

MEMORANDUM

Date: September 21, 2022

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From: Andrew Metzger, Project Manager
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Subject: 1855-1881 Rollins Road Multiunit Residential Development Project
Class 32 Categorical Exemption Determination

INTRODUCTION

The City of Burlingame (the City) has received an application for construction of a new 420-unit residential development at 1855-1881 Rollins Road (project). The City is the lead agency under the California Environmental Quality Act (CEQA), and the project applicant is The Hanover Company. The proposed project would comprise 420 apartment units, 11,901 square feet of lobby and amenity space, three interior common courtyards, and three exterior public plazas. This memorandum evaluates the applicability of categorical exemption(s) for the project improvements in accordance with CEQA.

CATEGORICAL EXEMPTION OVERVIEW

Section 21084 of the California Public Resources Code specifically requires the CEQA Guidelines to include a list of classes (or categories) of projects that have been determined not to have a significant effect on the environment and are therefore exempt from the provisions of CEQA. The CEQA Guidelines Sections 15301 through 15333 constitute the list of categorically exempt projects and contain specific criteria that must be met in order for a project to be found categorically exempt. Additionally, Section 15300.2 of the CEQA Guidelines includes a list of exceptions to the use of categorical exemptions, none of which may apply to a project for it to qualify for a categorical exemption.

PROJECT DESCRIPTION

Project Location

The project site is within the northern part of Burlingame and encompasses the majority of three contiguous parcels in San Mateo County.¹ The 4.993-acre project site is within the North Rollins Road

¹ While the three parcels measure 5.023 acres in total, the project site is defined as the 4.993-acre area of permanent and temporary disturbance. The remaining 0.03 acre would be fenced off and would not be temporarily or permanently altered by construction or operation of the project. Therefore, it is not considered a part of the project site.



Mixed Use District (RRMU) and the Envision Burlingame General Plan (2040 General Plan) land use designation is Live/Work.² The project site is bounded to the east by Rollins Road, to the west by the Caltrain tracks, to the north by Broderick Road, and to the north by a drainage right-of-way and the City Limit line between Burlingame and Millbrae. **Figure 1** shows a map of the project location, **Figure 2a** and **Figure 2b** show the project layout and open space plan, and **Figure 3** shows a rendering of the project.

Site Conditions

The project site is developed with three one-story industrial buildings occupied by a moving company, tile store, community theater group, catering company, and basketball training facility. The small (9,339 square foot) parcel at the southern western edge of the project site is an abandoned Union Pacific Railroad (UPRR) spur. The project site includes paved parking lots and limited landscaping around the perimeter of each building. Access to the project site is provided along Rollins Road and Broderick Road. The project site is surrounded by office/warehouse, commercial recreation, and industrial uses and is located one-half mile southeast of the Millbrae Transit Center. The San Francisco International Airport is located approximately 0.75 mile to the north.

² City of Burlingame. 2019. Burlingame General Plan. Available: https://www.burlingame.org/departments/planning/general_plan_update.php. Accessed April, 2022.



Project Site Map

Figure

Source: The Hanover Company, 2022



Open Space Diagram – Floor 1

Figure

02a

1855 – 1881 Rollins Road Multiunit Housing Project



3,446 SF PRIVATE OPEN SPACE
FLOOR 5 - OPEN SPACE
1" = 60'-0"



2,632 SF PRIVATE OPEN SPACE
FLOOR 3 - OPEN SPACE
1" = 60'-0"



3,303 SF PRIVATE OPEN SPACE
FLOOR 4 - OPEN SPACE
1" = 60'-0"



1,972 SF PRIVATE OPEN SPACE
FLOOR 2 - OPEN SPACE
1" = 60'-0"

OPEN SPACE CALCULATIONS	
NAME	AREA
COMMON	
COURTYARD A	11,380 SF
COURTYARD B	5,893 SF
COURTYARD C	7,030 SF
LOGGIA A	1,656 SF
LOGGIA B	1,600 SF
OPEN SPACE A	2,777 SF
OPEN SPACE B	897 SF
OPEN SPACE C	3,138 SF
PUBLIC PLAZA A (50%)	1,912 SF
PUBLIC PLAZA B	2,072 SF
PUBLIC PLAZA C (50%)	501 SF
TOTAL COMMON	38,934 SF
PRIVATE	
FLOOR 1 DECKS	1,406 SF
FLOOR 2 DECKS	1,972 SF
FLOOR 3 DECKS	2,632 SF
FLOOR 4 DECKS	3,303 SF
FLOOR 5 DECKS	3,446 SF
TOTAL COMMON AND PRIVATE	51,693 SF

OPEN SPACE LEGEND

	COMMON OPEN SPACE
	PRIVATE OPEN SPACE MIN. 5' x 5'

OPEN SPACE COMPLIANCE

REQUIRED: 125 SF/UNIT:	52,500 SF
PROVIDED: COMMON OPEN SPACE:	38,934 SF
PRIVATE OPEN SPACE:	12,759 SF
TOTAL:	51,693 SF



Open Space Diagram – Floors 2 - 5

Figure

02b



Project Components

The applicant proposes to demolish all three existing structures and merge the three parcels prior to construction. The project would comprise 420 residential apartment units and 11,906 square feet of lobby and amenity space in a 5-story, 64-foot multifamily building. The residential units would include 50 studio units, 233 one-bedroom units, 119 two-bedroom units, and 18 three-bedroom units, with 35 units (10 percent of the project's base unit count of 350 units) designated affordable for low-income households (80 percent of San Mateo County's Area Median Income for 55 years). The project would include a total of 545 off-street parking spaces 539 of which would be located in a 6-level, above-ground parking garage. Six spaces of surface parking would be provided near the lobby. The project would also include three interior common courtyards and three exterior public plazas (see **Figure 2a** and **Figure 2b**).

Landscaping and Open Space

In accordance with the City's requirements, each lot developed with a multifamily residential use is required to provide a minimum of one 24-inch box-sized, non-fruit tree for every 2,000 square feet of lot coverage. Based on the size of the project, a total of 64 landscape trees are required. A total of 76 new landscape trees are proposed on-site and 22 street trees (Australian Willow, 36-inch box size) are proposed in the right-of-way along Rollins Road and Broderick Road.

RRMU zoning standards require that the project supply 125 square feet of open space for each residential unit. Areas that can count towards the open space requirement include private open spaces (e.g., patios or balconies) that are a minimum of five by eight feet in dimension, common open spaces (e.g., yards, dog parks, courtyards), and public open spaces (e.g., plazas or paseos), including up to 50 percent of the square footage of required plazas. Between 20 and 50 units on each floor would have private open spaces large enough to comprise 12,759 square feet of the open space requirement. The common open space proposed for the project totals 34,449 square feet and includes Open Spaces A and B along Broderick Road and Open Space C at the northwest corner of the site that includes a dog run (see **Figure 2a** and **Figure 2b**). Three common open spaces are proposed at the interior of the building and would be connected by two loggias (i.e., outdoor corridors with fully covered roofs and an outer wall that is open to the elements). The courtyards and loggias include various amenities such as pools, cabanas, outdoor lounges, BBQ grills, banquet and bar seating areas, shuffleboard courts, ping pong tables, televisions, and water features. The project would also include 6,898 square feet of public open space, 4,485 square feet of which can be counted towards the open space requirement. The public open spaces that are eligible include 50 percent of Plaza A and Plaza C and all the square footage for Plaza B. The project does not meet the minimum open space requirement with approximately 51,693 square feet of open space (123 square feet per unit), where 52,500 square feet (125 square feet per unit) is required. The applicant has applied for a development waiver for this standard based on the state density bonus.

Stormwater Treatment and Drainage

Construction of the project would require over 1 acre of ground disturbance, and as such, would be subject to the National Pollution Discharge Elimination System (NPDES) Municipal Regional Permit, under Regional Water Board Order R2-2015-0049. Per the San Mateo Countywide Water Pollution Prevention Program Technical Guidelines, the project site is classified as a Category C Special Project

(transit-oriented development) and is eligible for low impact design (LID) treatment reduction credits³. The total potential LID reduction credit is 55 percent. The project footprint currently includes 93,601 square feet of non-LID treated area, but is eligible for up to 115,201 square feet. The project would treat 100 percent of stormwater runoff onsite using LID treatment measures, such as diverting roof runoff to vegetated areas. The project would include 10 drainage management areas and 8 bioretention areas that would be used to treat stormwater on site. The total bio-retention treatment area would be 3,434 square feet.

Aesthetic Considerations

Exterior materials proposed for the project include stucco, Allura siding, fiber cement siding, tile, glass railings, aluminum composite material panels, painted concrete, and vinyl windows and doors for the residential units and an aluminum storefront for the lobby and amenity spaces at the main building entrance. A seven-foot-tall fence would line the northern and western portion of the project site. **Figure 3** presents a rendering of the project.

Construction

Project construction is anticipated to begin in April 2023 and conclude in February 2025 for a total duration of 22 months. Construction would be completed in one phase and would include typical activities such as demolition, site grading, foundation and concrete work, framing, and interior and exterior architectural coatings. Typical construction equipment such as backhoes, heavy duty trucks, and excavators would be used at the project site. No pile driving would be required. Construction would require the demolition and removal of approximately 125,000 square feet of existing improvements on the site. Approximately 9,700 cubic yards of imported fill material would be required.

The project would require lateral connections to storm drain, sanitary sewer, and domestic water which exist in the public right-of-way along Rollins Road and Broderick Road. The project would connect to existing electrical lines that exist in Broderick Road and immediately north of the project site.

Remediation

A Phase I Environmental Site Assessment (ESA) and a Phase II ESA were conducted for the project site.^{4,5}

The Phase I ESA (Attachment A) did not find documentation or physical evidence of soil or groundwater impairments associated with the use or past use of the property. A review of regulatory databases maintained by county, state, tribal, and federal agencies found no documentation of hazardous materials violations or discharge on the property and did not identify contaminated facilities within the appropriate American Society for Testing and Materials search distances that would reasonably be expected to impact the property. Based on the findings of this assessment, no Recognized

³ Low Impact Design (LID) refers to systems and practices that use or mimic natural stormwater processes in order to protect water quality and aquatic habitat. The City of Burlingame has LID requirements for new development and redevelopment projects. The project qualifies for a 25 percent location credit, 20 percent density credit, and 10 percent parking credit.

⁴ Engeo Incorporated. 2021. *Phase I Environmental Site Assessment, 1845-1885 N. Rollins Road*. August 11, 2021.

⁵ Engeo Incorporated. 2021. *Phase II Environmental Site Assessment, 1845-1885 N. Rollins Road*. October 19, 2021.



Environmental Conditions (RECs), no historical RECs, and no controlled RECs were identified for the project site.

The Phase II ESA (Attachment B) was conducted to evaluate potential contaminants at the project site that may affect workers or the public during construction. The investigation consisted of soil sampling. The Phase II ESA found elevated concentrations of lead in the soil at the terminus of a former rail spur. Detected levels exceeded environmental screening levels (ESLs).⁶ Arsenic and benzo(a)pyrene were also identified on the property, but were determined not to be environmental risks as they did not exceed their respective ESLs. Given the results of the Phase II ESA investigation, the railroad spurs are considered a recognized environmental concern that may be dangerous to humans if not properly handled and disposed of.

A site-specific soil and groundwater management plan (SMP) would be prepared by the applicant and enforced by the applicable regulatory agency to manage potentially affected soil. The SMP would present procedures and protocols for soil management during demolition, grading, and construction activities, as well as provide protocols in the event that unforeseen environmental conditions are encountered during construction activities.

Permits and Approvals

Anticipated permits and approvals are listed in **Table 1** below.

Table 1 Permits and Approvals

Permitting Agency	Permit/Approval	Timing
Regional Water Quality Control Board	NPDES	Prior to construction
Federal Emergency Management Agency	Letter of Map Revision	Prior to construction
City of Burlingame	Density Bonus	Concurrent with Project Approval
City of Burlingame	Design Review	Prior to construction

⁶ ESLs were based on the San Francisco Regional Water Quality Control Board's ESLs that provide conservative screening levels for chemicals found at sites with contaminated soil and groundwater.

CATEGORICAL EXEMPTION STATUS

The project qualifies for a Class 32 Exemption: Pursuant to Section 15301(c) of the 2022 *CEQA Statute and Guidelines* (CEQA Guidelines), the project is categorically exempt from CEQA, as it meets the criteria for a Class 32 Infill Development project. The following analysis documents the project's consistency with each requirement for a Class 32 Infill Development exemption.

Section 15332. Infill Development

Class 32 consists of projects characterized as in-fill development meeting the conditions described in this section.

(a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

The project site is designated by the 2040 General Plan as Live/Work and zoned RRMU under the City's Zoning Code. The Live/Work designation is intended to promote a mix of medium-density residential buildings and workspaces, and the RRMU purpose is to implement the Live/Work designation by creating and sustaining a new neighborhood of live/work units and developments, small-scale support commercial businesses, and other employment uses within easy walking distance to the Millbrae multimodal transit station. As a medium-density residential building, the project would be consistent with this land use designation.

The RRMU zone has specific development standards, ranging from Tier 1 (Base Standard intensity) to Tier 3 (Maximum Intensity). The project would be a Tier 3 (Maximum Intensity) project. Tier 3 projects within the RRMU zone are allowed a maximum intensity of 70 dwelling units (DUs) per acre. The project would construct 420 new DUs which exceeds the maximum intensity by 70 units. However, the project qualifies for a housing density bonus, consistent with California's Density Bonus Law⁷ and the City's Density Bonus Ordinance⁸ because it would include 35 below-market-rate housing units (for low income households), which the applicant would maintain as affordable housing units for 55 years.

RRMU zoning includes the following standards:

- Maximum height of seven stories (80 feet)
- Minimum setback requirement of 10 - 20 feet
- Maximum lot coverage of 60 percent⁹

⁷ State of California. 2019. *California Government Code Title 7, Division 1, Chapter 4.3: Density Bonuses and Other Incentives [65915–65918]*. Available: https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=65915&lawCode=GOV. Accessed April, 2022.

⁸ City of Burlingame. 2021. Burlingame Zoning Ordinance. Available: https://content.qcode.us/lib/burlingame_ca/pub/municipal_code/files/zoning_ordinance.pdf. Accessed April, 2022.

⁹ According to the City of Burlingame Zoning Ordinance, lot coverage may be increased if additional useable common open space equivalent to the additional lot coverage (in square feet) is provided on a podium-level (non-rooftop) landscaped courtyard or plaza.

- Minimum open space of 125 square feet per housing unit (52,500 square feet for 420 units)
- Minimum of 20 percent landscape coverage

The project would have a residential density of 84.1 DUs per acre, a maximum height of 64 feet, 10- to 20-foot setbacks, a lot coverage of 59.4 percent, 51,693 square feet of open space, and 15.9 percent landscape coverage. The proposed building height, lot coverage, and setbacks meet the RRMU zoning development standards.

The proposed density exceeds the RRMU zoning development standards and the proposed landscape coverage and open space do not meet RRMU zoning development standards. However, the Housing Density Bonus law permits cities and counties to reduce or waive landscape coverage and open space standards and allows for a floor area ratio bonus if 20 percent of the proposed units are designated very low income. With application of the density bonuses waivers for development standards, the project design would be consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

(b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

The project site is within the incorporated limits of the City of Burlingame. The project site encompasses the majority of three parcels (1881 Rollins Road, 1885 Rollins Road, and an abandoned Union Pacific Railroad spur) totaling 4.993 acres.¹⁰ The project site is in an urbanized area and is entirely surrounded by industrial, office, and commercial developments. The closest major freeway is US 101, east of the project site. CEQA defines a qualified urban use as “any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses.” Therefore, the project adheres to the criteria of CEQA Guidelines Section 15332(b) as a site of no more than 5 acres that is substantially surrounded by urban uses.¹¹

(c) The project site has no value as habitat for endangered, rare, or threatened species.

The project site is fully developed with existing industrial and commercial uses. With the exception of the abandoned rail spur and minimal landscaping, the project site is comprised of pavement for surface parking and three one-story industrial style buildings. The project site does not support natural vegetation communities or high quality habitat resources for any special-status species.

Existing ornamental trees on the project site may be suitable nesting areas for migratory birds. The following goals and strategies from the 2040 General Plan would be applicable to the project during the construction period.¹² Compliance with these 2040 General Plan strategies during construction would

¹⁰ The combined area of the three parcels is greater than five acres (5.023 acres). However, as recently demonstrated in *Protect Tustin Ranch v. City of Tustin (Costco Wholesale Corporation, Real Party in Interest)* (2021) 70 Cal.App.5th 951, the term “project site” under CEQA is defined as the area “which will be disturbed [by new development or construction] as part of the project” and not the total parcel size.

¹¹ Governor’s Office of Planning and Research. 2021. *California Environmental Quality Act Statutes and Guidelines*. Section 15332, p. 288.

¹² City of Burlingame Department of Parks and Recreation. 2018. *Private Protected Tree FAQ*. Available: https://www.burlingame.org/burlingameparksandrecs/trees/private_protected_tree_faq.php. Accessed May 2022.

ensure that the project would not result in significant impacts on trees and wildlife species that use the trees, including migratory birds.

- **HP-5.2: Migratory Birds.** Identify and protect habitats that contribute to the healthy propagation of migratory birds, including trees and natural corridors that serve as stopovers and nesting places. Avoid construction activities that involve tree removal between March and June, unless a bird survey has been conducted to determine that the tree is unused during the breeding season by avian species protected under California Fish and Game Codes 3503, 3503.5, and 3511.
- **HP-5.5: Protection and Expansion of Tree Resources.** Continue to preserve and protect valuable native trees and introduce species that contribute to the urban forest but allow for the gradual replacement of trees for ongoing natural renewal. Consider replacement with native species. Use zoning and building requirements to ensure that existing trees are integrated into new developments.
- **HP-5.6: Tree Preservation Ordinance.** Continue to adhere to the Burlingame Tree Preservation Ordinance (Burlingame Municipal Code Title 11); ensure the preservation of protected trees, as designated by the ordinance; and continue to be acknowledged by the Arbor Day Foundation as a Tree City USA.
- **HP-5.7: Urban Forest Management Plan.** Continue to update and use the Burlingame Urban Forest Management Plan, which integrates environmental, economic, political, historical, and social values for the community for guidance on Best Management Practices (BMPs) related to tree planting, removal, and maintenance, including onsite protection of extant trees and street trees during projects.
- **HP-5.14: Compliance with Environmental Laws.** Ensure that all projects affecting resources of regional concern satisfy regional, state, and federal laws.

