments
- SFO Technology Center, 1300 Bayshore Hwy
- 1499 Bayshore Hwy Hotel
- Burlingame Point Office Park, 300 Airport Blvd
- Burlingame Topgolf, 250 E. Anza Blvd
- 1008–1028 Carolan Ave & 1007–1025 Rollins Rd Multi-Family Development

Figure 7 shows projected turning movement volumes at all the study intersections for Background No-Project Conditions for AM and PM Peak Hours. The turning movement counts under Background No-Project Conditions are a combinations of Background counts and Existing Conditions – No Project Counts. The Background conditions were developed using available turning movement counts from each project's Traffic Impact Analysis. The trips were distributed throughout the network based on that available information from the Traffic Impact Analysis reports.

In addition, the analysis in Section XVII. Transportation, Impact b., page 3-111, has been revised as follows.

For office projects, the Office of Planning and Research Technical Advisory recommends that lead agencies analyze the home-based commute VMT per employee that would be generated at a project site. The advisory provides several recommended screening criteria lead agencies may consider in determining whether detailed VMT analysis is required. When such analysis is required, projects that are similar to existing nearby uses can be evaluated, based on existing VMT at the Project location. Existing VMT may be determined through use of a travel demand model. The C/CAG of San Mateo County licenses the countywide travel demand model for San Mateo County from the Santa Clara County Valley Transportation Authority (VTA). The C/CAG-VTA model is optimized for use in Santa Clara and San Mateo Counties. In addition, the analysis also took into account the effect of the proposed TDM plan required under the City's 2030 Climate Action Plan. Under City requirements, the TDM program would need to reduce peak-hour trips by at least 20 percent, via strategies that encourage mode shifting and thus also reduce VMT.

In the Project vicinity, the C/CAG-VTA travel demand model generated a daily commute VMT per employee of 17.92 for the baseline model year of 2015. As discussed below, with the measures included in the required TDM plan, daily-commute VMT per employee for the Project is expected to be 12.45. With a countywide average-commute VMT per employee of 16.74, the significance threshold of 15 percent below that average would be 14.23. Because the Project would construct a new office building in a location containing primarily other office buildings, the Project would normally be expected to generate the

same average-commute VMT per employee. In order to fall below the significance threshold, the Project's VMT per employee would need to be reduced by at least 20.6 percent. As discussed below, the required TDM plan is expected to reduce the Project's VMT generation by approximately 30.5 percent. With this program in place, the Project is expected to generate 12.45 VMT per employee. Based on the OPR-recommended significance threshold, the Project would have a ***less-than-significant*** impact under CEQA. ~~This is more than 15 percent below the countywide average of 29.50 and a corresponding threshold of 25.07. Based on the recommended screening criteria used for this study, this is considered a low-VMT area. The Project would be consistent with existing land uses, which include other large office buildings. The Project would therefore be expected to result in a less-than-significant impact under CEQA.~~ It is exempt from further VMT analysis.

Response 2-21

The commenter indicates that mitigation for northbound ramp queuing at the US 101/Airport Boulevard ramps is not presented.

Neither LOS nor queuing are CEQA evaluation metrics. It should be noted that an additional 300 feet of ramp storage is available in advance of the ramp's turning lanes, providing a safe overflow storage space. No backup to the freeway is expected.

Response 2-22

The commenter indicates that mitigation for northbound ramp queuing at the US 101/Airport Boulevard off-ramp and the intersection of Airport Boulevard/Coyote Point Drive/Peninsula Avenue is not presented.

Neither LOS nor queuing are CEQA evaluation metrics. It should be noted that an additional 300 feet of ramp storage is available in advance of the ramp's turning lanes, providing a safe overflow storage space. No backup to the freeway is expected. There may be no feasible solution to the intersection queuing at Coyote Point Drive; however, as stated, neither LOS nor queuing are CEQA evaluation metrics. No further evaluation is needed for CEQA purposes.

Response 2-23

The commenter requests correcting the title of Section 9.4 to "North Shoreview Neighborhood Analysis."

The title of this section within the TIA has been corrected; the correction does not affect any of the TIA's conclusions. The updated TIA is included as Attachment A to this document.

Response 2-24

The commenter notes that 14 (not) 28 of its neighborhood action plans have been approved.

Comment noted. The text of the TIA has been corrected; the correction does not affect any of the TIA's conclusions. The updated TIA is included as Attachment A to this document.

Comment Letter 3: Charles S. Bronitsky

Response 3-1

The commenter asserts that there are only two access points to US 101 for the Project, Airport Boulevard and Broadway. No analysis has been made to account for the possibility of a blockage on Broadway, leaving Airport Boulevard as the sole access point.

Customary practice is to ensure the availability of more than a single access point for most developments, usually to account for an emergency condition blocking one of the access points. The hypothetical scenario presented by the commenter describes such a situation. However, contrary to the assertion of the commenter, four locations are available for access to US 101: the Peninsula Avenue overpass, the Airport Boulevard northbound ramps, the Anza Avenue northbound ramps, and Broadway. Therefore, a blockage on the Broadway overpass and ramps in Burlingame would still leave three access points to US 101 in an emergency situation.

Response 3-2

The commenter indicates that resources for traffic-volume information are not provided or the information, if provided, may not be an accurate portrayal of conditions, thereby affecting related impact conclusions.

All resources used in the study are based on traffic reports approved by the City and available on the City website. The report used in this study was the November 2019 *Burlingame Top Golf Transportation Impact Analysis Report* prepared by Fehr & Peers. The traffic counts are contained in the appendix to the report.

Response 3-3

The commenter notes that about 10 percent of the Project traffic occurs in each peak hour, but no information is provided to support the conclusion that 80 percent of the Project traffic occurs during non-peak hours.

The daily and peak-hour trip rates for this Project are based on data from the Institute of Transportation Engineers (ITE) *Trip Generation*, 10th edition. This is a national publication and the standard reference for trip generation studies, including those in the San Francisco Bay Area. Virtually every public agency and professional group relies on ITE data, which are continually updated, based on actual traffic studies, and considered very reliable. The actual peak-hour percentages used for the Project are 11.9 in the AM Peak Hour and 11.8 in the PM Peak Hour, as calculated from Table 5 on page 23 of the TIA.

Response 3-4

The commenter notes that existing buildings at the complex have been partially vacant for some time. The full impact of traffic associated with the buildings, once they are fully occupied, has not been accounted for. Also, inadequate parking is proposed.

As stated in the report, the partial vacancies noted by the commenter were accounted for in the traffic studies. ITE-based trip generation volumes for vacant square footage were added into existing traffic volumes. Therefore, traffic associated with the existing buildings that will remain onsite is fully accounted for in the study.

A total of 1,519 parking stalls would be provided for the existing and proposed buildings at the site, thereby meeting City requirements. This number reflects the 20 percent reduction in traffic volumes described in the required TDM plan for the Project. Please refer to the discussion of parking in Section 9.3 of the TIA (page 50).

Response 3-5

The commenter indicates that the specifics of the TDM plan are not set out. In the commenter's judgment, the effects of the TDM plan are overstated and generally unenforced.

Details regarding the TDM plan are provided in the report itself, a part of the application for the Project, and detailed further in the VMT section of the report. The current TDM plan's monitoring procedures are very stringent. The process requires an annual survey of all employees, preparation of an annual compliance report, and an annual meeting with City staff members to discuss the submitted report and the ability of the City to assess a monetary fine for non-compliance.

Response 3-6

The commenter asserts that the IS/MND addressed emergency access and evacuation impacts in an insufficient manner.

As noted in the IS/MND for the Project, two entrance driveways and interior circulation roadways, between 26 and 29 feet in width, would provide adequate space for emergency vehicles to access the site and maneuver as needed. Therefore, although the Project would add additional vehicles to Airport Boulevard, their presence would not physically interfere with one's ability to evacuate in the event of an emergency.