(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Traffic

A transportation impact study was prepared by W-Trans Transportation Consultants and is included in this document as Attachment C. The study analyzed daily vehicle trip generation, access and circulation, bicycle and pedestrian facilities, and vehicle miles traveled (VMT).

Consistency with Programs, Plans, Ordinances, and Policies Addressing the Circulation System

The project was evaluated to determine whether it would conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bicycle racks, Class IV bikeways, etc.) or generate pedestrian, bicycle, or transit travel demand that would not be accommodated by existing transit, bicycle, or pedestrian facilities and plans. As discussed under **criteria (a)** above, the project would be consistent with the existing 2040 General Plan land use designation (Live/Work) and zoning (RRMU). The project would also support implementation of General Plan Policy CC-12.3:

- **Policy CC-12.3:** Establish a creative Live/Work district at the north end of the Rollins Road corridor within approximately one-half mile of the Millbrae multimodal transit station;

accommodate medium- and high-density residential uses either as stand-alone development or as integrated live/work environments.

The following subsections discuss how the project would support programs, plans, ordinances, and policies addressing pedestrian, bicycle, and transit circulation.

Pedestrian Facilities

Continuous sidewalks currently exist on Rollins Road adjacent to the project site. As part of the project, sidewalks would be added to the west side of Broderick Road to connect to the sidewalks on Rollins Road and facilitate pedestrian access to the project site. Provision of additional sidewalk on Broderick Road would support the following General Plan policies related to pedestrian circulation.

- **Policy CC-1.3:** Promote walkable neighborhoods and encourage pedestrian activity by designing safe, welcoming streets and sidewalks that incorporate signalized crosswalks, attractive lighting and landscaping, curb extensions, and traffic-calming measures at appropriate locations.
- **Policy CC-12.9:** Promote a pedestrian-friendly environment, particularly in the Live/Work district. Require new development to create active street frontages, with workspaces or commercial uses on the ground floor, attractive landscaping and street trees, and other streetscape enhancements as appropriate.
- **Policy M2.1:** Expand pedestrian access by eliminating gaps in sidewalk and path networks, improving safety, and requiring safe and comfortable pedestrian facilities.

Bicycle Facilities

Near the project site, Class II bike lanes exist on California Drive between Murchison Drive and Broadway. Bicycle lanes also exist on the southbound side of Rollins Road between Broderick Road and Marsten Road. Class III bike lanes exist on the southbound side of Rollins Road between Millbrae Avenue and Broderick Road, as well as the northbound side of Rollins Road between Broadway and Millbrae Avenue. Planned improvements include Class I bikeways on California Drive, Class II bike lanes on Adrian Road, and Class IV bikeways on Rollins Road. While the project does not include any additional improvements to the City's bicycle path network, it would provide 210 stalls of bicycle parking in both vertical racks and two-tier pull down tray, and 22 bicycle parking spaces in plaza bike racks to support the use of existing and planned facilities. Therefore, the project would support implementation of the following 2040 General Plan policies related to bicycle circulation.

- **Policy M-3.6:** Provide standards in the Zoning Code that address required bicycle parking, including provisions for secured facilities, as well as other development features and incentives that encourage bicycle use (e.g., changing rooms at places of business).
- **Policy M-8.2:** Support vehicle trip reduction strategies, including building safer and more inviting active transportation networks, supporting connections to high frequency and regional transit, implementing TDM programs, and integrating land use and transportation decisions.

Transit

The project would add 420 units of new housing in an area with access to several forms of transit. The San Mateo County Transit District (SamTrans) provides fixed route bus service in Burlingame and

throughout San Mateo County. Route 397 provides service between San Francisco and Palo Alto with stops on El Camino Real in Burlingame. Route ECR provides service between Daly City BART and Palo Alto with stops on El Camino Real. The Rollins/Guittard bus stop is located approximately 500 feet east of the project site on Rollins Road.

Additionally, the Millbrae Caltrain Station is located approximately one-quarter mile northwest of the project site (a nine-minute walk). Caltrain is the commuter rail line serving the San Francisco Peninsula. It connects Burlingame with San Francisco to the north and San José and Gilroy to the south. On weekdays there are 104 trains servicing the Millbrae Station in the northbound and southbound directions, 46 of which provide limited-stop service, and another 12 provides express service. Given that the project would place new housing within a transit-rich area of the City, the project would support the following 2040 General Plan policies related to transit.

- **Policy M-6.1:** Plan for and accommodate land uses that facilitate development of compact, mixed-use development with the density, diversity of use, and local accessibility supportive of transit use.
- **Policy M-8.2:** Support vehicle trip reduction strategies, including building safer and more inviting active transportation networks, supporting connections to high frequency and regional transit, implementing TDM programs, and integrating land use and transportation decisions.

Vehicle Miles Traveled

California Senate Bill 743 (SB 743) was signed by Governor Newsom in 2013 and implemented into CEQA regulation in 2018. Under SB 743 traffic congestion is no longer considered an environmental impact under CEQA and instead, the amount of driving – as measured by vehicle miles traveled (VMT) – is the new lens for assessing traffic impacts because it more directly relates to physical environmental impacts, such as GHG emissions.

Because the City of Burlingame has not yet adopted a standard of significance for evaluating VMT, guidance provided by the California Office of Planning and Research (OPR) publication *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory*, 2018, was used to evaluate the potential increase in VMT associated with the project.

According to OPR guidance, a residential project that generates vehicle travel that is 15 or more percent below the existing citywide residential VMT per capita may indicate a less-than-significant traffic impact. The citywide VMT per capita for Burlingame is 13.64, which means a significance threshold of 11.59 miles per capita. Based on OPR guidance, the project would have an estimated VMT rate of 3.4 miles per capita in the 2022 opening year, which is well below the 15 percent significance VMT threshold. Additionally, CEQA Guidelines Section 15064.3(b)(1) indicates that projects within one-half mile of either an existing major transit stop or a stop along an existing transit corridor should be presumed to cause a less than significant transportation impact. The project site is less than half a mile from the Millbrae Train Station. Therefore, the project would not have a significant impact on VMT.

Hazards from Geometric Design Features

The project includes a six-level parking garage which would be accessed via two new driveways on Rollins Road at the northeast corner of the project site and on Broderick Road at the southwest corner of the project site. The project also includes the removal of seven existing driveways serving the

previous land uses, reducing the site's total number of vehicular access points from seven to two. Access points for parking facilities are required to be free and clear of obstructions to provide adequate sight distance, thereby ensuring that drivers see pedestrians on the sidewalk as well as bicycles and other vehicles. The entrance/exit locations would not have any visual obstructions that could prevent a driver from seeing oncoming vehicles, pedestrians, or bicyclists. Any landscaping, signage, or above-ground transformers would be required to be installed so as to ensure an unobstructed view for drivers when exiting the site. The project driveway would meet Caltrans standards for stopping sight distance. Additionally, parking would be prohibited within 10 feet of the project driveways through the use of red curb. Existing or proposed landscaping between drivers exiting the site and oncoming vehicles should be either low-lying (three feet high or less) or else trees with all branches trimmed to a minimum height of seven feet above the roadway elevation.

Pedestrian access to the project site would be provided at the main entrance facing Rollins Road at the northeast corner of the project site. Two secondary entrances, one on Rollins Road and one on Broderick Road, would be provided as well. New sidewalks are also proposed along the project site frontage on Broderick Road. Internal sidewalks and pathways would be provided within the project site to access the different buildings and parking garage. Because the project would provide well connected and unobstructed access for drivers and pedestrians, the project would not have a significant impact on access and circulation.

Emergency Access

Emergency response vehicles would be able to service the site via Rollins Road to the east, Broderick Road to the south, and two proposed access aisles on the north and west edges of the project site. Since all roadway users must yield the right-of-way to emergency vehicles when using their sirens and lights, the added project-generated traffic would not impact access for emergency vehicles. Additionally, the project would improve emergency access to the project site by adding a through connection on the southwest side of the site.

Noise

Noise-sensitive land uses are generally defined as locations where people reside or the presence of unwanted sound could adversely affect the use of the land. Noise-sensitive land uses typically include single- and multi-family 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 surrounded predominantly by industrial and commercial land uses. The closest sensitive receptors to the project are mixed-use residential developments approximately 450 feet west of the project site in a mixed-use development between California Drive and El Camino Real, south of Millbrae Avenue. According to the 2040 General Plan Environmental Impact Report (EIR), the apartments are located in a transportation noise contour area that typically experiences between 65 and 70 dBA CNEL, which represents a time-weighted 24-hour average noise level. These elevated noise levels are due to the receptor's proximity to California Drive and the Caltrain tracks.

As part of the 2040 General Plan EIR, the City of Burlingame analyzed a typical set of construction equipment and estimated noise levels at a range of distances from a given project site, assuming no noise shielding from intervening development. The results of this analysis are shown in **Table 2**.

Construction equipment for the project would be typical for residential and commercial projects, and similar to the equipment evaluated in the Burlingame General Plan EIR. The project applicant has verified to the City that construction equipment planned for use at the project site would have maximum sound level (Lmax) values consistent with or lower than those shown in **Table 2**. As shown in the table, noise from the loudest construction equipment would attenuate to less than 65 dBA at 450 feet, which is less than the existing ambient noise levels at the nearest sensitive receptor.

Table 2 Typical Construction Equipment Noise Levels (dBA)

Equipment	Reference Noise Level at 50 Feet (Lmax) ¹	Percent Usage Factor ²	Predicted Noise Levels (Leq) at Distance ³					
			50 feet	100 feet	150 feet	250 feet	350 feet	450 feet
Bulldozer	85	40	81	75	71	67	64	62
Backhoe	80	40	76	70	66	62	59	57
Compact Roller	80	20	73	67	63	59	56	54
Concrete Mixer	85	40	81	75	71	67	64	62
Crane	85	16	77	71	67	63	60	58
Excavator	85	40	81	75	71	67	63	60
Generator	82	50	79	73	69	65	62	60
Pneumatic Tools	85	50	82	76	72	68	65	63
Scraper	85	40	82	76	72	68	64	62
Delivery Truck	85	40	81	75	71	67	64	62
Vibratory Roller	80	20	81	75	71	67	64	62

Source: City of Burlingame, 2018

¹ Lmax noise levels based on manufacturer's specifications.

² Usage factor refers to the amount of time the equipment produces noise over the time period.

³ Estimate does not account for any atmospheric or ground attenuation factors. Calculated noise levels based on Caltrans, 2009: $Leq \text{ (hourly)} = L_{max} \text{ at } 50 \text{ feet} - 20 \log (D/50) + 10 \log (UF)$, where: Lmax = reference Lmax from manufacturer or other source; D = distance of interest; UF = usage fraction or fraction of time period of interest equipment is in use.

Lmax= maximum sound level; Leq = equivalent continuous sound level

Project construction would comply with the following 2040 General Plan policies:

- Requiring the design of new residential development and office development to comply with protective noise standards (Policies CS-4.2 and CS-4.3, respectively)
- Complying with real estate disclosure requirements pertaining to existing and planned airports within 2 miles of the sale or lease of a property (Policy CS-4.9)

During construction, the project would comply with Chapter 18.07.110 of the Municipal Code, which states that no person shall erect, demolish, alter, or repair any building or structure outside the hours between 8:00 a.m. and 7:00 p.m. on weekdays or 9:00 a.m. and 6:00 p.m. on Saturdays; no construction

shall take place on Sundays and holidays, except under circumstances of urgent necessity in the interest of public health and safety. Because construction of the project would not result in an increase in noise levels above existing conditions at the nearest sensitive receptor, and because the project would be consistent with all relevant 2040 General Plan and Municipal Code requirements, construction of the project would not have a significant noise impact.

During operation the project would not introduce a new noise-generating land use type that would be incompatible with the neighboring industrial and commercial land uses. The project would comply with the City's Municipal Code standards that limit noise from mechanical equipment, such as air conditioners and generators, to 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). Therefore, operation of the project would not result in a significant noise impact.

Air Quality

An air quality report evaluating construction emissions was prepared by Rincon Consultants (Rincon) and is included in this document as Attachment D. The project site is in the San Francisco Bay Area Air Basin (SFBAAB), which is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). The BAAQMD adopted thresholds of significance to assist lead agencies in the evaluation and mitigation of air quality impacts under CEQA. The BAAQMD thresholds, which are incorporated in the 2017 CEQA Air Quality Guidelines (CEQA Guidelines)¹³, establish the levels at which emissions of ozone precursors (reactive organic gases [ROGs] and nitrogen oxides [NOx]), particulate matter (PM), local carbon monoxide (CO), sulfur dioxide (SO₂), and toxic air contaminants (TACs) would cause significant air quality impacts. The regulation of two fractions of PM emissions is based on aerodynamic resistance diameters equal to or less than 10 microns (PM₁₀) and 2.5 microns (PM_{2.5}).

Construction Emissions

Construction of the project has the potential to create short-term air quality impacts through the use of heavy-duty construction equipment, construction worker vehicle trips, truck trips for material hauling, earthmoving, the application of architectural coatings, and paving. Similar to operational criteria air pollutants (CAPs), BAAQMD provides screening-level guidance for construction emissions. The screening-level size for construction CAPs pertaining to mid-rise apartments is 240 DUs. Because the project proposes 420 DUs, it would not meet the screening criteria. Thus, a quantitative analysis of construction CAPs was performed.

Table 3 summarizes the estimated maximum daily emissions of ROG, NOx, CO, SO₂, PM₁₀, and PM_{2.5} associated with project construction. As shown in **Table 3**, the project's construction activities would not exceed BAAQMD's thresholds of significance for construction-related activities. Consequently, the project would not have a significant impact on air quality during construction.

Table 3 Project Construction Emissions

¹³ 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: May, 2022.

Maximum Daily Emissions						
Construction Year	ROG	NO _x	CO	SO ₂	PM ₁₀ Exhaust	PM _{2.5} Exhaust
2023	2	30	22	<1	1	1
2024	36	19	30	<1	1	1
2025	35	11	20	<1	<1	<1
Maximum Daily Emissions	36	30	30	<1	1	1
BAAQMD Thresholds	54	54	N/A	N/A	82	54
Threshold Exceeded?	No	No	No	No	No	No

Source: Rincon 2022

Notes: lbs/day = pounds per day; ROG = reactive organic gases, NO_x = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter or less, PM_{2.5} = particulate matter 2.5 microns or less in diameter

Generation of Toxic Air Contaminants

A site-specific construction Health Risk Assessment (HRA) was conducted by Rincon and is included in this document as Attachment E. The HRA assessed whether pollutant emissions during construction would result in health risks to nearby sensitive receptors based on thresholds established by BAAQMD. Sensitive receptors include children, the elderly, and acutely ill and chronically ill individuals. Sensitive receptor facilities typically include residences, schools, healthcare facilities, and other live-in housing facilities such as assisted living facilities. Based on BAAQMD's thresholds, a significant health risk impact would occur if risks were to exceed 10 cancer cases per 1 million people, thus resulting in an acute or chronic non-cancer Hazard Index (HI) greater than 1.0, or in ambient PM_{2.5} concentrations greater than an annual average of 0.3 microgram per cubic meter.

Construction of the project would emit TACs in the form of diesel particulate matter from heavy-duty vehicles and use of construction equipment during the project's anticipated three-year construction period. Sensitive receptors within 1,000 feet of the project site include a mixed-use residential developments approximately 450 feet west and 850 feet northwest, a skilled nursing facility approximately 720 feet south, and an assisted living apartments approximately 950 feet south of the project site.¹⁴

Results of the HRA are displayed in **Table 4**. The HRA used the highest risk population as the base measure for determining TAC exposure levels from construction activities. The highest risk population was determined to be the skilled nursing facility approximately 720 feet south of the project site. As shown in **Table 4**, TACs generated by construction activities would not exceed the BAAQMD thresholds during the project's three-year construction schedule. Therefore, the project would not have a significant construction health risk impact.

¹⁴ BAAQMD recommends evaluating the potential impacts of TAC emissions on sensitive receptors within 1,000 feet of a project.

Table 4 Health Risks Associated with Construction Activity at Highest Risk Population

Scenario	Excess Cancer Risk(per million)	Chronic Health Risk(per million)	PM2.5 µg/m3annual average
Skilled Nursing Facility	3.28	<0.002	0.009
BAAQMD Significance Threshold	>10	>1	0.3
Threshold Exceeded?	No	No	No

Source: Rincon 2022

µg/m3 = micrograms per cubic meter; BAAQMD = Bay Area Air Quality Management District

Operational Emissions

Operational criteria pollutant emissions would be generated primarily from mobile sources (i.e., vehicle trips). Other sources of emissions include energy use (e.g., natural gas), consumer products, architectural coatings, and landscape equipment. The screening-level sizes for operational criteria air pollutants (CAPs) pertaining to mid-rise apartments are 494 DUs and 346,000 gross-square-foot (gsf), respectively. Because the project includes only 420 DUs, it falls under the screening criteria and no impacts from operational emissions would be expected.

Odors

Typical odor sources are associated with municipal, industrial, or agricultural land uses, such as wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; the wind speed and direction; and the sensitivity of receptors. As a multi-family residential development, the project would not be expected to generate significant odors. Land uses immediately surrounding the project site include commercial and light industrial land uses, which would also not be expected to generate significant odors.

The Millbrae Water Pollution Control Plant and Recology Peninsula Garbage Collection Service, which are potential sources of significant odors, are approximately 0.3 mile north and 0.9 mile east of the project site, respectively. However, these existing facilities have not received any complaints related to odors during operation.¹⁵ Moreover, MERV 13 air filters would be incorporated into project design to protect future residents from both air pollution and odors. Therefore, the potential for odor-related impacts on the residential receptors associated with the project would be low.