The IS/MND notes that the City does not have an established evacuation plan. However, the Project would adhere to the guidelines established by the Community Safety Element of the Burlingame General Plan. The Community Safety Element establishes goals and policies that have been designed to protect public health and safety, provide for sound emergency preparedness planning, and build resiliency. The Community Safety Element addresses emergency preparedness, disaster response, and resilience.

Goal CS-3, as well as supporting polices CS-3.1 and CS-3.9, is designed to prepare residents and businesses for disasters and ensure that the City, and other government agencies, is ready to respond to protect lives and property in the event of an emergency and build a more resilient community.

- **Goal CS-3 –** Protect Burlingame residents, property, and businesses by ensuring preparedness for, and effective response to, natural and human-caused disasters.
- **Policy CS-3.1 – Emergency Management Plan.** Maintain a Comprehensive Emergency Management Plan that outlines the City's responsibilities and procedures in an emergency. Ensure the plan integrates needed coordination between the City and neighborhood groups, schools, churches, businesses, and hotels.
- **Policy CS-3.9 – Mass Communications Device.** Obtain, maintain, and regularly upgrade a mass communications system to effectively notify people during disasters and emergencies by using current communication technologies.

Lastly, the Central County Fire Department (CCFD) has been working with the Zonehaven Evacuation Planning Management Platform, which provides communities with critical evacuation updates and resources. CCFD also runs campaigns to encourage the public to subscribe to SMCAlert, the emergency mass notification system.

Response 3-7

The commenter states that the IS/MND should address other impacts of the Project, including impacts associated with a potential long-term drought.

Please refer to IS/MND Section XIX, *Utilities and Service Systems*. Within that section, please refer to the discussion for Impact XIX(b) (page 3-120), which specifically addresses water supply issues, including scenarios involving single and multiple dry years. This section has been updated to reflect adoption of the 2020 Urban Water Management Plan (UWMP).

The following text and footnotes on pages 3-116 and 3-117 have been updated:

Water

The City purchases all of its potable water from the San Francisco Public Utilities Commission (SFPUC) Regional Water System (RWS). Approximately 85 percent of the SFPUC RWS water supply originates in the Hetch Hetchy watershed in Yosemite National Park, then flows down the Tuolumne River to Hetch Hetchy Reservoir.[144] The remaining 15 percent of the SFPUC RWS water supply originates locally in the San Antonio, Calaveras, Crystal Springs, Pilarcitos. and San Andreas Reservoirs~~Alameda and Peninsula watersheds. This water is stored in six different reservoirs in Alameda and San Mateo Counties.~~[145] According to the City's ~~2015~~ 2020 Urban Water Management Plan (UWMP), Burlingame's average water demand in 2016 was at a 10-year low because of the drought and the resulting mandatory water restrictions; between 2013 and 2016, the City experienced a 28.5 percent reduction in water demand.[145] Since 2016, water use rebounded to 106 gallons per capita per day (GPCD), or 1,249 million gallons (3.42 million gallons per day [mgd]) but has not returned to pre-drought levels (136 GPCD or 1,482 million gallons [4.06 mgd])~~between 2011 and 2015 totaled 1,458 million gallons, which is equivalent to 3.99 million gallons per day (mgd),[146] or 76 percent of Burlingame's allotted 5.23 mgd~~.[147] Current water demand is approximately 65 percent of Burlingame's allocated 1,909 million gallons (5.23 mgd).[147] Generally, 40~~1~~ percent of water consumption is from single-family residential uses, 18~~7~~ percent from multi-family residential uses, 13 percent from industrial uses, 14~~2~~ percent from commercial uses, 5 percent from irrigation uses, and 3~~5~~ percent from institutional uses.[147, 148]

[144] City of Burlingame~~Erler & Kalinowski, Inc~~. 2021~~2016~~. *~~2020~~2015 Urban Water Management Plan for the City of Burlingame*. Available: file:///C:/Users/37848/Downloads/Draft%202020%20UWMP%20and%20WSCP.pdf~~https://www.burlingame.org/document_center/Water/2015%20Urban%20Water%20Management%20Plan.pdf~~. Accessed: September 23~~January 27~~, 2021.

[145] Ibid.

[146] Ibid.

[147] Ibid.

[148] Ibid. ~~The City adopted its UWMP in June 2016. Pursuant to the Urban Water Management Planning Act (California Water Code Section 10610 et seq.), UWMPs are normally updated every 5 years, typically in years ending in a 5 or a 0. However, in 2015, state law extended the deadline by a year. Accordingly, the City's June 2016 UWMP is up for review in 2021. As of the date of this document, the City has not yet drafted or adopted a 2021 update to its UWMP. The City's 2015 UWMP provides the most reasonable basis for use in this analysis.~~

The following text and footnotes on page 3-129 have been updated:

> According to the 2020~~2015~~ UWMP, the City uses an average of ~~3.99 mgd of its 5.23 mgd~~ 1,249 million gallons (3.42 mgd) of its 1,909-million-gallon (5.23 mgd) water supply. Burlingame's existing use represents ~~76~~ 65 percent of its allotted supply; therefore, ~~24~~ 35 percent of the City's water allotment is unused.[158] The Project site is estimated to currently use approximately 27,272 gallons per day (gpd) (0.027 mgd) of potable water.[159] The Project is estimated to demand approximately 25,200 gpd (0.025 mgd) of potable water, resulting in a total water demand of 52,472 gpd (0.052 mgd) for the entire Project site.[160a] The additional water demand due to the Project represents an increase in daily water use in the city of approximately 0.~~6~~7 percent.
>
> As discussed in detail in the 2020 UWMP, the City is expected to have adequate water supplies during normal years and be able to meet its projected demands through 2045.[160b] However, the reliability of the SFPUC RWS supply is anticipated to vary greatly in the future. Numerous uncertainties remain in the dry-year water supply projections because of the following factors:
>
> - Implementation of the Bay-Delta Plan Amendment is under negotiation.
> - The benefits of the Alternative Water Supply Program are not accounted for in current supply projections.
> - The methodology for Tier One and Tier Two wholesale drought allocations has not been established for wholesale shortages greater than 20 percent.
> - RWS demands are subject to change.
> - The frequency and duration of cutbacks are uncertain.[160c]
>
> The City has placed a high priority on working with the Bay Area Water Supply and Conservation Agency (BAWSCA) and SFPUC in the upcoming years to refine the estimates regarding RWS reliability. In addition, the City may amend the 2020 UWMP when new information becomes available. The above uncertainties notwithstanding, BAWSCA's current drought-related allocation cutbacks will require the City to apply its Water Shortage Contingency Plan's water use restrictions, which will affect Burlingame's short- and long-term water management decisions. In addition, the City, SFPUC, and BAWSCA have developed strategies to address projected dry-year water supply shortfalls. These include implementation of water supply projects, alternative water supply programs, and demand management measures. Furthermore, if conditions for large drought-related cutbacks to the RWS persist, the City will implement additional demand management practices, invoke strict restrictions on potable water use, and accelerate efforts to develop alternate supplies of water.[160d]
>
> Given the strategies and actions to address projected dry-year water supply shortfalls, and the Project's minimal increase in water demand, it is anticipated that Burlingame's water supply can accommodate the minimal increase in water demand due to the Project. In addition, Burlingame General Plan Policies CS-2.3 and CS-2.4 would require coordination with the fire marshal, thereby 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***.