¹⁵ Reed, Rochelle. Public Records Section Coordinator. Bay Area Air Quality Management District. June 11, 2019—email to Darrin Trageser, ICF Sacramento, regarding odor complaints received by the air district regarding Recology Peninsula Services.

Reed, Rochelle. Public Records Section Coordinator. Bay Area Air Quality Management District. June 17, 2019—email to Darrin Trageser, ICF Sacramento, regarding odor complaints received by the air district regarding the City of Millbrae Wastewater Treatment Plant.

Water Quality

The project site is within the San Mateo Creek-Frontal San Francisco Bay Estuaries watershed, which drains much of the eastern portion of San Mateo County into San Francisco Bay.¹⁶ The project site is on the Millbrae Creek sub-watershed.¹⁷ San Francisco Bay is approximately 0.6 mile east of the project site. The existing sites consist of paved parking lots, three industrial buildings, and some limited landscaped vegetation.

Stormwater Runoff

Stormwater runoff from the project site would ultimately drain into San Francisco Bay. Currently, the project site includes two surface parking lots and three large buildings; approximately 88 percent of the current project site is composed of impervious surfaces. The project would decrease the amount of impervious surfaces onsite from 88 percent to 80 percent. Therefore, the project would not be expected to substantially increase the rate or amount of surface runoff. In addition, the project would treat 100 percent of stormwater runoff onsite using LID treatment measures, such as diverting roof runoff to vegetated areas.

Because the project would involve construction activities that would disturb more than 1 acre, surface runoff from the project site would be regulated under the NPDES program, which is enforced locally by the San Francisco Bay Area Regional Water Board. Furthermore, the project would be required to develop and implement a Stormwater Pollution Prevention Plan for the site, in compliance with the Construction General Permit. The Stormwater Pollution Prevention Plan must list the BMPs to reduce or eliminate and practices to control site runoff, measures to reduce the risk of spills or leaks that could reach receiving waters, and procedures to address minor spills of hazardous materials.

Stormwater runoff during the operational phase of the project would be subject to the LID measures in Provision C.3 of the NPDES Municipal Regional Permit, under Regional Water Board Order R2-2015-0049. These measures include source control, site design, and treatment requirements to reduce the amount of stormwater runoff and improve the quality of stormwater runoff. The project would treat 100 percent of stormwater runoff onsite using LID treatment measures, such as diverting roof runoff to vegetated areas. After onsite treatment, water would drain through existing storm drain systems along Adrian Road to the east of the project site. Compliance with existing stormwater regulations would ensure that the project would not result in significant impacts on water quality related to stormwater runoff.

Groundwater

Groundwater near the project site was found at depths of 2 to 10 feet below ground surface. If construction occurs during a period with high groundwater levels, temporary dewatering may be required during isolated excavation activities. Furthermore, the Regional Water Board would need to be notified if dewatering were to occur. The contractor may be subject to dewatering requirements in

¹⁶ 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: May, 2022.

¹⁷ City of Burlingame. 2018. Burlingame Watersheds ArcGIS Map Viewer. Available: https://www.burlingame.org/departments/public_works/stormwater_management/burlingame_watersheds.php. Accessed: April, 2022.

addition to those outlined in the Construction General Permit, including discharge sampling and reporting. In addition, all residential units would be constructed above the seasonal-high water table. Prior to receiving a building permit or other construction-related permit, final design would be approved by the Burlingame Department of Public Works. The project would use municipal water from the San Francisco Public Utilities Commission (SFPUC) and would not tap into aquifers or otherwise result in groundwater use during construction or operation. Therefore, no impacts to groundwater would occur.

(e) The site can be adequately served by all required utilities and public services.

The project would be in an urban area that is already served by all necessary municipal utilities (i.e., water, wastewater, stormwater, solid waste) and public services (i.e., fire, police, schools). The city currently has a population of approximately 30,071, which is served by existing utilities and public service providers. The project would include the construction of 420 units and a new parking structure. The project's residential component could induce 1,046 new residents, as calculated using the citywide persons-per-household ratio of 2.49.¹⁸ However, the anticipated population at the project site would be consistent with growth anticipated in the 2040 General Plan. As discussed below, the project would be adequately served by all required utilities and public services.

Water

The City purchases all of its potable water from the regional water system of SFPUC. According to the City's 2020 Urban Water Management Plan (UWMP), the City's average water demand between 2016 and 2020 was a total of 1,221 million gallons (MG) which is equivalent to 3.34 million gallons per day (mgd). Burlingame has an Individual Supply Guarantee (ISG) of 5.23 million gallons per day (MGD), or 1,909 MG per year. Therefore, the City's current demand of 3.34 million gallons is less than is available supply of 5.23 million gallons.

According to the 2020 UWMP, daily residential per capita water use in the city totaled 107 gallons per day (gpd). The daily per capita water use target for 2020 was 135 gpd. Using 135 gpd as a conservative figure, and assuming a conservative onsite population of 1,046 persons, daily water demand would total approximately 141,210 gpd. As explained above, the city uses an average of 3.34 mgd of its 5.23 mgd water supply; therefore, adequate water supplies are available to serve the project, and no expanded or new potable water facilities would be required. No significant impact would occur.

Water demand within the City is projected to increase to 1,721 MG by 2045, a change of 35 percent compared to the water demand of 1,271 MG in 2020. as discussed under **threshold (a)**, the project is consistent with the Burlingame General Plan land use designation and zoning; therefore, water usage associated with the project was adequately evaluated in the Burlingame Urban Water Management Plan, which found that the City would have adequate supply to fill the growing demand.

Wastewater

Burlingame operates and maintains a wastewater collection system that conveys wastewater to the City's wastewater treatment plant (WWTP). Wastewater flows are carried to the WWTP at 1103 Airport Boulevard, which serves the entire city of Burlingame as well as approximately one-third of

¹⁸ U.S. Census Bureau. 2019. Persons Per Household 2013-2017. Available: <https://www.census.gov/quickfacts/fact/table/burlingamecitycalifornia/HSD310220#HSD310217>. Accessed May 2022.

Hillsborough. The WWTP has a treatment capacity of 15 mgd. The average flow of wastewater treated at 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.

Wastewater quantities are generally approximately 95 percent of water-use quantities. As discussed above, project water demand is estimated to be 141,210 gpd; therefore, the project would generate approximately 134,150 gpd of wastewater. Additional wastewater would be generated as part of the development's proposed non-residential uses, though non-residential wastewater is anticipated to be generally minimal. Because the WWTP treats a fraction of its permitted wastewater capacity, adequate wastewater treatment capacity is available. The project would not exceed wastewater treatment requirements, and the impacts would not be significant. Furthermore, the project would be required to comply with General Plan Policy FI-3.6, which ensures that adequate wastewater collection and treatment services for all new development are available before developments are approved.

Solid Waste

The City is within the service area of Rethink Waste, also known as the South Bayside Waste Management Authority. Recology San Mateo County provides recycling, composting, and garbage collection services for residents and businesses in the Rethink Waste service area. Solid waste and recyclables collected in the City are typically sent to the Corinda Los Trancos Landfill (formerly Ox Mountain Landfill) in Half Moon Bay. As of March 2017, the landfill had a remaining capacity of approximately 22 million cubic yards out of a permitted capacity of 60.5 million cubic yards. The Corinda Los Trancos Landfill has an estimated closure date of 2034¹⁹.

Construction of the project would result in demolition waste from parking lot pavement and three buildings. The project would be required to comply with the City of Burlingame Construction and Demolition Recycling Ordinance (Chapter 8.17 of the Municipal Code), which requires salvaging or recycling of at least 60 percent of construction-related solid waste. The project would also generate waste during operation, particularly in the residential building. In 2018, residential uses in the city generated approximately 6.9 pounds per person per day (ppd) of solid waste. Therefore, with a conservative anticipated population of up to 1,046 residents, the project could generate approximately 7,217 ppd (3.60 tons per day) of solid waste in the form of garbage as well as recycling and composting material. The Corinda Los Trancos Landfill is permitted to receive 3,598 tons per day. Solid waste generated by operation of the project would represent approximately 0.1 percent of the permitted capacity of Corinda Los Trancos Landfill. As such, Corinda Los Trancos Landfill would have adequate capacity to serve the project.

Fire Protection Services

The Central County Fire Department (CCFD) provides fire protection services within Burlingame, Millbrae, and Hillsborough. CCFD has 64 highly-trained professional staff members. There are five fire stations in the CCFD's jurisdiction, two of which are in Burlingame. The closest CCFD station to the

¹⁹ San Mateo County Clean Water Program Final Programmatic Environmental Impact Report.2019. Chapter 17 Utilities. Available: https://cleanwaterprogramsanmateo.org/wp-content/uploads/2019/08/Chapter_17_Uilities.pdf. Accessed May 2022.



project is Fire Station No. 37, at 611 Magnolia Avenue in Millbrae, approximately 0.8 mile southeast of the project site.

In accordance with standard City practices, the CCFD would review project plans prior to the issuance of permits to ensure compliance with all applicable fire and building codes. 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) and the design of driveways and access points. 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, resulting in physical impacts. The increase in the number of residents at the project site would be minor compared with the CCFD service population of over 70,000 residents. Therefore, the project would be adequately served by fire services .

Police Protection Services

The Burlingame Police Department (BPD) provides emergency police services in the City. BPD has one police station at 1111 Trousdale Drive. As of 2022, BPD employs 40 full-time sworn police officers (1 Chief, 1 Captain, 2 Lieutenants, 6 Sergeants, and 30 Officers) resulting in a ratio of 1 officers per 750 residents. The 2040 General Plan Community Safety Element does not designate a standard ratio for police officers to residents or a standard emergency response time. However, it does require continued maintenance of optimal police staffing levels, which are necessary to meet community safety needs.

The project site is currently served by the BPD. The addition of up to a maximum of 1,046 residents upon project implementation would not significantly degrade the existing police service ratio. 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, resulting in physical impacts. The increase in the number of residents would be minor compared with the BPD service ratio. Therefore, the project would be adequately served by police services.

Schools

The Burlingame School District (BSD) includes six elementary schools and one intermediate school, with a total enrollment of approximately 3,387 students. Rollins Road is served by Lincoln Elementary School. In addition, Burlingame High School, part of the San Mateo Union High School District (SMUHSD), is located in Burlingame. In total, the SMUHSD serves approximately 9,000 students, and enrollment grows every year.

The project would include 420 new units. BSD uses a student generation rate of 0.2067 students per housing unit for elementary schools and a generation rate of 0.0525 for middle schools. For high schools, the State of California high school student generation rate is 0.2 students per housing unit. Using these student generation rates, 420 new housing units could result in up to 87 elementary school students, 22 middle school students, and 84 high school students. The existing schools would have adequate capacity to serve the project. In addition, the project is subject to Senate Bill 50 school impact fees (established by the Leroy F. Greene School Facilities Act of 1998). Section 65996 of the State Government Code states that the payment of the school impact fees established by Senate Bill 50, which may be required by any state or local agency, is deemed to constitute full and complete mitigation for school impacts from development.

CEQA GUIDELINES SECTION 15300.2 - EXCEPTIONS

This section documents that none of the exceptions in CEQA Guidelines Section 15300.2 (b) through (f) would disqualify the project from being found categorically exempt.²⁰ This section includes a discussion of the consideration of 15300.2 (b) through (f).

(b) Cumulative Impact - All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time, is significant.

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 less-than-significant impacts 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 that the project would be consistent with the 2040 General Plan land use and zoning; given that the project would not have a 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, a cumulatively significant impact would not occur and the exception under CEQA Guidelines Section 15300.2(b) does not apply.

(c) Significant Effect - A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances

There are no known unusual circumstances that would be applicable to the project or the project site that would result in a significant effect on the environment (see also the further discussion under Criterion 15300.2(e) regarding hazardous materials, below). Therefore, the exception under CEQA Guidelines Section 15300.2(c) does not apply to the project.

(d) Scenic Highways - A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR

The project site has no trees, historic buildings, rock outcroppings, or similar visual resources and is not within a highway that has been officially designated as a state scenic highway. The nearest scenic highway, Interstate 280, is approximately 1.6 miles west of the project site and the project site is not visible from that freeway. Therefore, the exception under CEQA Guidelines Section 15300.2(d) does not apply to the project.

(e) Hazardous Waste Sites - A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

The provisions of Government Code Section 65962.5 are commonly referred to as the "Cortese List." The provisions require the Department of Toxic Substance Control, the State Water Resources Control

²⁰ Section 15300.2 (a) relates specifically to location if invoking Categorical Exemption Classes 3, 4, 5, 6, and 11, which are not relevant to the project.

Board, the California Department of Public Health, and the California Department of Resources Recycling and Recovery to submit information pertaining to sites associated with solid waste disposal, hazardous waste disposal, leaking underground tank sites, and/or hazardous materials releases to the Secretary of California Environmental Protection Agency.

The project site is not located on a Cortese List site. The Project site is also not identified on any other lists compiled pursuant to Section 65962.5 of the Government Code; therefore, an exception to the Class 32 exemption under CEQA Guidelines Section 15300.2(e) does not apply.

(f) Historical Resources - Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

The project proposes to demolish all three structures on the project site. The Building at 1855 Rollins Road was built in 1960, the building at 1881 Rollins Road was built in 1958 and remodeled in 1990. The building at 1873 Rollins Road was built in 1964 with a small addition added in 1983. Although all buildings were constructed more than 50 years ago, they are not eligible for listing in the California Register of Historic Resources or the National Register of Historic Places, as the buildings do not meet the criteria for listing.²¹ The buildings are not associated with local or national historical events, and are not associated with the lives of persons important to local or national history. Additionally, the buildings are warehouse buildings that do not have distinct architectural features that are common for a period, region or method of construction, or famous artist. Furthermore, the buildings have not yielded and will not likely yield information of importance to local and national prehistory and history. Thus, the project would not cause substantial adverse change to a significant historic resource.

SUMMARY OF FINDINGS

As documented above, the project falls within the description of a Class 32 Infill Development Exemption(s). None of the exceptions noted in CEQA Guidelines Section 15300.2 would be triggered. The proposed improvements and construction activities are limited to the project site and would have no offsite or considerable cumulative effects. Given this, additional analysis is not warranted.

CONCLUSION

The project has been reviewed in compliance with CEQA. Pursuant to CEQA Guidelines Section 15300.2, the project is categorically exempt from CEQA as Class 32 Infill Development.

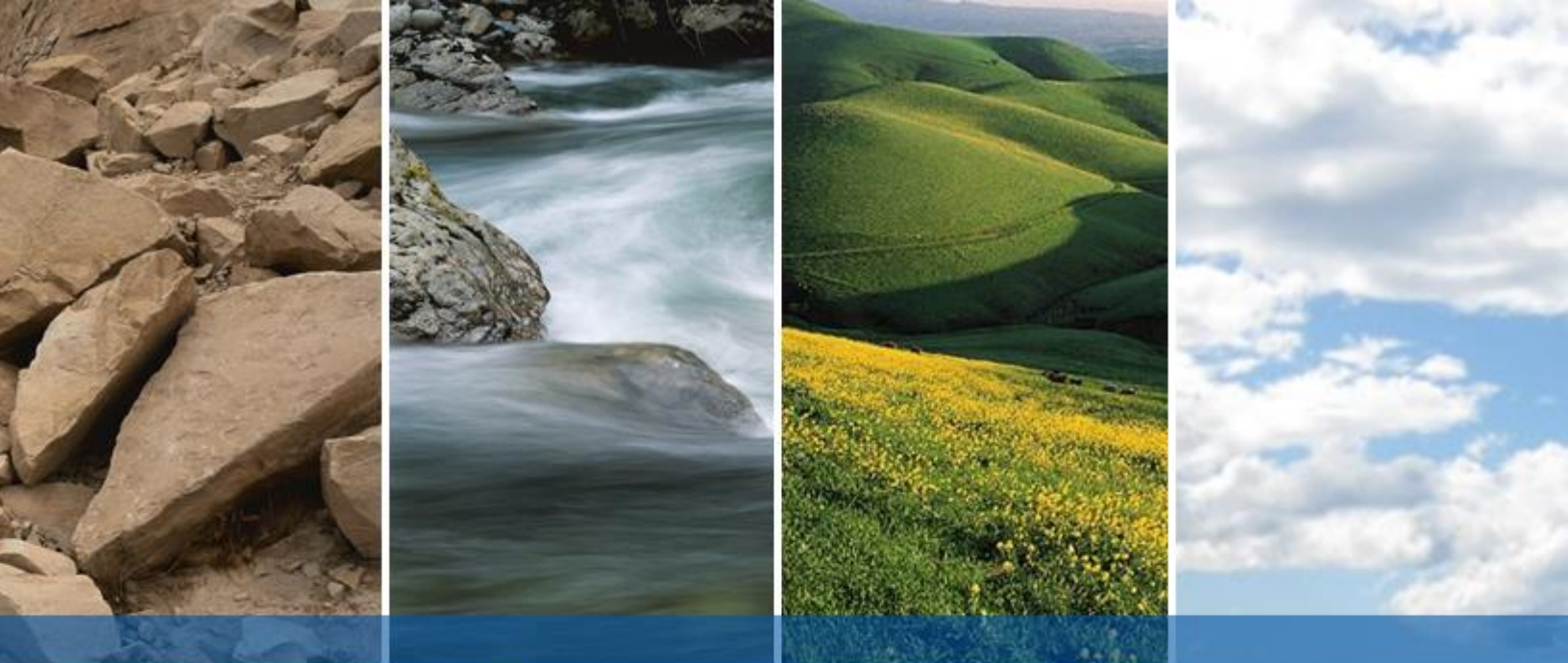
Attached *Attachment A: Phase I Environmental Site Assessment*
 Attachment B: Phase II Environmental Site Assessment
 Attachment C: Draft Transportation Impact Study for the 1855-1881 Rollins Road Project
 Attachment D: 1855-1881 Rollins Road Residential Project Construction Air Quality Emissions Letter Report

²¹ Office of Historic Preservation. Department of Parks and Recreation. 2006. *California Register of Historical Resources: Questions and Answers*. Available: http://www.parks.ca.gov/pages/1069/files/03ca%20regg&a_090606.pdf. Accessed June 2022.