158 City of Burlingame. 2021. *2020 Urban Water Management Plan for the City of Burlingame.* Available: file:///C:/Users/37848/Downloads/Draft%202020%20UWMP%20and%20WSCP.pdf. Accessed: September 23, 2021. ~~As of June 2021, the City has not yet updated its UWMP. Because the City obtains its water from the SFPUC, the City is, in turn, dependent on the SFPUC's UWMP. SFPUC issued a draft UWMP in April 2021. SFPUC's draft UWMP identified several potential future water supply scenarios. Scenarios that involve full adoption of the Bay-Delta Plan indicate substantial long-term water deficits. Such deficits could reasonably be inferred to mean that SFPUC will not be able to provide its customers, including the City, with their full annual water allocations. However, SFPUC's draft UWMP also includes scenarios that indicate adequate future water supplies. SFPUC is expected to adopt a final UWMP in July 2021, at which point the City will have a more adequate basis upon which to update its own UWMP. Although it is acknowledged that SFPUC's draft UWMP indicates potential long-term water supply deficits that may inhibit its ability to provide its customers with typical allocations, as of the publication date of this document, there remains insufficient certainty regarding SFPUC's yet-to-be-finalized UWMP. Accordingly, the analysis and conclusions regarding water in this initial study rely upon the City's adopted 2015 UWMP. The analysis and conclusions in this document do not convey any water rights to the involved property. In the event that the City updates its UWMP, based on a final SFPUC UWMP, indicating an inability to provide the typical water allocation over the long term, the City may enact/enforce water restrictions, up to and including moratoria on new water connections.~~

159 BKF. 2020. *Burlingame Bay – Sanitary Sewer Demand Memorandum*. April 3.

160a Ibid.

160b City of Burlingame. 2021. *2020 Urban Water Management Plan for the City of Burlingame.* Available: file:///C:/Users/37848/Downloads/Draft%202020%20UWMP%20and%20WSCP.pdf. Accessed: September 23, 2021.

160c Ibid.

160d Ibid.

Response 3-8

The commenter states that the IS/MND should address other impacts of the Project, including impacts related to the jobs/housing ratio.

Please refer to Response 2-2.

COMMENT LETTERS

California Department of Transportation

DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS–10D | OAKLAND, CA 94623-0660
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July 28, 2021

SCH #: 2021060610
GTS #: 04-SM-2021-0367
GTS ID: 23447
Co/Rt/Pm: SM/101/15.452

Robert Hurin, Planning Manager
City of Burlingame
501 Primrose Road
Burlingame, CA 94010

Re: 567 Airport Boulevard Project Mitigated Negative Declaration (MND)

Dear Robert Hurin:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 567 Airport Boulevard Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the June 2020 MND.

Project Understanding
The project proposes to develop 12.8 acres of land in the Bayfront area of Burlingame. The site is currently developed with an office park. The project would include construction of a new eight-story, 241,679 sf office/research-and-development (R&D) building and a 5.5-level parking structure on the site of an existing surface parking lot.

Travel Demand Analysis
With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide (*link*). 1-1

Caltrans acknowledges the VMT analysis in keeping with the Office of Planning and Research's Technical Advisory recommendations, as well as the findings that the project will produce VMT above the local threshold but is located in a low-VMT area.

Mitigation Strategies

Location efficiency factors, including community design and regional accessibility, influence a project's impact on the environment. Using Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the proposed project site is identified as a Close-In Compact Community where community design is fair and regional accessibility is strong.

Caltrans supports the proposed TDM measures, as well as the trip reduction goal of 20% in accordance with the City of Burlingame's Climate Action Plan. Using a combination of strategies appropriate to the project and the site can reduce VMT, along with related impacts on the environment and State facilities. We also support the presence of a TDM coordinator to document annual monitoring reports to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take to achieve those targets. 1-2

Because of the high demand for transit use, and consequently first-mile-last-mile connections that this project is expected to generate, we support improved pedestrian and bicycle facilities in the area. To support mode shift and the onsite connection access to the Bay Trail, the project should evaluate adding an additional crosswalk at the Airport Blvd/Bay View Pl intersection and/or a new marked crosswalk and Rectangular Rapid Flashing Beacon adjacent to the projects northern ingress/egress point.

Transportation Impact Fees

Please identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the proposed project. We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT. 1-3

Lead Agency

As the Lead Agency, the City of Burlingame is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. 1-4

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These 1-5

access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users. 1-5 (cont.)

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Laurel Sears at laurel.sears@dot.ca.gov. Additionally, for future notifications and requests for review of new projects, please email LDIGR-D4@dot.ca.gov.

Sincerely,

Mark Leong

MARK LEONG
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

CITY OF SAN MATEO
PUBLIC WORKS DEPARTMENT
Azalea Mitch, P.E., Director

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July 29, 2021

Ruben Hurin, Planning Manager
City of Burlingame Community Development Department
Planning Division
501 Primrose Road
Burlingame, CA 94010-3997

Re: City of San Mateo Comment Letter for the 567 Airport Boulevard Office/Research Development CEQA Environmental Review – Notice of Intent to Adopt a Mitigated Negative Declaration

Dear Mr. Hurin,

The City of San Mateo has prepared this letter to provide comments on the Draft Notice of Intent to Adopt a Mitigated Negative Declaration for the 567 Airport Boulevard Office/Research Development. The City is concerned that the traffic analysis performed for this development does not adequately capture impacts that may be realized on the City of San Mateo roadways. Further, the City has concerns that the VMT analysis performed utilized a countywide VMT per employee value that does not align (and is nearly double) with values other agencies in the county are using for this analysis, such that the finding of a less-than-significant impact is incorrect. Attached to this letter is the City's full list of comments (2 pages). 2-1

Sincerely,

Jay Yu, P.E.
Engineering Manager

Enclosures

C: Chron/File

Document Location	City Comment on Initial Study/Mitigated Negative Declaration (IS/MND)	
Initial Study/Mitigated Negative Declaration		
General Comments	The project could result in approximately 880 office employees which equates to approximately 620 households based on Burlingame's 1.42 average number of workers per worker household. Burlingame entitled 818 net new DUs in 2020 with additional 180 DUs in the pipeline. The IS is saying that housing demand is addressed with these entitled/pipeline projects; however, not all employees at Facebook can affordable to live in Burlingame. The project may be inducing housing demand outside Burlingame with these new jobs, so how is this project helping to bridge the jobs-housing balance and how is it contributing toward the production of affordable housing? The IS/MND does not provide mitigations for the impacts as a result of this project.	2-2
Appendix E: Traffic Impact Analysis		
General Comments	Four intersections located west of US-101 in Burlingame were studied (4, 5, 6, and 7); similar intersections in San Mateo should be studied as well, including Peninsula/Humboldt and Peninsula/Delaware considering the split of traffic utilizing Peninsula Avenue. Queue lengths at these intersections should also be included in the analysis. The IS/MND did not consider all appropriate intersections and therefore does not accurately reflect the impacts of the project.	2-3
General Comments	Considering traffic congestion identified and discussed in the North Shoreview neighborhood, if the project proposes assigning trips to route through that neighborhood, they should also include the 3rd/Norfolk as a study intersection to evaluate the impact of the additional cut-through traffic they are assigning there.	2-4
General Comments	The IS/MND does not show how did the project team evaluate intersections with high collision locations.	2-5
General Comments	Considering the amount of private charted buses either currently running or planned in this area, the study should include discussion and analysis about whether the two-bus loading/unloading spaces provided are sufficient to meet the demand and any queuing issues that may result. The IS/MND does not include this analysis and therefore their queuing impacts are inconclusive.	2-6
General Comments	The City of Burlingame has finalized their Bicycle/Pedestrian Master Plan. The discussion and analysis should be updated to reflect both existing and proposed facilities in the project area.	2-7
Page 10	Employment VMT basis for findings of significance value is different than other employment VMT values discussed in the document that establish the basis for significance findings. The IS/MND is inconsistent.	2-8
Page 17	It is unclear in the IS/MND why traffic volumes were not used directly and how "balancing" was accomplished. The IS/MND is unclear on its methodology and thus cannot fully and accurately represent the impacts.	2-9
Page 17	Intersection lane geometries not found in document. Provide graphic as indicated.	2-10
Page 21	Provide information about where and why signal timings were optimized in the existing conditions analysis.	2-11
Page 21	The City of San Mateo has optimized signal timing at this intersection to curtail westbound left-turn cut-through traffic. The IS/MND does not demonstrate whether that was considered. Without that information, the IS/MND does not accurately depict the impacts as a result of the project.	2-12