Attachment E: 1885-1881 Rollins Road Residential Development Project Health Risk Assessment

Attachment A: Phase I Environmental Site Assessment



1845-1885 N. ROLLINS ROAD
BURLINGAME, CALIFORNIA

PHASE I ENVIRONMENTAL SITE ASSESSMENT

SUBMITTED TO

Ms. Kristen Gates
Hanover R.S. Limited Partnership
1780 South Post Oak Lane
Houston, TX 77056

PREPARED BY
ENGEO Incorporated

August 11, 2021

PROJECT NO.
19122.000.001

Project No.
19122.000.001

August 11, 2021

Ms. Kristen Gates
Hanover R.S. Limited Partnership
1780 South Post Oak Lane
Houston, TX 77056

Subject: 1845-1885 N. Rollins Road
Burlingame, California

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Dear Ms. Gates:

ENGEO is pleased to present our phase I environmental site assessment of the subject property (Property), located in Burlingame, California. The attached report includes a description of the site assessment activities, along with ENGEO's findings, opinions, and conclusions regarding the Property.

ENGEO has the specific qualifications based on education, training, and experience to assess the nature, history, and setting of the Property, and has developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312 and the American Standard Testing Method (ASTM) Practice E1527-13. We declare that, to the best of our professional knowledge and belief, the responsible charge for this study meets the definition of Environmental Professional as defined in Section 312.10 of 40 CFR Part 312 and ASTM E1527-13.

We are pleased to be of service to you on this project. If you have any questions concerning the contents of our report, please contact us.

Sincerely,

ENGEO Incorporated



Cody Johnson, GIT



Jeffrey A. Adams, PhD, PE

cj/jaa/dt

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APPENDIX F – Environmental Data Resources, Inc., City Directory

APPENDIX G – Environmental Site Assessment Questionnaires (3)

APPENDIX H – Qualifications of Environmental Professional

EXECUTIVE SUMMARY

ENGEO conducted a phase I environmental site assessment for the property located at 1845 - 1885 N. Rollins Road in Burlingame, California (Property). The Property is approximately 5.2-acres in area and is identified by Assessor's Parcel Numbers (APN) 025-166-230 and 025-166-240.

The Property consists of three warehouse structures, an office structure, paved parking lots, landscaping and an out-of-service railroad spur. The four structures are currently occupied by a moving company, a physical therapist, and basketball training facility. Review of historical records indicates that the Property has been occupied by multiple warehouse structures since at least 1963.

This assessment included a review of local, state, tribal, and federal environmental record sources, standard historical sources, aerial photographs, fire insurance maps and physical setting sources. A reconnaissance of the Property was conducted to review site use and current conditions to check for the storage, use, production or disposal of hazardous or potentially hazardous materials and interviews with persons knowledgeable about current and past site use.

The site reconnaissance and records review did find documentation or physical evidence of soil or groundwater impairments associated with the use or past use of the Property. A review of regulatory databases maintained by county, state, tribal, and federal agencies found no documentation of hazardous materials violations or discharge on the Property and did identify contaminated facilities within the appropriate American Society for Testing and Materials (ASTM) search distances that would reasonably be expected to impact the Property.

Based on the findings of this assessment, no Recognized Environmental Conditions (RECs), no historical RECs, and no controlled RECs were identified for the Property.

ENGEO has performed a phase I environmental site assessment in general conformance with the scope and limitations of ASTM E1527-13 and the standards and practices of the All Appropriate Inquiry – Final Rule (40 Code of Federal Regulations Part 312).

It is our opinion that the findings of this study are based on a sufficient level of information obtained during our contracted scope of services to render a conclusion as to whether additional appropriate investigation is required to identify the presence or likely presence of a REC. The following data gaps were identified.

- A response to our records request was not received at the time of publication from the following agencies; Burlingame City Clerk, Central County Fire Department, San Mateo Consolidated Fire Department and San Mateo County Fire Department.

The data gaps identified during this process do not affect the conclusions as to the presence or lack of presence of RECs at the Property.

This assessment has revealed no evidence of RECs in connection with the Property. In connection with the future redevelopment of the Property, ENGEO recommends the following.

- Soil sampling along the out-of-service railroad spur.
- Removal of a small closed-in-place UST located to the south of the basketball facility.

1.0 INTRODUCTION

1.1 PURPOSE OF PHASE I ENVIRONMENTAL SITE ASSESSMENT

This assessment was performed at the request of Hanover R.S. Limited Partnership for the purpose of environmental due diligence during property acquisition. The objective of this phase I environmental site assessment is to identify Recognized Environmental Conditions (RECs) associated with the Property. As defined in the ASTM Standard Practice E1527-13, an REC is “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.”

1.2 DETAILED SCOPE OF SERVICES

The scope of services performed included the following:

- A review of previous environmental reports prepared for the Property.
- A review of publicly available and practicably reviewable standard local, state, tribal, and federal environmental record sources.
- A review of publicly available and practicably reviewable standard historical sources, aerial photographs, fire insurance maps and physical setting sources.
- A reconnaissance of the Property to review site use and current conditions. The reconnaissance was conducted to check for the storage, use, production or disposal of hazardous or potentially hazardous materials.
- Written/oral interviews with owners/occupants and public sector officials.
- Preparation of this report with our findings, opinions, and conclusions.

1.3 SITE LOCATION AND DESCRIPTION

The Property is located at 1845-1885 N. Rollins Road in Burlingame California (Figures 1 and 2). The approximately 5.3-acre Property is identified as APNs 025-166-230 and 025-166-240 (Figure 3) and is currently occupied by three warehouse structures, an office building, an out-of-service railroad spur, and associated parking and landscaping.

1.4 CURRENT USE OF PROPERTY AND ADJOINING PROPERTIES

The warehouse building associated with 1881 N. Rollins Road is currently being utilized as a storage facility by a moving company. The rear portion of the building is utilized by a physical therapy center. A small studio with equipment and a separate building with a basketball court is present at the rear of the Property.

The warehouse at 1855 N. Rollins Road is currently unoccupied and under minor plumbing maintenance.

1.5 SITE AND VICINITY CHARACTERISTICS

According to published topographic maps, the Property ranges in elevation from approximately 1 foot above mean sea level (msl) in the east to approximately 6 feet above msl to the west. Review of the Geologic Map of the San Francisco-San Jose Quadrangle (Wagner et al., 1991) found that the Property is underlain by artificial fill.

Geocheck – Physical Setting Source Summary of the Environmental Data Resources, Inc. (EDR) report (Appendix A) indicated no Federal United States Geological Survey (USGS) and 173 State wells located within 1 mile of the Property. Well Number MW-16 is mapped approximately 50 feet west of the Property, and six groundwater level measurements are reported for this well. Groundwater in the vicinity of Property was observed between 2 feet and 10 feet below the ground surface.

We reviewed EnviroStor, a website maintained by the State of California Department of Toxic Substances Control (DTSC), and GeoTracker, a website maintained by the State of California Water Resources Control Board (SWRCB), for nearby facilities with records that include depth-to-groundwater measurements. The following information was obtained regarding local groundwater conditions.

TABLE 1.5-1: Local Groundwater Conditions

WELL ID	PROXIMITY TO PROPERTY	REPORTED DEPTH TO GROUNDWATER
MW-1	350 feet north	5 feet
MW-2	400 feet north	2.8 feet
MW-3	350 feet north	2.7 feet
MW-4	300 feet north	2.3 feet
MW-5	350 feet north	4.5 feet
MW-16	50 feet west	8 to 10 feet
MW-17	100 feet southwest	7 to 8 feet

The site-specific depth to groundwater and direction of groundwater flow was not determined as part of this assessment. Fluctuations in groundwater levels may occur seasonally and over a period of years due to variations in precipitation, temperature, irrigation and other factors.

We reviewed the Department of Conservation, Geologic Energy Management (CalGEM), formerly the Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR), website and map database to determine if any historic oil and/or gas wells were located within the Property. No wells were mapped within 1 mile of the Property.

2.0 PREVIOUS ENVIRONMENTAL REPORTS

SCS Engineers; Preliminary Site Assessment, 1881 Rollins Road, Burlingame, California, File No. 0389075.00, March 30, 1990.

SCS Engineers performed a preliminary site assessment at 1881 Rollins Road in March 1990. The assessment included a site reconnaissance, records search, and a review of fuel leak investigation within a 1-mile radius of the Property. No underground tanks or evidence of contamination were noted at the time of reconnaissance. Records indicating the removal of an

underground storage tank (UST) was obtained from the local Burlingame Fire Department. SCS noted that they did not believe contamination from this tank occurred or that the tank was removed improperly. SCS did not find records of contamination and recommended no further studies at the time of publication.

SCS Engineers; Addendum to Preliminary Site Assessment and Request for Further Characterization, 1873-1881 Rollins Road, Burlingame, California, File No. 0390058.01, February 7, 1991.

SCS performed an additional site reconnaissance and soil sampling from the perimeter of an abandoned 1,000-gallon UST located at Building C, and testing of building tiles for asbestos. The UST was abandoned by means of concrete slurry under the supervision of the Burlingame Fire Department on February 9, 1984. Three soil borings were performed at the perimeter of the abandoned UST and soil samples collected at depths of 5 to 6½ feet and 10 to 11½ feet. Concentrations of fuel compounds within the soil samples were all below current USEPA, California State Water Resources Control Board (SWRCB), and Department of Toxic Substances Control (DTSC) applicable screening levels. Acoustical ceiling tiles were collected from buildings A and B that were believed to contain asbestos. All samples were found to be non-asbestos containing materials.

3.0 RECORDS REVIEW

3.1 PROPERTY RECORDS

3.1.1 Title Report/Ownership

The Title Report lists recorded land title detail, ownership fees, leases, land contracts, easements, liens, deficiencies, and other encumbrances attached to or recorded against a subject property. Laws and regulations pertaining to land trusts vary from state to state and the detail of information presented in a Title Report can vary greatly by jurisdiction. As a result, ENGEO utilizes a Title Report, when provided to us, as a supplement to other historical record sources.

Two Preliminary Title Reports for the Property, prepared by First American Title Insurance Company and dated April 1, 2021 and June 29, 2021, respectively, were provided for our review. The Property title for 1181-1185 North Rollins Road is vested in S.J. Amoroso Properties Co., a corporation. The Property title for 1855 North Rollins Road is vested in E&S Property, LLC, a California limited liability company, as to an undivided 50% interest and ANRM Holdings LLC, a California limited liability company, as to an undivided 50% interest, as tenants-in-common. No references to environmental liens, deed restrictions or other potential environmental issues were noted. These reports are included in Appendix B.

3.2 HISTORICAL RECORD SOURCES

The purpose of the historical record review is to develop a history of the previous uses or occupancies of the Property and surrounding area in order to identify those uses or occupancies that are likely to have led to RECs on the Property.

3.2.1 Historical Topographic Maps/Aerial Photographs/Sanborn Maps

Historical USGS topographic maps, aerial photographs, and Sanborn Fire insurance maps were reviewed to determine if discernible changes pertaining to the Property had been recorded. EDR provided the following maps and photographs, presented in Appendices C, D, and E.

TABLE 3.2.1-1: Historical Review Summary

HISTORIC MAP/PHOTOGRAPH	YEARS
Topographic Maps	1896, 1899, 1915, 1939, 1947, 1949, 1956, 1968, 1973, 1980, 1997, 2012
Aerial Photographs	1943, 1946, 1956, 1963, 1968, 1974, 1982, 1993, 1998, 2006, 2009, 2012, 2016
Sanborn Maps	1959, 1961, 1970

In 1896, the Property is depicted as relatively flat tidal marshland of the San Francisco Bay. By 1939, the Property and surrounding properties are flat and comprised of reclaimed land. The Property is vacant land, and a stream channel is depicted intersecting the western portion. A railroad is visible in its current alignment to the west. Railroad tracks are visible traversing the Property in 1956. The drainage channel to the north, Rollins Road to the east and Broderick Street to the south are in their current alignments. A warehouse, office building, and construction storage yard are depicted at 1881 Rollins Road in the 1959 Sanborn map. By 1963, the warehouse at 1845 Rollins Road had been constructed, and a second warehouse at 1881 Rollins had been constructed by 1968. Surrounding properties primarily consist of commercial warehouses. Property conditions in 2016 remain similar to those visible on earlier photographs.

3.2.2 City Directory

City Directories, published since the 18th century for major towns and cities, list the name of the resident or business associated with each address. A city directory search conducted by EDR is located in Appendix F.

TABLE 3.2.2-1: City Directory

YEAR	LISTINGS
2017	F & M PROPERTIES SCIS AIR SECURITY AMERICAN MODERN TILE AMS RELOCATION INC BEKINS
2014	F & M PROPERTIES SKYCHEFS USTOREIT AMS RELOCATION INC BEKINS
2010	SAN FRANCISCO SVC BASE SKYCHEFS F & M PROPERTY USTOREIT AMS RELOCATION INC BEKINS MOVING & STORAGE CAYTON RESOURCES NOTHING BUT HOOPS

YEAR	LISTINGS
2005	R P S INC U STOR IT AMS BEKINS AMS RELOCATION INC
2000	U STOR IT A M S RELOCATION INCORPORATED AMS RELOCATION INCORPORATED BEKINS AGENT BEKINS MOVING & STORAGE AGENT HAYES, JAMES D AVANTIS ITALIAN SANDWICH SHOP & CATERING
1995	E FOMIL & SONS U STOR IT ACME MOVING & STORAGE AMS RELOCATION INC BEKINS AGENT FULLER VAN & STORAGE AVANTIS ITALIAN SANDWICH SHOP
1992	FOMIL E&SONS U STOR IT BEKINS AGENT FULLER VAN&STORAGE AVANTIS SANDWICH SH
1986	FOMIL E&SONS U STOR IT MUELER BRASS CO BARKER INDS&FOUNDRY BAY AR PARCEL SERV ITALIAN SNDWCH SHOP
1981	REGIONAL OCCUPATNL SMTO CO VO ED OCCPT U STOR IT MUELER BRASS CO BACKALLEY DELI BARKER INDS&FOUNDRY WHEELABRATOR FRYE
1976	COUNTY REGIONAL OCCUPATIONAL PROGRAM 692-2900 U STOR IT (WHSE) 697-1146 MUELER BRASS CO PLMB SUPS 697-9383 BACK ALLEY DELICATESSEN LUNCH SOUP SALADS 697-4005 GRANDEY ROY PRODUCTIONS INDUSTRIAL MOTION PICTURES 692-0500 LAWREN PRODUCTIONS INC MOTION PICTURES PRODUCERS 6974-2558 BARKER INDUSTRIAL & FOUNDRY SUPPLY 697-8865 WHEELBRATOR FRYE INC MATERIAL CLEANING DIV 697-7893
1973	COUNTY REGIONAL OCCUPATIONAL PROGRAM 692-2900 CONSOLIDATED BEVERAGE CO (WHSE) MUELER BRASS CO PLMB SUPS 697-9383 LAWREN PRODUCTIONS INC FILM PRODUCTIONS WHEELBRATOR FRYE INC ABRASIVES SLS 697-7893 PETRONAVE L A & ASSOCIATES INC MFRS AGTS 697-0933 LINXWILER OAKLEY & RYAN INC MFRS AGTS 697-7453 GRANDEY ROY PRODUCTIONS INDUSTRIAL MOTION PICTURES 692-0500 LAWREN PRODUCTIONS INC MOTION PICTURES PRODUCERS 6974-2558 BARKER INDUSTRIAL & FOUNDRY SUPPLY 697-8865

YEAR	LISTINGS
1970	BASFORD H R CO CARPETS-WHOL 692-1950 MUELER BRASS CO PLMB SUPS 697-9383 PETRONAVE L A & ASSOCIATES INC MFRS AGTS 697-0933 LINXWILER OAKLEY & RYAN INC MFRS AGTS 697-7453 GRANDEY ROY PRODUCTIONS INDUSTRIAL MOTION PICTURES 692-0500 LAWREN PRODUCTIONS INC MOTION PICTURES PRODUCERS 6974-2558 BARKER INDUSTRIAL & FOUNDRY SUPPLY 697-8865
1967	HEATH D C & CO TEXTBOOK DISTR 692-3722 MUELLER BRASS CO PLMB SUPS 697-9383 GRANDEY ROY PRODUCTIONS INDUSTRIAL FILM PRODUCERS 692-0500 PETRONAVE L A & ASSOCAITES MFRS AGTS 697-0933 LINXWILER M E CO MFRS AGTS 697-7453 MANLEY BROS COATED SAND 692-0917 BARKER INDUSTRIAL & FOUNDRY SUPPLY 697-8865
1963	HARCOURT BRACE & WORLD INC PUBLS 697-8501 BAKER IND & FNDRY SUP 697-8865 LARSEN & LARSEN INC GENL CONTRS 697-1200 PETRONAVE L A & ASSOC MFR AGTS 697-5320 LINWILER M E & CO MFR AGTS 697-7453

3.3 ENVIRONMENTAL RECORD SOURCES

EDR performed a search of federal, tribal, state, and local databases regarding the Property and nearby properties. Details regarding the databases searched by EDR are provided in Appendix A. A list of the facilities documented by EDR within the approximate minimum search distance of the Property is provided below.

3.3.1 Environmental Records

3.3.1.1 Subject Property

The Property is listed on the CA HAZNET and CA HWTS Environmental Record source databases.

F&M Properties (Property) – In 1997, approximately 12.642 tons of asbestos-containing waste was off-hauled and disposed of at a landfill from the building located at 1845-1855 Rollins Road. The Property owner representative, Mr. Alejandro Modena, indicated that this waste was generated during a renovation of the building.

3.3.1.2 Other Properties

The following databases include facilities listed within the appropriate ASTM search distances of the Property on Environmental Records sources.