Page 22	The traffic count provided in the EIR is inconsistent with traffic volumes used in Synchro analysis for US-101 northbound/Airport Dr, Airport Dr/Coyote Point/Peninsula Ave, and Peninsula Ave/N. Bayshore Blvd intersections. In at least one instance, over 200 vehicles for a movement in one direction was not included in the analysis. The IS/MND is inconsistent with already established data and therefore does not accurate depict the impacts.	2-13
Page 24	The nearest ramps near the project location are not full interchanges, trip distribution should be assessed differently for AM and PM peaks. For example, motorists are more likely to utilize Peninsula/Airport/US-101 northbound ramps to travel to the project site in the morning than from Anza Blvd. which is nearly three times longer in distance. The methodology used in the IS/MND for trip distribution is not plausible and will present inaccurate representation of impacts.	2-14
Page 24	The IS/MND assumes 60% of project trips will travel northbound US-101 but only 25% of trips travel SB, including southbound local and freeway destinations. The IS/MND does not provide justification for this assumption. Existing data in the form of an origin-destination analysis for the existing office buildings show the split on Airport Dr. to be closer to 55% northbound/45% southbound. The IS/MND is inconsistent with existing data and is not accurately representing the impact of the project.	2-15
Page 24	The IS/MND assumes 5% of motorists would travel north to Broadway to access southbound US-101. The IS/MND does not provide justification of this assumption and is inconsistent with existing data. The EIR does not accurately represent the impact of the project.	2-16
Page 24	The City of San Mateo is actively working with the North Shoreview neighborhood to curtail afternoon peak hour cut-through traffic from Peninsula Avenue, the IS/MND does not account for the existing conditions of this effort. The City of Burlingame is aware of this effort. The IS/MND should not assume that westbound left-turns can be made onto southbound N. Bayshore Blvd. The IS/MND does not reflect the current traffic conditions and projects and therefore does not accurately represent the impacts as a result of the project.	2-17
Page 28	The IS/MND showed that there will be vehicle traffic overflows at Airport Blvd/Coyote Point/Peninsula Avenue but the IS/MND does not show whether it will extend to the upstream intersection. Without that information, it is not possible to understand the real impacts of the project. The IS/MND does not accurately represent the existing conditions and future impact.	2-18
Page 28	The adjustments of the peak hour factor is not well explained and defined. The IS/MND does not demonstrate the actual conditions.	2-19
Page 30	The county VMT per employee value used is significantly higher than what other jurisdictions in the county are using. For example, the City of San Mateo uses a countywide VMT per employee rate of 18.0 and the City of Redwood City uses a rate of 17.6. The IS/MND is using data that is inconsistent with neighboring jurisdictions and therefore does not accurately depict future impact as a result of the project.	2-20
Page 36	The IS/MND does not provide mitigations to address the queueing deficiency identified at Airport Blvd/US-101 northbound ramps.	2-21
Page 47	The IS/MND does not provide mitigations to address the queueing deficiency identified at Airport Blvd/US-101 northbound ramps and Airport Blvd/Coyote Point/Peninsula Ave?	2-22
Page 53	Correct the heading to read “9.4 North Shoreview Neighborhood Analysis”	2-23
Page 53	The City of San Mateo has approved (not adopted) traffic action plans for 14 (not 28) of its 28 neighborhoods.	2-24

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July 29, 2021

Ruben Hurin, Planning Manager
City of Burlingame
Community Development Department, Planning Division
501 Primrose Road
Burlingame, CA 94010-3997

Re: 567 Airport Blvd. – Proposed Negative Declaration

Dear Mr. Hurin:

We are counsel to the property owner of 533 Airport Boulevard, Burlingame, California we are submitting the following comments on its behalf.

We have reviewed the following documents that were publicly provided:

1. Notice of Intent to Adopt a Mitigated Negative Declaration
2. Project Plants for 567 Airport Boulevard (Burlingame Bay)
3. Burlingame Bay Graphics Package
4. 567 Airport Boulevard Project – Initial Study – Mitigated Negative Declaration including Exhibits A through F
5. November 23, 2020 Staff Report
6. 567 Airport Boulevard – Miscellaneous Attachments

Please accept the following as our comments on these documents and the related proposed development.

TRAFFIC ISSUES:

The location of the proposed new commercial building has severely constrained access that is already impacted and will be further impacted by newly constructed, but not yet occupied buildings. The proposed building will be located in an area set back from a narrow, four lane road which is the only ingress and egress point for a significant number of commercial office buildings and hotels. The southerly portion of the road, Airport Boulevard, narrows to two lanes not far from the location of the proposed development and there is no direct ingress or egress connection with Southbound Highway US 101. 3-1

The only direct connection with Southbound Highway US 101 is the Broadway Burlingame

freeway exit. If that access is blocked or significantly occluded, there will be only one single entry and exit point for the proposed project and all of the commercial and hotel occupants down a two-lane road. No analysis of the effect of a total or partial blockage of that access is provided in the traffic study. 3-1 (cont.)

The traffic study, on which the proposed Negative Declaration relies, appears to address, in Section 5, on page 31, other approved and reasonably forseeable projects, but the analysis fails to provide sufficient information for a review. The report specifically states "[t]he Background conditions were developed using available turning movement counts from each project's Traffic Impact Analysis. The trips were distributed throughout the network based on that available information from the Traffic Impact Analysis reports." None of these reports were provided to determine whether they suffer from similar issues as discussed herein. Thus, reliance on these other reports likely compounds the understatement of traffic at the respective intersections. That Table 8 shows not one single intersection with an F Level of Service and only four with a D Level of Service, substantiates that the study is flawed, given the limited access and the overall increase of use on Airport Boulevard and the likelihood, as discussed below, of the underutilization of Transportation Demand Management Plans. 3-2

According to the report, "The proposed project is expected to generate 2,338 total daily trips, including 278 new a.m. peak hour trips (239 in, 39 out) and 276 net new p.m. peak hour trips (44 in, 232 out)." In other words, the report concludes that only about 10% of the trips will be during morning peak hours and approximately 10% during evening peak hours. There is no information provided to support this conclusion that approximately 80% of the traffic generated will be during non-peak hours. 3-3

In addition, there appears to be no consideration of the fact that the existing buildings that will be part of the overall complex being analyzed, have primarily been vacant for a significant period of time, therefore understating existing traffic counts and understating the additional number of trips that will occur when the project as a whole is completed and leased. Parking at the rates required by the Burlingame Municipal Code would require just under 1,700 spaces. With each space indicating two trips per day at a minimum, the additional trips from this project are understated in the report by around 1,000 trips per day. 3-4

The specifics of the Traffic Demand Management Program for this project are not set out, but historically the adjustments made to traffic impact are overstated because historically, these Programs and underutilized and the requirements generally unenforced. An analysis of the projected traffic, adjusting for the currently empty buildings and without any mitigation efforts should be provided to see, in essence, a worse case scenario. 3-5

EMERGENCY ACCESS ISSUES:

Emergency access and evacuation impact is dealt with in a summary and insufficient manner. The Draft Report states: "The City does not have an established evacuation plan; however, the Project would adhere to the guidelines established by the Community Safety Element of the Burlingame General Plan. Although the Project would add additional vehicles to Airport Boulevard, their presence would not physically interfere with one's ability to evacuate in the event of an emergency. Therefore, the Project would not conflict with an adopted emergency response or evacuation plan. Impacts would be less than significant." Despite the shocking fact that there is no evacuation plans for the thousands of people that work and those who stay in the hotels along Airport Boulevard a narrow two to four lane road, there seems to be no analysis support the impact conclusion. Exactly how the "less than significant impact" conclusion was reached is unstated. An actual plan and an actual analysis should be undertaken. 3-6

OTHER MATTERS THAT SHOULD BE CONSIDERED:

Although not necessarily required in an environmental study, additional impacts of this project should be studied such as the impact of a potential long term drought and the increase in the jobs to homes ratio in an area already severely impacted by the lack of available and affordable housing. 3-7 3-8

Charles S. Bronitsky
Attorney at Law