TABLE 3.3.1.2-1: Environmental Database Listings for Nearby Properties

DATABASE	NUMBER OF SITES
SEMS-ARCHIVE	1
RCRA-LQG	3
RCRA-SQG	9
RCRA-VSQG	1

DATABASE	NUMBER OF SITES
CA ENVIROSTOR	10
CA LUST	48
CA CPS-SLIC	8
CA UST	9
CA AST	2
CA VCP	1
CA BROWNFIELDS	2
CA SCH	1
CA CERS HAZ WASTE	16
CA SWEEPS UST	14
CA HIST UST	19
CA CERS TANKS	4
CA FID UST	11
RCRA NonGen / NLR	49
CA San Mateo Co. BI	155
CA Cortese	27
CA DRYCLEANERS	1
CA HAZNET	1
CA HIST CORTESE	21
TX Ind. Haz Waste	1
CA Notify 65	3
CA HWTS	1

Devincenzi Metal Products (300 feet northeast) – A UST was identified at this off-site location. Soil borings were performed and groundwater monitoring wells were installed. Fuel-related compounds were below applicable screening levels in both the soil and groundwater. The groundwater wells were properly abandoned per San Mateo County Health Services Agency requirements. The case was closed as of May 23, 2006.

Unocal Station #3798 (500 feet west-southwest) – A 550-gallon waste oil tank was excavated and removed from the site in 1989. Soil samples were collected from the sidewalls and tested for fuel compounds. Fuel compounds were detected in the soil and groundwater monitoring wells were installed to determine if groundwater had been affected. A contamination plume of fuel compounds was identified with a maximum benzene concentration of 19,000 micrograms per liter (µg/L) and total petroleum hydrocarbons as gasoline concentration of 270,000 µg/L. A combination of dual-phase extraction and soil vapor extraction methods have been used, and concentrations of fuel compounds have been decreasing each quarterly groundwater monitoring event. Groundwater monitoring wells MW-16 and MW-17 border the Property to the west, and all fuel compounds have been reported below applicable residential screening levels.

Based on the distances to the identified database sites, regional topographic gradient, and the EDR findings, it is unlikely that the above-stated database sites pose an environmental risk to the Property. Multiple properties appear on the “Orphan Summary” list within the ASTM recommended radius search criteria, but would not be expected to impact the Property.

3.4 REGULATORY AGENCY FILES AND RECORDS

The following agencies were contacted pertaining to possible past development and/or activity at the Property.

TABLE 3.4-1: Regulatory Agency Records

NAME OF AGENCY	RECORDS REVIEWED
Burlingame City Clerk	We contacted the Burlingame City Clerk with a file review request, but we have not received a response prior to the publication of this report.
Central County Fire Department	We contacted the Central County Fire Department with a file review request, but we have not received a response prior to the publication of this report.
San Mateo County Environmental Health Services	The San Mateo County Environmental Health Services was contacted and responded that they have no records on file for the Property.
San Mateo Consolidated Fire Department	We contacted the San Mateo Consolidated Fire Department with a file review request, but we have not received a response prior to the publication of this report.
San Mateo County Fire Department	We contacted the San Mateo County Fire Department with a file review request, but we have not received a response prior to the publication of this report.
San Mateo County Assessor's Office	We reviewed the San Mateo County GIS portal and confirmed the APN associated with the Property.
California State Water Resources Control Board	We reviewed the State Water Resources Control Board's (SWRCB's) GeoTracker website. The Property was not identified on the database. Multiple sites are listed within 1 mile of the Property and would not be expected to impact the Property.
Department of Toxic Substances Control	We reviewed the Department of Toxic Substances Control's (DTSC's) EnviroStor website. The Property was not identified on the database. Multiple sites are listed within 1 mile of the Property and would not be expected to impact the Property.

3.5 INDOOR AIR QUALITY

An evaluation of indoor air quality, mold, or radon was not included as part of the contracted scope of services. The California Department of Public Health has conducted studies of radon risks throughout the state, sorted by zip code. Results of the studies indicate that 88 tests were conducted within the Property zip code, with two tests exceeding the current EPA action level of 4 picocuries per liter (pCi/L)¹.

In accordance with ASTM E2600-15 (Tier 1) (*Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*); there are numerous potential petroleum hydrocarbon sources within 1/10 mile of the Property and volatile organic compound (VOC) sources within 1/3 mile of the Property. Based on the distances to the identified database sites,

¹ California Department of Public Health – Radon Program—
(<https://www.cdph.ca.gov/Programs/CEH/DRSEM/CDPH%20Document%20Library/EMB/Radon/Radon%20Test%20Results.pdf>).

regional topographic gradient, and the EDR findings, it is unlikely that the above-stated database sites pose an environmental risk to the Property.

4.0 SITE RECONNAISSANCE

4.1 METHODOLOGY

ENGEO conducted a reconnaissance of the Property on July 23 and July 29, 2021. The reconnaissance were performed by Aryan Noroozi, a Staff Engineer of ENGEO, and Stephen Fallon, a Project Engineer of ENGEO. The Property was viewed for hazardous materials storage, superficial staining or discoloration, debris, stressed vegetation, or other conditions that may be indicative of potential sources of soil or groundwater contamination. The Property was also checked for evidence of fill/ventilation pipes, ground subsidence, or other evidence of existing or preexisting underground storage tanks. Photographs taken during the site reconnaissance are presented in Figure 4.

4.2 EXTERIOR OBSERVATIONS

The following table summarizes our observations during the reconnaissance.

TABLE 4.2-1: Exterior Site Observations

FEATURE TYPE	OBSERVATIONS
Structures	Three warehouse structures and an office structure were observed during the site reconnaissance. The structures are being utilized by a construction supply company, food supply company, moving company, and for recreation basketball.
Hazardous Substances and Petroleum Products in Connection with Identified Uses	No hazardous substances or petroleum products were observed within the Property during the site reconnaissance.
Storage Tanks (underground and above-ground)	An UST was previously abandoned in-place at the southern perimeter of the basketball facility, shown in Figure 3.
Odors	No odors indicative of hazardous materials or petroleum material impacts were noted at the time of the reconnaissance.
Pools of Potentially Hazardous Liquid	Several paint canisters were observed within the Property at 1855 N. Rollins Road during our reconnaissance.
Drums	One drum was observed at 1855 N. Rollins Road, near the western boundary, in the parking area at the time of the reconnaissance.
Polychlorinated Biphenyls (PCBs) Containing Equipment	No potential PCB-containing equipment, including transformers, were observed within the Property during our site reconnaissance.
Hazardous Substances and Petroleum Product Containers	No hazardous substance or petroleum product containers were observed on the Property at the time of our reconnaissance.
Pits, Ponds, and Lagoons	No pits, ponds, or lagoons were observed within the Property at the time of our reconnaissance.
Stained Soil/Pavement	Several areas of stained pavement were observed at 1855 N. Rollins Road, near the western and southern boundary, in the parking and loading area at the time of our reconnaissance.
Stressed Vegetation	No signs of stressed vegetation were observed on the Property at the time of our reconnaissance.
Solid Waste/Debris	No disposal of solid waste was observed at the Property.

FEATURE TYPE	OBSERVATIONS
Stockpiles/Fill Material	Several stockpiles of construction supplies were observed on the Property at 1855 N. Rollins Road during the reconnaissance.
Wastewater	No wastewater conveyance systems were observed at the Property during the reconnaissance.
Wells	No wells were found within the Property during our site reconnaissance. A municipal water system services the Property.
Septic Systems	No septic systems were found within the Property during our site reconnaissance. A municipal sewer system services the Property.

4.3 INTERIOR OBSERVATIONS

The warehouse building at 1855 N. Rollins Road consists of a main office, several small rooms, an outdoor break room, several restrooms, showroom, two walk-in freezers, and a mezzanine level with two small rooms.

4.4 ASBESTOS, LEAD, AND PCB-CONTAINING MATERIALS

An asbestos, lead, and PCB-containing building material survey was not conducted as part of this assessment. Given the age of the existing structures, it is conceivable that asbestos, lead, and PCB-containing materials may exist within the structures.

5.0 INTERVIEWS

Ms. Kristen Gates of Hanover R.S. Limited Partnership completed a Client-based environmental site questionnaire pertaining to applicable environmental information regarding the Property. In the questionnaire, Ms. Gates did not identify potentially environmentally related issues with the Property. Ms. Gates has indicated that the purchase price of the Property is reflective of fair market value of the Property. The questionnaire is presented in their entirety in Appendix G.

Mr. Alejandro Modena and Mr. Gilbert Amoroso completed Key Site Manager-based environmental site questionnaires pertaining to applicable environmental information regarding the Property. Mr. Modena and Mr. Amoroso are unaware of commonly known, reasonably ascertainable, or specialized knowledge indicative of releases or threatened releases that is material to the potential presence of RECs. Mr. Amoroso referenced the 1991 preliminary site assessment conducted by SCS Engineers, which is reviewed in Section 2.0 of this report. Mr. Modena noted that the warehouse at 1855 Rollins Road was utilized as a U-Stor-It facility for approximately 30 years. The questionnaires are presented in their entirety in Appendix G.

6.0 FINDINGS AND CONCLUSIONS

This assessment included a review of local, state, tribal, and federal environmental record sources, standard historical sources, aerial photographs, fire insurance maps and physical setting sources. A reconnaissance of the Property was completed to review site use and current conditions to check for the storage, use, production, or disposal of hazardous or potentially hazardous materials and to conduct written/oral interviews with persons knowledgeable about current and past site use.

The site reconnaissance and records review did not find documentation or physical evidence of soil or groundwater impairments associated with the use or past use of the Property. A review of regulatory databases maintained by county, state, tribal, and federal agencies found no documentation of hazardous materials violations or discharge on the Property and did not identify contaminated facilities within the appropriate American Society for Testing and Materials (ASTM) search distances that would reasonably be expected to impact the Property.

Based on the findings of this assessment, no RECs, no historical RECs, and no controlled RECs were identified for the Property.

ENGEO has performed a phase I environmental site assessment in general conformance with the scope and limitations of ASTM E1527-13 and the standards and practices of the All Appropriate Inquiry – Final Rule (40 Code of Federal Regulations Part 312).

The data gaps identified during this process, if any, do not affect the conclusions as to the presence or lack of presence of RECs at the Property.

This assessment has revealed no evidence of RECs in connection with the Property. In connection with the future redevelopment of the Property, ENGEO recommends the following.

- Soil sampling along the out-of-service railroad spur.

Removal of a small closed-in-place UST located to the south of the basketball facility

7.0 LIMITATIONS

7.1 SIGNIFICANT ASSUMPTIONS OR DEVIATIONS FROM ASTM STANDARD PRACTICE

No significant assumptions or deviations from the ASTM Standard Practice have been identified.

7.2 OPINIONS AND DATA GAPS

It is our opinion that the findings of this study are based on a sufficient level of information obtained during our contracted scope of services to render a conclusion as to whether additional appropriate investigation is required to identify the presence or likely presence of a REC. The following data gaps were identified.

- A response to our records request was not received at the time of publication from the following agencies; Burlingame City Clerk, Central County Fire Department, San Mateo Consolidated Fire Department and San Mateo County Fire Department.

The data gaps identified during this process do not affect the conclusions as to the presence or lack of presence of RECs at the Property.

7.3 LIMITATIONS AND EXCEPTIONS OF ASSESSMENT

The professional staff at ENGEO strives to perform its services in a proper and professional manner with reasonable care and competence but is not infallible. The recommendations and conclusions presented in this report were based on the findings of our study, which were

developed solely from the contracted services. The findings of the report are based in part on contracted database research, out-of-house reports, and personal communications. The opinions formed by ENGEO are based on the assumed accuracy of the relied upon data in conjunction with our relevant professional experience related to such data interpretation. ENGEO assumes no liability for the validity of the materials relied upon in the preparation of this report.

This document must not be subject to unauthorized reuse; that is, reuse without written authorization of ENGEO. Such authorization is essential because it requires ENGEO to evaluate the document's applicability given new circumstances, not the least of which is passage of time. The findings from a phase I environmental site assessment are valid for one year after completion of the report. Updates of portions of the assessment may be necessary after a period of 180 days after completion.

This phase I environmental site assessment is not intended to represent a complete soil, soil gas, or groundwater characterization, nor define the depth or extent of soil, soil gas, or groundwater contamination. It is intended to provide an evaluation of potential environmental concerns associated with the use of the Property. A more extensive assessment that would include a subsurface exploration with laboratory testing of soil, soil gas, and groundwater samples could provide more definitive information concerning site-specific conditions. If additional assessment activities are considered for the Property and if other entities are retained to provide such services, ENGEO cannot be held responsible for any and all claims arising from or resulting from the performance of such services by other persons or entities. ENGEO can also not be held responsible from any and all claims arising or resulting from clarifications, adjustments, modifications, discrepancies or other changes necessary to reflect changed field or other conditions.

7.4 SPECIAL TERMS AND CONDITIONS

ENGEO has prepared this report for the exclusive use of our client, Hanover R.S. Limited Partnership. It is recognized and agreed that ENGEO has assumed responsibility only for undertaking the study for the Client. The responsibility for disclosures or reports to a third party and for remedial or mitigative action shall be solely that of the Client.

Laboratory testing of soil, soil gas, or groundwater samples was not within the scope of the contracted services. The assessment did not include an asbestos survey, an evaluation of lead-based paint, an inspection of light ballasts for polychlorinated biphenyls (PCBs), or a mold survey. A radon evaluation was not performed.

This report is based upon field and other conditions discovered at the time of preparation of ENGEO's assessment. Visual observations referenced in this report are intended only to represent conditions at the time of the reconnaissance. ENGEO would not be aware of site contamination, such as dumping and/or accidental spillage, that occurred subsequent to the reconnaissance conducted by ENGEO personnel.

SELECTED REFERENCES

California Department of Water Resources (<http://www.water.ca.gov/waterdatalibrary/>)

California Department of Public Health – Radon Program–
(<https://www.cdph.ca.gov/Programs/CEH/DRSEM/CDPH%20Document%20Library/EMB/Radon/Radon%20Test%20Results.pdf>).

California Geologic Energy Management Division (CalGEM)
(<https://www.conservation.ca.gov/calgem>)

CalGEM Well Finder
(<https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.94276/37.12009/6>)

Google Maps (<http://maps.google.com>)

SCS Engineers; Preliminary Site Assessment, 1881 Rollins Road, Burlingame, California, File No. 0389075.00, March 30, 1990.

SCS Engineers; Addendum to Preliminary Site Assessment and Request for Further Characterization, 1873-1881 Rollins Road, Burlingame, California, File No. 0390058.01, February 7, 1991.

Wagner D.L., Bortugno E.J., and. McJunkin R.D, 1991, *Geologic Map of the San Francisco-San Jose Quadrangle, California*, 1:250,000.



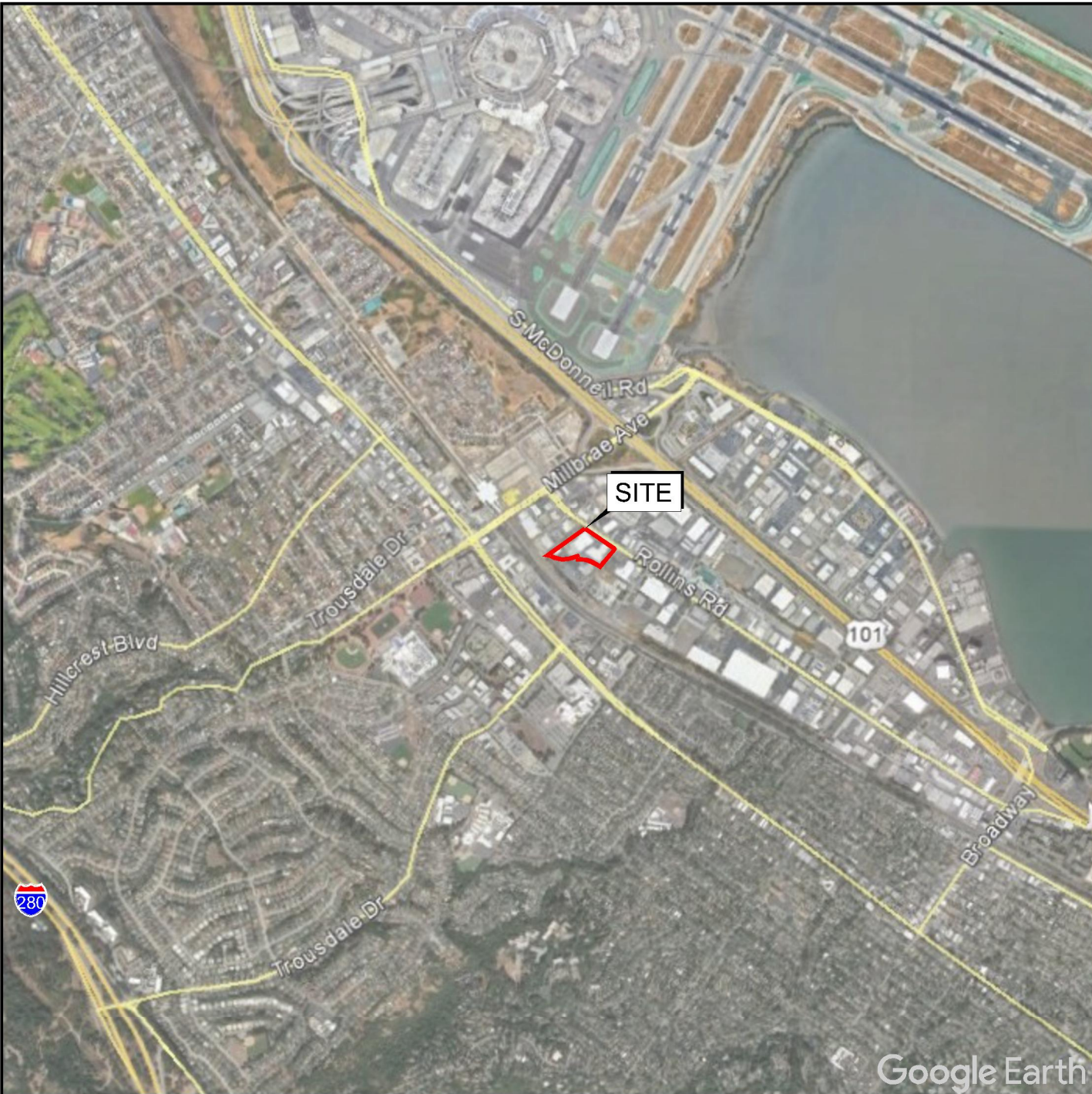
FIGURES

FIGURE 1: Vicinity Map

FIGURE 2: Site Plan

FIGURE 3: Assessor's Parcel Map

FIGURE 4: Site Photographs



BASE MAP SOURCE: GOOGLE EARTH MAPPING SERVICE



VICINITY MAP
1845-1885 N ROLLINS ROAD
BURLINGAME, CALIFORNIA

PROJECT NO.: 19122.000.001

SCALE: AS SHOWN

DRAWN BY: BU

CHECKED BY: SPM

FIGURE NO.

1

ORIGINAL FIGURE PRINTED IN COLOR



0 150
FEET

BASE MAP SOURCE: GOOGLE MAPPING SERVICE AND BDE ARCHITECTURE



SITE PLAN
1845-1885 N ROLLINS ROAD
BURLINGAME, CALIFORNIA

PROJECT NO.: 19122.000.001

SCALE: AS SHOWN

DRAWN BY: BU

CHECKED BY: SPM

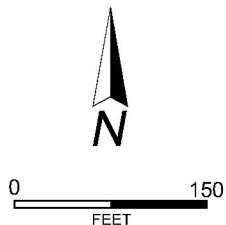
FIGURE NO.

2

ORIGINAL FIGURE PRINTED IN COLOR

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EXPLANATION

ALL LOCATIONS ARE APPROXIMATE

UST ● APPROXIMATE ABANDONED UNDERGROUND STORAGE TANK

BASE MAP SOURCE: GOOGLE MAPPING SERVICE



ASSESSOR'S PARCEL MAP
1845-1885 N ROLLINS ROAD
BURLINGAME, CALIFORNIA

PROJECT NO.: 19122.000.001

SCALE: AS SHOWN

DRAWN BY: BU

CHECKED BY: SPM

FIGURE NO.

3

ORIGINAL FIGURE PRINTED IN COLOR



PHOTO 1

FORK LIFTS AT 1881 ROLLINS



PHOTO 2

TRUCK LOADING AT 1881 ROLLINS



PHOTO 3

ELECTRIC CRANE AT 1881 ROLLINS



PHOTO 4

RAILROAD SPUR AT 1881 ROLLINS



PHOTO 5

TRUCK STORAGE AT REAR OF 1881 ROLLINS



PHOTO 6

PILATES STUDIO AT 1881 ROLLINS



BASKETBALL COURT AT 1881 ROLLINS



STORAGE AT 1881 ROLLINS



BUILDING AND LANDSCAPING AT 1855 ROLLINS



PARKING LOT AT 1855 ROLLINS

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Attachment B: Phase II Environmental Site Assessment

Project No.
19122.000.001

October 19, 2021

Ms. Kristen Gates, PE
Hanover R.S. Limited Partnership
1780 South Post Oak Lane
Houston, TX 77056

Subject: 1881 N. Rollins Road
Burlingame, California

PHASE II ENVIRONMENTAL SITE ASSESSMENT

Dear Ms. Gates:

We are pleased to submit the findings of our phase II environmental site assessment (ESA) performed at the subject property (Property) in Burlingame, California. The purpose of this assessment was to evaluate potential impacts from current and former railroad spurs on the Property.

LOCATION AND BACKGROUND

The Property is located at 1845-1885 N. Rollins Road in Burlingame (Figure 1). The approximately 5.2-acre Property is identified as Assessor's Parcel Number (APN) 025-166-230 and 025-166-240. The Property consists of three warehouse structures, an office structure, paved parking lots, landscaping, and an out-of-service railroad spur. The four structures are currently occupied by a moving company, a physical therapist, and basketball training facility. Review of historical records indicates that the Property has been occupied by multiple warehouse structures since at least 1963.

FIELD EXPLORATION

Field sampling activities associated with the phase II ESA were performed on August 27, 2021. Prior to drilling, an ENGEO representative contacted USA North Service Alert for identification of underground utilities at the Property as well as a private utility locator on the day of drilling. A C-57 licensed drilling contractor was retained to advance soil borings at the Property.

A total of ten borings (B1 through B10) were advanced to a depth of approximately 2 feet below the ground surface, along the former and current railroad spurs. Soil samples were collected at depths of 6 to 12, 12 to 18, and 18 to 24 inches below the ground surface from each of the borings. The laboratory was instructed to hold the deeper samples pending results of the shallow samples (6 to 12 inches). Borings were grouted upon completion of sampling.

The samples were labeled to indicate a unique sample number, sample location, time and date collected, and the sampler's identification. Samples were preserved in a chilled cooler and transported to Torrent Laboratory, Inc., a State-certified laboratory, in Milpitas, California under documented chain-of-custody.

Shallow soil samples (6 to 12 inches) from each boring were initially analyzed for lead and arsenic on a discrete basis (EPA Method 6010). In addition, five 2:1 (horizontal:vertical) composite samples were analyzed for total petroleum hydrocarbons as diesel (TPH-d) and TPH as motor oil (TPH-mo) (EPA Method 8015B), and polycyclic aromatic hydrocarbons (PAHs) (EPA Method 8270).

ANALYTICAL RESULTS

Soil sample results were compared to the San Francisco Regional Water Quality Control Board's (RWQCB) Environmental Screening Levels (ESLs) for residential land use¹. The following is a summary of the analytical results.

- Arsenic concentrations ranged between 1.16 to 11.2 milligrams per kilogram (mg/kg), which are generally consistent with the typical background concentration observed in San Francisco Bay Area (approximately 11 mg/kg)².
- TPH-d and TPH-mo were detected at concentrations below the corresponding residential screening levels.
- Lead was detected at a concentration of 365 mg/kg in soil sample B-9@6-12", which exceeds its respective ESL for a residential land use scenario (80 mg/kg). The deeper samples at that location were subsequently analyzed for lead. Lead was detected above the residential land use ESL in the sample collected at 12 to 18 inches (112 mg/kg) but below the corresponding residential screening level in the sample collected at 18 to 24 inches (3.12 mg/kg). All other lead concentrations across all samples were detected below the corresponding ESL.
- All PAHs were reported at concentrations below the corresponding residential screening levels in the composite soil samples, with the exception of B3,4@6-12" composite, which exhibited concentrations of naphthalene (0.13 mg/kg) and benzo(a)pyrene (B(a)P) (0.12 mg/kg) above the corresponding residential ESLs. The B3,4@6-12" composite was analyzed on a discrete basis, and B(a)P was detected at a concentration of 0.17 mg/kg in B4@6-12". The B(a)P equivalent concentrations in these samples were below 0.9 mg/kg, which is a common background concentration in urban environments.

A summary of sample results is presented in Table A. The laboratory analytical report is presented in its entirety in Appendix A.

CONCLUSIONS

Lead concentrations were identified in surface soil at a single location at the terminus of one of the out-of-service railroad spurs at the Property. The areal extent of impact above residential screening levels is likely confined to the railroad bed in this location, and the depth appears to be limited to the upper 18 inches. Given the isolated nature of this impact, the impacted soil may be excavated; following excavation, it may be re-tested for characterization for off-site disposal or on-site management, which would be determined based on the characterization of this material. Alternatively, additional in-situ soil testing may be considered to refine the extent of the impact. Once completed, soil could be excavated and directly loaded for transport and off-site disposal. Given the reported concentrations of these materials, additional analysis would likely be required by the receiving facility to determine the soluble lead concentration.

¹ San Francisco Regional Water Quality Control Board (Environmental Screening Levels (ESLs), Direct Exposure Human Health Risk Levels (Table S-1), Shallow Soil, Residential Exposure and Commercial/Industrial Exposure, January 2019, Rev 2.

² Duvergé, D.J., Establishing Background Arsenic in Soil of the Urbanized San Francisco Bay Region, December 2011.

Although one sample exhibits an arsenic concentration (11.2 mg/kg) marginally above the commonly accepted naturally occurring background concentration for the San Francisco Bay Area (11 mg/kg), this is not considered indicative of anthropogenic environmental impact.

Sample B4@6-12" exhibited a B(a)P concentration of 0.17 mg/kg. The B(a)P equivalent concentration in this sample is below 1 mg/kg, which is a common background concentration in urban environments; therefore, this detection is not considered to be an environmental risk for the Property.

In conjunction with moving forward with the redevelopment of the Property, we recommend that a soil management plan (SMP) be prepared for the Property. The SMP would present procedures and protocols for soil management during demolition, grading, and construction activities, as well as provide protocols in the event that unforeseen environmental conditions are encountered during construction activities.

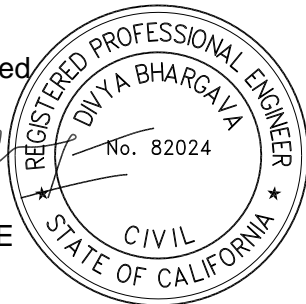
If you have any questions or comments regarding this letter, please call and we will be glad to discuss them with you.

Sincerely,

ENGEO Incorporated



Divya Bhargava, PE



Jeffrey A. Adams, PhD, PE

db/jaa/dt

Attachments: Figures 1 and 2

Table A – Summary of Soil Analytical Results

Appendix A – Torrent Laboratory, Inc. Laboratory Analytical Report

FIGURES

Figure 1: Vicinity Map
Figure 2: Site Map



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BASE MAP SOURCE: GOOGLE EARTH MAPPING SERVICE



VICINITY MAP
1881 ROLLINS ROAD
BURLINGAME, CALIFORNIA

PROJECT NO.: 19122.000.001

SCALE: AS SHOWN

DRAWN BY: CC

CHECKED BY: SPM

FIGURE NO.

1

ORIGINAL FIGURE PRINTED IN COLOR



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EXPLANATION

ALL LOCATIONS ARE APPROXIMATE

B-10  SOIL SAMPLE (ENGEО, 2021)

BASE MAP SOURCE: GOOGLE EARTH MAPPING SERVICE



SITE PLAN
1881 ROLLINS ROAD
BURLINGAME, CALIFORNIA

PROJECT NO.: 19122.000.001

SCALE: AS SHOWN

DRAWN BY: CC

CHECKED BY: SPM

FIGURE NO.

2

ORIGINAL FIGURE PRINTED IN COLOR

TABLE A

Summary of Soil Analytical Results

Table A - Summary of Soil Analytical Results

Sample	Date	Metals		TPHs		SVOCs																	
		Arsenic mg/kg	Lead mg/kg	TPH-d mg/kg	TPH-mo mg/kg	Naphthalene mg/kg	2-Methylnaphthalene mg/kg	1-Methylnaphthalene mg/kg	Acenaphthylene mg/kg	Acenaphthene mg/kg	Fluorene mg/kg	Phenanthrene mg/kg	Anthracene mg/kg	Fluoranthene mg/kg	Pyrene mg/kg	Benz[a]anthracene mg/kg	Chrysene mg/kg	Benzo[b]fluoranthene mg/kg	Benzo[k]fluoranthene mg/kg	Benzo[a]pyrene mg/kg	Indeno[1,2,3-cd]pyrene mg/kg	Dibenz[a,h]anthracene mg/kg	Benzo[g,h,i]perylene mg/kg
RWQCB ESLs Residential ¹		0.067	80	260	1600	0.042	0.88		6.4	12	6	7.8	1.9	0.69	45	0.63	2.2	1.1	2.8	0.11	0.48	0.11	2.5
B1@ 6-12"	8/27/2021	2.77	8.77	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
B2@ 6-12"	8/27/2021	1.58	11.4	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
B3@ 6-12"	8/27/2021	4.89	36.0	NA	NA	NA	NA	NA	0.0083	NA	NA	NA	NA	NA	0.024	0.052	0.033	0.043	0.015	0.031	0.034	NA	0.057
B4@ 6-12"	8/27/2021	3.38	27.2	NA	NA	NA	NA	NA	0.12	NA	NA	NA	0.23	NA	NA	0.29	0.28	0.19	0.066	0.17	0.41	NA	0.64
B5@ 6-12"	8/27/2021	3.26	4.98	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
B6@ 6-12"	8/27/2021	1.16	24.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
B7@ 6-12"	8/27/2021	11.2	7.20	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
B7@ 12-18"	8/27/2021	7.4	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
B8@ 6-12"	8/27/2021	3.70	7.80	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
B9@ 6-12"	8/27/2021	4.95	365	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
B9@ 12-18"	8/27/2021	NA	112	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
B9@ 18-24"	8/27/2021	NA	3.12	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
B10@ 6-12"	8/27/2021	2.98	6.38	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
B1.2@ 6-12" Composite	8/27/2021	NA	NA	2.94	22.9	0.0030	0.0020	0.0012	0.0066	0.00060	0.0012	0.0070	0.012	0.0095	0.012	0.0088	0.013	0.016	0.0056	0.0079	0.013	0.0025	0.021
B3.4@ 6-12" Composite	8/27/2021	NA	NA	ND	1310	0.13	ND	ND	0.084	ND	ND	0.093	0.14	0.14	0.19	0.18	0.30	0.25	0.087	0.12	0.28	0.043	0.54
B6.7@ 6-12" Composite	8/27/2021	NA	NA	ND	483	0.032	0.091	0.042	0.013	0.0036	0.0044	0.047	0.027	0.020	0.023	0.019	0.031	0.035	0.0082	0.020	0.027	0.0096	0.059
B8.9@ 6-12" Composite	8/27/2021	NA	NA	ND	258	0.0096	0.0095	0.0059	0.012	ND	ND	0.019	0.027	0.020	0.021	0.019	0.021	0.030	0.0082	0.010	0.019	ND	0.028
B5.10@ 6-12" Composite	8/27/2021	NA	NA	ND	10.7	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

Notes:

¹ Although arsenic concentrations exceed Residential screening levels, concentrations are within background levels observed within the San Francisco Bay Area.

² San Francisco Regional Water Quality Control Board (Environmental Screening Levels (ESLs), Direct Exposure Human Health Risk Levels (Table S-1), Shallow Soil, Residential Exposure and Commercial/Industrial Exposure, January 2019, Rev 2.

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**Attachment C: Draft Transportation Impact Study for the 1855-1881
Rollins Road Project**



September 21, 2022

Mr. Andrew Metzger
Circlepoint
200 Webster Street, Suite 200
Oakland, CA 94607

Transportation Impact Study for the 1855-1881 Rollins Road Project

Dear Mr. Metzger;

W-Trans has completed an analysis of the potential transportation impacts associated with the proposed Rollins Road Project, which would include the construction of 420 residential apartment units at 1855-1881 Rollins Road in the City of Burlingame. The purpose of this letter is to summarize these potential impacts under the guidelines of the California Environmental Quality Act (CEQA).

Project Description

The proposed project would include demolition of the existing site development, including a basketball training facility, moving company and warehouse, tile showroom, and theater company totaling approximately 106,220 square feet. A new five-story multi-family residential building with 420 apartment units, including 50 studio units, 233 one-bedroom units, 119 two-bedroom units, and 18 three-bedroom units, is proposed. 35 units, or 10 percent, would be designated as affordable for low-income households. The proposed project also includes an on-site parking garage with 545 vehicle spaces and 232 bicycle spaces.

Trip Generation

The anticipated trip generation for the proposed project was estimated using standard rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual*, 11th Edition, 2021. Because the site is currently occupied by recreational and commercial land uses, the trip generation of the existing land uses was estimated and deducted.

A review of available land use descriptions contained in the ITE manual indicates that the existing land uses are similar to ITE published land uses, but require adjustments based on hours of operation, building capacity, and services provided. The rates for the basketball training facility most closely aligned with the ITE rates published for "Athletic Club" (ITE LU #493). However, the basketball courts do not open before 10 a.m. and therefore no a.m. peak hour trips should be generated. Daily trips were estimated based on the hours of operation of 10:00 a.m. to 7:00 p.m. The moving company and warehouse trip generation rates would most closely match those of "Warehousing" (ITE LU#150). Similarly, the tile showroom can be expected to generate a similar number of trips as a "Furniture Store" (ITE LU#890). However, the showroom hours are from 12:00 p.m. to 5:00 p.m., meaning that no a.m. peak hour trips should be generated. The theater company, which only has shows seasonally and during off-peak periods, was conservatively assumed to generate no trips. For the proposed land use, the most appropriate trip generation rate is "Multifamily Housing (Mid-Rise)" (Land Use #221) with the "Close to Rail Transit" subcategory.

Based on these assumptions, the proposed project is expected to generate an average of 1,995 daily trips, including 134 a.m. peak hour trips and 122 trips during the p.m. peak hour. This represents a net increase in trips over the existing land uses of 1,592 trips per day including 103 and 38 more trips during the a.m. and p.m. peak hours, respectively. These results are summarized in Table 1.

Table 1 – Trip Generation Summary

Land Use	Units	Daily		AM Peak Hour				PM Peak Hour			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
Existing											
Basketball Training Facility*	5.80 ksf	34.48	-200	0	0	0	0	6.29	-36	-22	-14
Warehousing	59.68 ksf	2.23	-133	0.52	-31	-24	-7	0.57	-34	-10	-24
Tile Showroom*	26.45 ksf	2.65	-70	0	0	0	0	0.52	-14	-7	-7
Theater Company*	14.29 ksf	0	0	0	0	0	0	0	0	0	0
Subtotal Existing Trips		-403		-31 -24 -7				-84 -39 -45			
Proposed											
Multifamily Housing (Mid-Rise)	420 du	4.75	1,995	0.32	134	75	59	0.29	122	52	70
Net New Trips		1,592		103 51 52				38 13 25			

Note: ksf = 1,000 square feet; du = dwelling unit; * = rates adjusted to better match existing land use, not published by ITE

Regulatory Setting

This section describes federal, State, regional, and local environmental laws and policies that are relevant to the CEQA review process for transportation and circulation. These policies provide a context for the impact discussion related to the proposed project's consistency with the applicable regulatory conditions.

Federal Regulations

The Americans with Disabilities Act (ADA) of 1990 provides comprehensive rights and protections to individuals with disabilities. The goal of the ADA is to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities. To implement this goal, the US Access Board, an independent federal agency created in 1973 to ensure accessibility for people with disabilities, has created accessibility guidelines for public rights-of-way. While these guidelines have not been formally adopted, they have been widely followed by jurisdictions and agencies nationwide in the last several decades. These guidelines, last revised in July 2011, address various issues, including roadway design practices, slope and terrain issues, and pedestrian access to streets, sidewalks, curb ramps, street furnishings, pedestrian signals, parking, public transit, and other components of public rights-of-way. These guidelines would apply to proposed roadways in the study area.

State Regulations

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law, supporting previous climate-focused and transportation legislation, including the Sustainable Communities and Climate Protection Act of 2008 (SB 375) and the California Global Warming Solutions Act of 2006 (AB 32). SB 743 also supports implementation of the Complete Streets Act (AB 1358), which requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users. To further the State's commitment to the goals of SB 375, AB 32 and AB 1358, SB 743 added Chapter 2.7, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, to Division 13 (Section 21099) of the Public Resources Code.

SB 743 introduced fundamental changes in the assessment of transportation impacts through the CEQA process. These changes include the elimination of auto delay (measured as Level of Service, or LOS) as a basis for determining significant transportation impacts. SB 743 included amendments that revised the definition of “infill opportunity zones” to allow cities and counties to opt out of traditional LOS standards established by congestion management programs (CMPs) and required the California Governor’s Office of Planning and Research (OPR) to update the CEQA Guidelines and establish “criteria for determining the significance of transportation impacts of projects within transit priority areas.” As part of these CEQA guidelines, the new criteria “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” SB 743-compliant CEQA analysis became mandatory on July 1, 2020.

In December 2018, OPR released a final advisory to guide lead agencies in implementing SB 743, the “Technical Advisory on Evaluating Transportation Impacts in CEQA.” Key guidance includes:

- VMT is the most appropriate metric to evaluate a project’s transportation impact under CEQA.
- Tour- and trip-based travel models are recommended for estimating VMT, but local agencies have the authority to select the tools they use.
- VMT for residential and office projects are generally assessed using efficiency metrics, i.e., on a “per rate” basis.
- The recommended threshold of significance for residential and office projects is VMT per capita or per employee that is fifteen percent below the city or regional average (whichever is applied). In other words, a residential or office project that generates VMT per employee that is more than 85 percent of the regional VMT per employee could result in a significant impact. This threshold is in line with statewide GHG emission reduction targets.
- Lead agencies have the discretion to set or apply their own significance thresholds in lieu of those recommended in the advisory, provided they are based on substantial evidence.
- Cities and counties still have the ability to use metrics such as LOS for other plans, studies, or network monitoring. However, LOS and similar congestion-related metrics are no longer considered CEQA impacts.

California Complete Streets Act of 2008 (Assembly Bill 1358)

Originally passed in 2008, California’s Complete Streets Act came into force in 2011 and requires local jurisdictions to plan for land use transportation policies that reflect a “complete street” approach to mobility. “Complete streets” comprises a suite of policies and street design guidelines which provide for the needs of all road users, including pedestrians, bicyclists, transit operators and riders, children, the elderly, and the disabled. From 2011 onward, any local jurisdiction—county or city—that undertakes a substantive update of the circulation element of its general plan must consider “complete streets” and incorporate corresponding policies and programs.

Regional Regulations

Plan Bay Area 2040

Plan Bay Area 2040 was adopted in 2017 by the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG). As a single plan for the nine-county San Francisco Bay Area that includes the Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS), Plan Bay Area 2040 sets forth regional transportation policy and provides capital program planning for all regional, State, and Federally funded projects.

As the RTP, Plan Bay Area 2040 provides strategic investment recommendations to improve regional transportation system performance, including investments in regional highway, transit, local roadway, bicycle, and pedestrian facilities. These projects were identified through regional and local transportation planning processes. Plan Bay Area 2040 was the most current iteration of Plan Bay Area at the time when this study was initiated.

San Mateo County Comprehensive Bicycle and Pedestrian Plan

The Countywide Bicycle and Pedestrian Plan (CBPP) provides a framework to help the City/County Association of Governments of San Mateo County (C/CAG) improve walking and bicycle conditions in San Mateo County. By recommending a connected network of biking and walking facilities based on the best practices in the field, this Plan will make biking and walking safer and more comfortable for all, and improve health, accessibility, and livability throughout the county.

C/CAG is the County's Congestion Management Agency and is responsible for transportation planning, programming, and funding. This includes developing and updating the region's Congestion Management Plan and bicycle and pedestrian plans. This Plan builds on previous walking and bicycling planning efforts, including the *San Mateo County Comprehensive Bicycle Route Plan* (2000) and *San Mateo County Comprehensive Bicycle and Pedestrian Plan* (2011).

This Plan presents countywide priorities and provides project lists and program and design guidance which C/CAG and local jurisdictions can use to make roadways safer, reduce congestion, and encourage more people to walk and ride a bicycle.

Congestion Management Program

In 1990, California voters approved Propositions 111 and 108, which included a requirement that every urban county within California designate a CMA that would prepare, implement, and biennially update a CMP. In San Mateo County, C/CAG was designated as the CMA. Subsequent legislation (AB 2419) allowed existing Congestion Management Agencies to discontinue participation in the Program; however, C/CAG voted to continue to participate in and adopt a CMP.

According to the state legislation, the purpose of CMPs is to develop a procedure to alleviate or control anticipated increases in roadway congestion and to ensure that "federal, state, and local agencies join with transit districts, business, private and environmental interests to develop and implement comprehensive strategies needed to develop appropriate responses to transportation needs." The first CMP for San Mateo County was adopted by C/CAG in 1991. It has been updated and amended on a biennial basis. The last CMP update was in 2021. An update in 2023 is required by the State statute.

Bay Area Air Quality Management District

The Bay Area Air Quality Management District (BAAQMD) is the public agency tasked with regulating air pollution in the nine-county Bay Area, including San Mateo County. As a primary source of air pollution in the Bay Area region is from motor vehicles, air district regulations affect transportation planning in the project study area. The BAAQMD's goals include reducing health disparities due to air pollution, achieving, and maintaining air quality standards, and implementing exemplary regulatory programs and compliance with federal, state, and regional regulations.

Metropolitan Transportation Commission

The Metropolitan Transportation Commission (MTC) is the transportation planning, coordinating, and financing agency for the nine-county Bay Area, including San Mateo County. It also functions as the federally mandated metropolitan planning organization (MPO) for the region. It is responsible for regularly updating the Regional Transportation Plan (RTP), a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities.

Local Regulations

General Plan

The *City of Burlingame General Plan* (adopted January 2019) provides a framework for development within the City. Policies and strategies that are pertinent to the transportation analysis for the proposed project are summarized below:

- Policy CC-1.3 Promote walkable neighborhoods and encourage pedestrian activity by designing safe, welcoming streets and sidewalks that incorporate signalized crosswalks, attractive lighting and landscaping, curb extensions, and traffic-calming measures at appropriate locations.
- Policy CC-1.4 Study options for reduced residential parking requirements in areas that are well served by public transportation, such as the North Burlingame and North Rollins Road areas. Implement preferred options.
- Policy CC-1.5 Require that all major development projects include a Transportation Demand Management (TDM) program, as defined in the City's TDM regulations, to reduce single-occupancy car trips. "Major development" shall be defined in the TDM regulations by square footage for commercial development, or minimum number of units for residential development.
- Policy CC-12.3 Establish a creative Live/Work district at the north end of the Rollins Road corridor within approximately one-half mile of the Millbrae multimodal transit station; accommodate medium- and high-density residential uses either as stand-alone development or as integrated live/work environments.
- Policy CC-12.9 Promote a pedestrian-friendly environment, particularly in the Live/Work district. Require new development to create active street frontages, with workspaces or commercial uses on the ground floor, attractive landscaping and street trees, and other streetscape enhancements as appropriate.
- Policy CC-12.10 Study opportunities for signalized pedestrian crossings along Rollins Road and identify pedestrian connectivity improvements between the Live/Work district and the Millbrae Multimodal BART station.
- Policy M-1.1 Define and develop a well-connected network of Complete Streets that can move all modes safely, efficiently, and comfortably to promote efficient circulation while also improving public health, safety, and accessibility.
- Policy M-2.1 Expand pedestrian access by eliminating gaps in sidewalk and path networks, improving safety, and requiring safe and comfortable pedestrian facilities.
- Policy M-3.1 Develop a safe, convenient, and integrated bicycle network that connects residential neighborhoods to employment, education, recreation, and commercial destinations throughout Burlingame.
- Policy M-3.6 Provide standards in the Zoning Code that address required bicycle parking, including provisions for secured facilities, as well as other development features and incentives that encourage bicycle use (e.g., changing rooms at places of business).
- Policy M-5.1 Establish specific TDM guidelines and requirements within the Zoning Code that encourage travel by a variety of modes for both individuals and employees, focusing different strategies in different parts of the community as appropriate to promote sustainability and economic development.
- Policy M-5.2 Develop outreach materials for specific neighborhoods in the city that are suitable for increased transit ridership given their proximity to bus stops or train stations as a way to reduce drive-alone automobile trips.
- Policy M-6.1 Plan for and accommodate land uses that facilitate development of compact, mixed-use development with the density, diversity of use, and local accessibility supportive of transit use.
- Policy M-7.3 Reduce or eliminate minimum parking requirements and/or implement parking maximums for housing, commercial, office, and other land uses in mixed use areas and in proximity to frequent transit services. Comprehensively examine parking requirements in the Zoning Code and adjust as needed to respond to evolving vehicle ownership patterns and parking practices.
- Policy M-7.4 Require that the design of parking lots and structures meets urban design objectives and minimizes negative impacts on people walking and biking, on transit users, and on the built environment.

Where feasible, design parking structures to be adaptable to other uses in the future to accommodate potential changes in mobility and parking practices.

- Policy M-7.5 Promote and support creative approaches to parking, including but not limited to use of parking lifts and shared parking, particularly in mixed-use and retail areas. In Downtown and the Live/Work designation, include consideration of “unbundling” parking from residential development projects, whereby parking is provided as an amenity paid for separately from a lease.
- Policy M-7.6 Reduce parking demand through travel options programs such as parking cash-out and other TDM strategies.
- Policy M-8.2 Support vehicle trip reduction strategies, including building safer and more inviting active transportation networks, supporting connections to high frequency and regional transit, implementing TDM programs, and integrating land use and transportation decisions.
- Policy M-13.1 Investigate and implement improvements to the north end of Rollins Road that will provide complete streets treatments that allow convenient and safe bike and pedestrian access across Millbrae Avenue to the BART station, as well as within the Live/Work land use district.

Bicycle and Pedestrian Master Plan

The *City of Burlingame Bicycle and Pedestrian Master Plan* (adopted December 7, 2020) establishes a long-term vision for improving walking and bicycling in Burlingame and presents a strategy to develop a comprehensive bicycling and walking network that provides access to transit, schools and downtown. This document also identifies a plan to implement these projects and programs through prioritization to ensure projects are management and fundable.

This plan is an essential tool for guiding City staff and the development community in building a balanced transportation system where active modes are supported and accessible. The goal of the plan is to promote walking and bicycling through the creation of safe, comfortable, and connected networks, and to encourage alternatives to single-occupancy motor vehicle trips.

CEQA Checklist

Following is a discussion and analysis of transportation-related CEQA checklist items. The results are summarized in Table 2 and a discussion of each criterion follows.

Table 2 – XVII. TRANSPORTATION/TRAFFIC

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

Discussion of CEQA Checklist Items

- a. *Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

The proposed project was evaluated to determine whether it would conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bicycle racks, Class IV bikeways, etc.) or generate pedestrian, bicycle, or transit travel demand that would not be accommodated by existing transit, bicycle, or pedestrian facilities and plans.

Employees traveling to the proposed project site would have the option of driving, taking transit, walking or cycling to and from the proposed project.

Pedestrian Facilities

Pedestrian facilities include sidewalks, crosswalks, pedestrian signal phases, curb ramps, curb extensions, and various streetscape amenities such as lighting, benches, etc. In general, a connected network of sidewalks, crosswalks, pedestrian signals, and curb ramps provides access for pedestrians in the vicinity of the project site; however, sidewalk gaps, obstacles, and barriers can be found along some of the roadways connecting to the project site. Existing gaps and obstacles along the connecting roadways impact convenient and continuous access for pedestrians and present safety concerns in those locations where appropriate pedestrian infrastructure would address potential conflict points.

- **Rollins Road** – Continuous sidewalks are provided on Rollins Road within the vicinity of the proposed project. In general, Rollins Road has adequate pedestrian facilities including crosswalks, curb ramps, overhead streetlights, etc.
- **Broderick Road** – Sidewalks currently do not exist along the project frontage on the west side of Broderick Road but would be installed as part of the project. Continuous sidewalk exists on the east side of Broderick Road connecting to Rollins Road.
- **Millbrae Avenue** – Sidewalks are provided on most of Millbrae Avenue. Where sidewalks exist, Millbrae Avenue has adequate pedestrian facilities. On the east side of the US 101 Southbound on-ramp, sidewalks do not exist adjacent to the westbound travel lanes. The City of Millbrae, as documented in the City's 2021 *Active Transportation Plan*, is studying improvements along Millbrae Avenue, including addressing sidewalk gaps and providing a shared-use path on the south side of the road between Rollins Road and Old Bayshore Avenue.

Bicycle Facilities

The *Highway Design Manual*, Caltrans, 2019, classifies bikeways into four categories:

- **Class I Multi-Use Path** – a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.
- **Class II Bike Lane** – a striped and signed lane for one-way bike travel on a street or highway.
- **Class III Bike Route** – signing only for shared use with motor vehicles within the same travel lane on a street or highway.
- **Class IV Bikeway** – also known as a separated bikeway, a Class IV Bikeway is for the exclusive use of bicycles and includes a separation between the bikeway and the motor vehicle traffic lane. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

In the project area, Class II bike lanes exist on California Drive between Murchison Drive and Broadway. Bicycle lanes also exist on the southbound side of Rollins Road between Broderick Road and Marsten Road. Class III bike lanes exist on the southbound side of Rollins Road between Millbrae Avenue and Broderick Road, as well as the

northbound side of Rollins Road between Broadway and Millbrae Avenue. Bicyclists ride in the roadway and/or on sidewalks along all other streets within the project study area. Planned improvements include Class I bikeways on California Drive, Class II bike lanes on Adrian Road, and Class IV bikeways on Rollins Road. Table 3 summarizes the existing and planned bicycle facilities in the project vicinity, as contained in the *City of Burlingame Bicycle and Pedestrian Master Plan, 2020*.

Table 3 – Bicycle Facility Summary

Status Facility	Class	Length (miles)	Begin Point	End Point
Existing				
<i>California Dr*</i>	II	1.3	Murchison Dr	Broadway
<i>Rollins Rd</i>	II	1.0	Broderick Rd	Marsten Rd
<i>Rollins Rd</i>	III	1.3	Broadway	Millbrae Ave
<i>Rollins Rd</i>	III	0.2	Millbrae Ave	Broderick Rd
Planned				
<i>California Dr</i>	I	2.5	North City Limits	North Ln
<i>Adrian Rd*</i>	II	0.25	Rollins Rd	Adrian Ct
<i>Rollins Rd</i>	IV	1.3	North City Limits	Broadway

Notes: * All or portions of these bikeways are located within City of Millbrae jurisdiction

Source: *City of Burlingame Bicycle and Pedestrian Master Plan, 2020*

Transit Facilities

During the 2020-2022 Coronavirus (COVID-19) Global Pandemic, transit agencies throughout the San Francisco Bay Area significantly reduced the amount of service provided. This includes the number of routes and bus stops serviced, the frequency of buses and trains, and service hours.

SamTrans

The San Mateo County Transit District (SamTrans) provides fixed route bus service in Burlingame and throughout San Mateo County. SamTrans buses are equipped with bike racks that can carry three bicycles. Bike rack space is on a first come, first served basis and riders must be able to load and unload their bicycles without any help from the operator. Two additional bicycles are allowed on SamTrans buses at the discretion of the driver and depending on passenger loads. The SamTrans bus stop nearest the project site is at the Millbrae BART transit plaza, located approximately one-quarter of a mile from the project site and is served by two routes.

Route 397 provides service between San Francisco and Palo Alto with stops on El Camino Real in Burlingame. Route 397 operates seven days a week with 60-minute headways. The northbound route operates three buses between 12:46 a.m. and 4:54 a.m., while the southbound route operates four buses from 1:15 a.m. to 6:37 a.m.

Route ECR provides service between Daly City BART and Palo Alto with stops on El Camino Real within the study area. Route ECR operates seven days a week with 15- to 20-minute headways between 4:00 a.m. and 1:30 a.m. on weekdays and 30-minute headways between around 5:00 a.m. and 2:00 a.m. on weekends.

Redi-Wheels, also known as paratransit, or door-to-door service, is available for those who are unable to independently use the transit system due to a physical or mental disability. Redi-Wheels is designed to serve the needs of individuals with disabilities within SamTrans and the greater Burlingame area.

Commute.org

Commute.org is a joint powers agency located in San Mateo County. It provides free, first-last mile service to transit stations. Shuttle buses operate on Monday through Friday during the morning and afternoon commute hours. Commute.org provides a rewards program called STAR which offers commuters rewards for taking transit, biking, carpooling, or vanpooling. The Commute.org shuttle stop nearest the project site is at the Rollins Road/Guittard Road stop, approximately 800 feet from the project site; it is served by one route.

Route BAY provides service from the Millbrae BART station to the Ingold–Milldale neighborhood in Burlingame. Route BAY operates five days a week with 20-minute headways. The morning shuttles operate between 6:58 a.m. and 9:25 a.m., while the afternoon route operates from 3:53 p.m. to 6:38 p.m.

Caltrain

Caltrain is the commuter rail line serving the San Francisco Peninsula. It connects Burlingame with San Francisco to the north and San Jose and Gilroy to the south. On weekdays there are 104 trains servicing the Millbrae Station in the northbound and southbound directions, 46 of which provide limited-stop service, and another 12 provides express service. On weekends there are 32 trains that stop at each station in the northbound and southbound directions. The Millbrae Caltrain Station is located at 100 California Drive, approximately one-quarter of a mile from the project site. Both bicycle racks and lockers are provided at the Millbrae station. Bicycle racks are available on a first-come-first-served basis, while lockers must be reserved. Paid vehicle parking is available at the station for riders.

The addition of project-generated demand is generally expected to incrementally increase the use of transit within the study area. The additional transit trips would be spread out during the day and over several SamTrans bus lines, Commuter.org shuttle lines, BART rail lines, and Caltrain rail service. Transit providers regularly update services in response to changing levels of transit demand.

On-Demand Transportation Services

On-demand private vehicle services (e.g., taxi, Uber, Lyft, etc.) are available in the study area 24 hours a day. These vehicles can be used for trips within the study area and farther destinations, including nearby airports and major transit stations.

Finding – Pedestrian, bicycle, and transit facilities would be adequate to serve the project as proposed, based on the existing and proposed network of pedestrian, bicycle, and transit facilities within the study area. Additionally, the project would not conflict with any current programs, plans, ordinances, or policies addressing the circulation system. Therefore, the proposed project would be expected to have a less-than-significant impact on local programs, plans, ordinances, and policies.

b. Would the Project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

Senate Bill (SB) 743 established the potential increase in Vehicle Miles Traveled (VMT) associated with a project as the basis for determining transportation impacts of development projects. Because the City of Burlingame has not yet adopted a standard of significance for evaluating VMT, guidance provided by the California Governor's Office of Planning and Research (OPR) in the publication *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory*, 2018, was used.

Guidance provided by OPR with respect to assessing VMT for residential projects is that a project generating vehicle travel that is 15 or more percent below the existing citywide residential VMT per capita may indicate a less-than-significant transportation impact. Guidance provided also recommends the use of screening thresholds to quickly identify when a project should be expected to cause a less than significant impact without conducting a

detailed study (See CEQA Guidelines, 15036(c)(3)(C), 15128, and Appendix G.) The OPR publication, as well as CEQA Guidelines Section 15064.3(b)(1) indicate 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.” According to the walkshed map in the C/CAG VMT Estimation Tool, this project site is located within a Transit Priority Area (a half-mile walkshed of the El Camino Real transit corridor and the Millbrae Intermodal Station) and is therefore presumed to have a less-than-significant impact on VMT.

To further analyze the project’s VMT impact and support screening the project from a detailed VMT study, a brief analysis using the C/CAG VMT Estimation Tool was performed. According to the VMT Estimation Tool, the Citywide VMT per capita is 13.64 miles. Based on OPR guidance, a project generating a VMT that is 15 percent or more below this value, or 11.59 miles per capita, would have a less-than-significant VMT impact. The evaluation tool estimates that this project would have a project VMT rate of 3.4 miles per capita in the 2040 cumulative plus project scenario. Because this per capita VMT rate is below the significance threshold of 11.59 miles, the project would be considered to have a less-than-significant VMT impact. Supporting documentation from the C/CAG model is enclosed.

Finding – The project would be expected to have a less-than-significant transportation impact on vehicle miles traveled due to close proximity to the El Camino Real Transit Corridor and Millbrae Intermodal Station, as well as a project VMT rate below the significance threshold as estimated by the C/CAG VMT Estimation Tool.

- c. *Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Site Access

The project includes a five-story parking garage which would be accessed via two new 22-foot-wide roadways included with the project. Both roadways would have one 11-foot-wide lane per direction. Driveways on Rollins Road at the northwest corner of the project site and on Broderick Road at the southeast corner of the project site would provide access to the proposed on-site roadways. This project also includes the removal of seven existing driveways serving the previous land uses, reducing the site’s total number of vehicular access points from seven to two.

Pedestrian access to the project site would be provided at the main entrance facing Rollins Road at the northwest corner of the project site. Two secondary entrances, one on Rollins Road approximately 220 feet west of Broderick Road and one on Broderick Road just south of Rollins Road, would be provided as well. New sidewalks are also proposed along the project site frontage on Broadrick Road. Internal sidewalks and pathways would be provided within the project site to access the different buildings and parking garage. Three public plazas, which would include artwork, street trees, public seating, and trash receptacles, are proposed along the project frontage on Rollins Road.

Sight Distance

At typical driveways a substantially clear line of sight should be maintained between the driver of a vehicle waiting on the driveway and the driver of an approaching vehicle. Adequate time should be provided for the waiting vehicle to either cross, turn left, or turn right, without requiring the through traffic to radically alter their speed.

The site would be accessed by vehicles via a driveway located on Rollins Road at the northwest corner of the project site and a driveway located on Broderick Road at the southeast corner of the site. Sight distance at these access points was evaluated based on sight distance criteria contained in the *Highway Design Manual* published by Caltrans. Recommended sight distances for minor street approaches that are either a private road or a driveway are based on stopping sight distance, which uses the approach travel speeds as the basis for determining the

recommended sight distance. Given the posted speed limit of 35 mph on Rollins Road and *prima facie* speed limit of 25 miles per hour on Broderick Road, the recommended stopping sight distances are 250 and 150 feet, respectively.

Both Rollins Road and Broderick Road are generally level and have unobstructed sight lines for at least 300 feet in every direction, which exceeds the recommendation contained in the *Highway Design Manual*. However, parked cars adjacent to the driveways and unmaintained vegetation can hinder sight distance by blocking view of the approaching traffic. Based upon this assessment, it is expected that the sight distance at the project driveways would be adequate if parking is prohibited within 10 feet of the driveways and adjacent vegetation is properly trimmed.

Finding – Sight lines at the project driveways would be adequate to accommodate all turns into and out of the project site. The project must be designed to meet applicable Federal, State and City codes and regulations, and as a result would not introduce any new hazards in terms of its design. Adequate sight lines would be provided at the proposed project access points. The proposed project would not increase hazards due to geometric design features and would have a less-than-significant impact regarding geometric design features or incompatible uses.

Recommendation – Parking should be prohibited within 10 feet of the project driveways through the use of red curb. Existing or proposed landscaping within the vision triangle between drivers exiting the site and oncoming vehicles should be either low-lying (three feet high or less) or else trees with all branches trimmed to a minimum height of seven feet above the roadway elevation.

d. *Would the Project result in inadequate emergency access?*

Emergency Access

Emergency response vehicles would be able to service the site via Rollins Road to the east, Broderick Road to the south, and two proposed access aisles on the north and west edges of the project site as illustrated on the plan sheet (C4.0) enclosed. Since all roadway users must yield the right-of-way to emergency vehicles when using their sirens and lights, the added project-generated traffic would not impact access for emergency vehicles.

Finding – The project would result in a less-than-significant impact regarding adequacy of emergency access since emergency vehicles are able to access the site from public streets and on-site access aisles. Further, all roadway users must yield to emergency vehicles when using their lights and sirens.

Thank you for giving W-Trans the opportunity to provide these services. Please call if you have any questions.

Sincerely,



Nicholas Brunetto, PE
Associate Engineer



Mark Spencer, PE
Senior Principal



Kenneth Jeong, PE
Senior Engineer

MES/kbj-ngb/BUR027.L1

Enclosures: VMT Analysis Summary, Preliminary Fire Access Plan Sheet C4.0

Project Details

Timestamp of Analysis: July 15, 2022, 07:48:26 AM

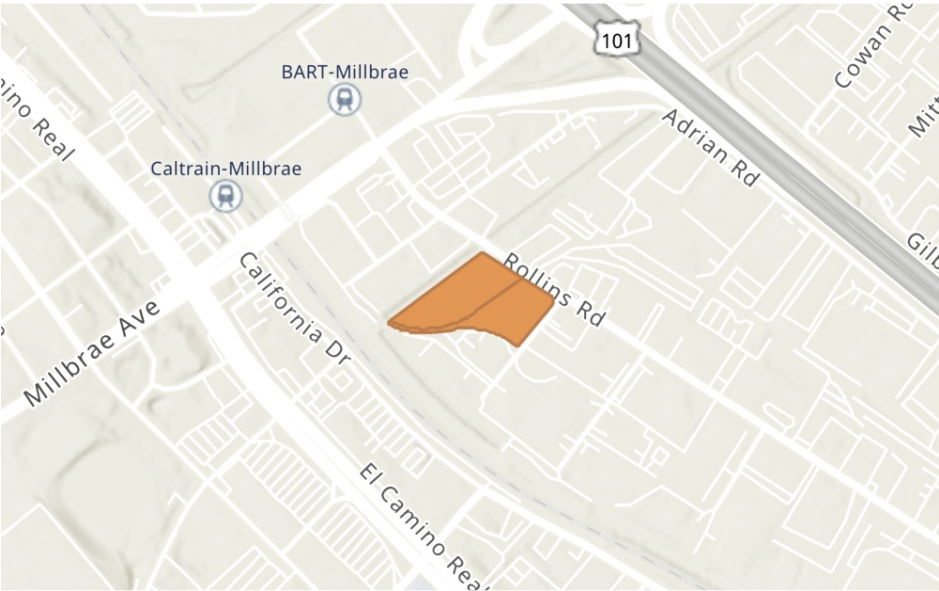
Project Name: 1855-1881 Rollins Road

Project Description: Rollins Road Multi-Family Development

Project Location

jurisdiction:	apn	TAZ
Burlingame	025166230	1652
	025166240	1652

Inside a TPA?
Yes (Pass)



Analysis Details

Data Version: C/CAG Travel Model

Analysis Methodology: TAZ

Baseline Year: 2022

Project Land Use

Residential:	
Single Family DU:	
Multifamily DU:	420
Total DUs:	420

Non-Residential:	
Office KSF:	
Local Serving Retail KSF:	
Industrial KSF:	

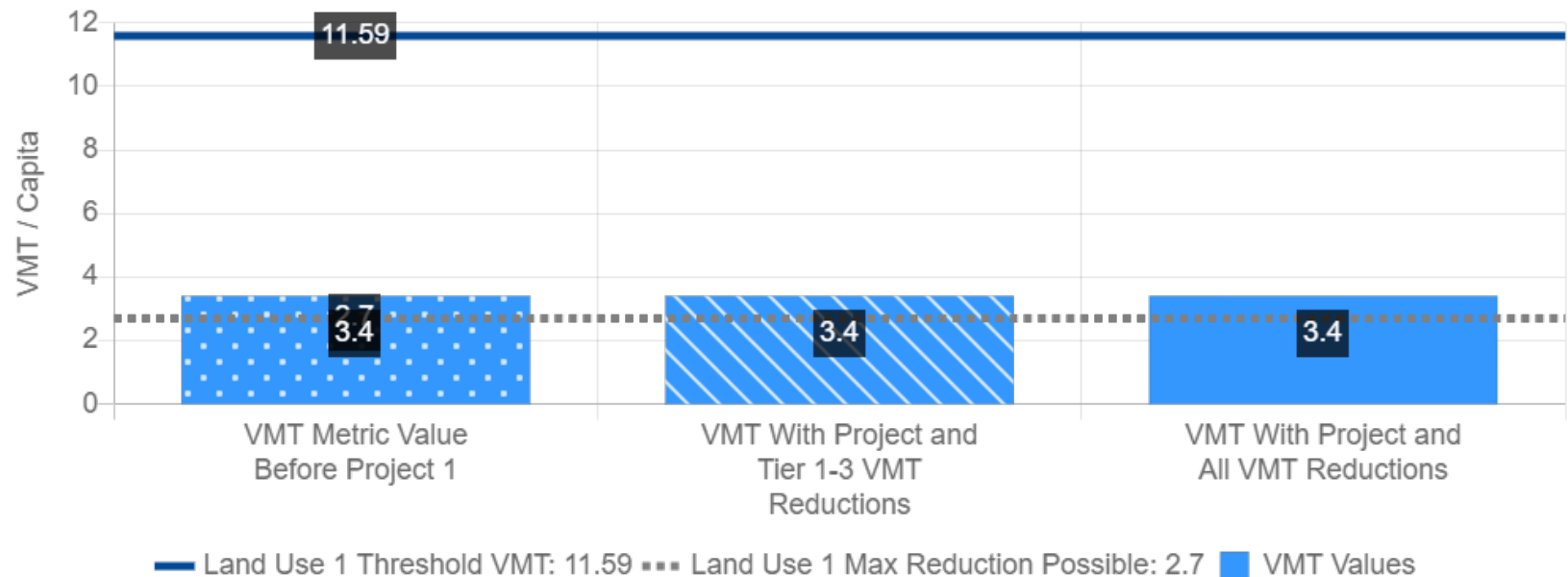
Residential Affordability (percent of all units):	
Extremely Low Income:	0 %
Very Low Income:	0 %
Low Income:	10 %

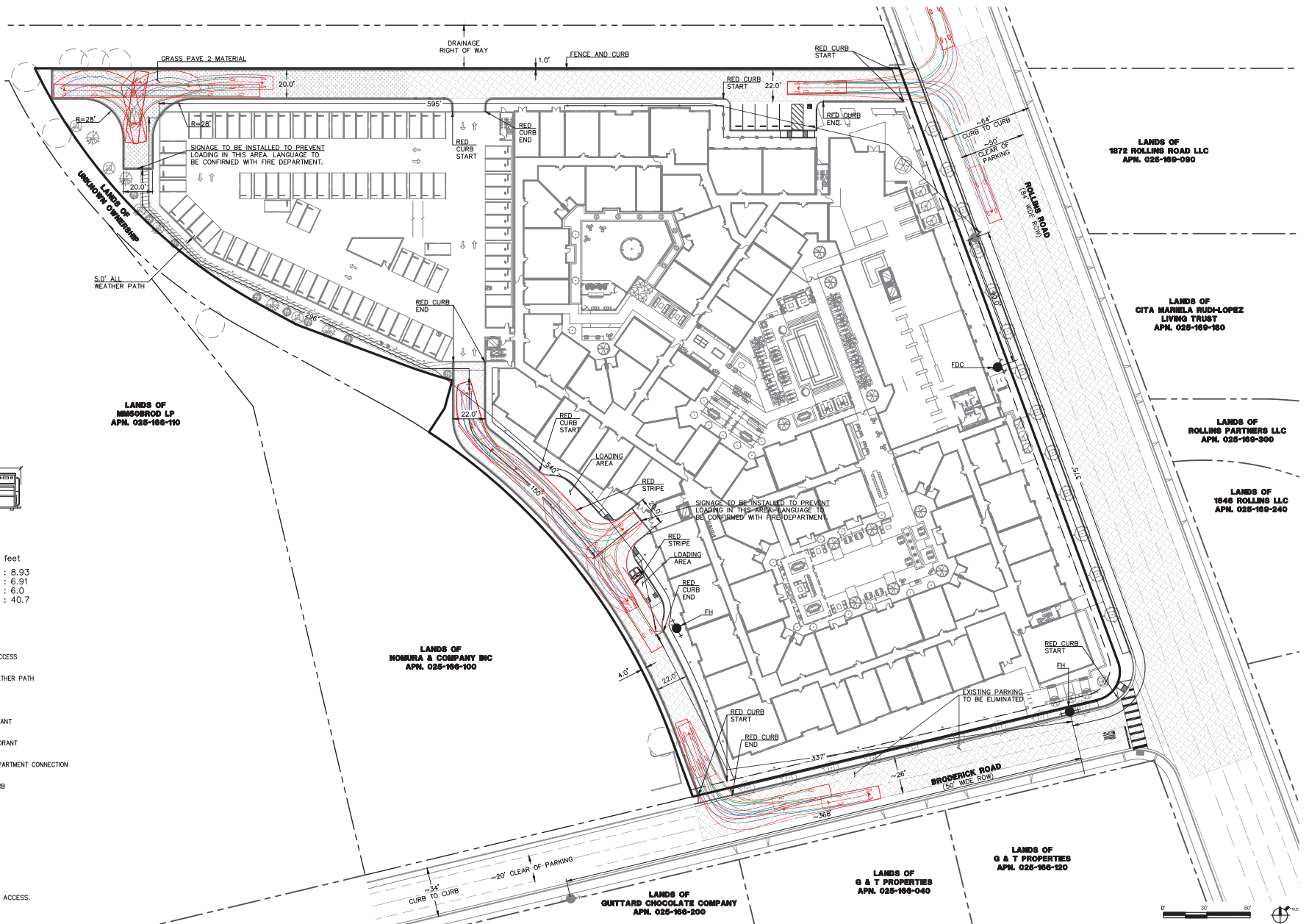
Parking:	
Motor Vehicle Parking:	544
Bicycle Parking:	203

Residential Vehicle Miles Traveled (VMT) Screening Results

Land Use Type 1:	Residential
VMT Without Project 1:	Home-Based VMT per Resident
VMT Baseline Description 1:	City Average
VMT Baseline Value 1:	13.64
VMT Threshold Description 1:	-15%
Land Use 1 has been Pre-Screened by the Local Jurisdiction:	N/A

	Without Project	With Project & Tier 1-3 VMT Reductions	With Project & All VMT Reductions
Project Generated Vehicle Miles Traveled (VMT) Rate	3.4	3.4	3.4
Low VMT Screening Analysis	Yes (Pass)	Yes (Pass)	Yes (Pass)





PROPOSED FIRE ACCESS PLAN

C4.0



1855-1881 N ROLLINS ROAD

APN: 025166230, 025166240

BURLINGAME, CALIFORNIA

MARCH 7, 2022

All drawings and written material appearing herein constitute original, and unpublished work of the architect and may not be duplicated, used or disclosed without the written consent of the architect.

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**Attachment D: 1855-1881 Rollins Road Residential Project
Construction Air Quality Emissions Letter Report**



Rincon Consultants, Inc.

449 15th Street, Suite 303
Oakland, California 94612

510 834 4455

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May 17, 2022
Project No: 22-12861

Andrew Metzger
Circlepoint
200 Webster Street, Suite 200
Oakland, California 94607

Submitted via email: a.metzger@circlepoint.com

Subject: 1855-1881 Rollins Road Residential Project Construction Air Quality Emissions Letter Report

Dear Mr. Metzger:

This letter report assesses the air quality emissions associated with the construction of the 1855-1881 Rollins Road Multiunit Residential Development Project in Burlingame, California, and evaluates project construction emissions against appropriate air quality thresholds. Operational emissions are not evaluated in this letter report. Rincon Consultants, Inc. (Rincon) prepared this letter report under contract to Circlepoint to support California Environmental Quality Act (CEQA) documentation for a Class 32 Categorical Exemption. The project is located in the San Francisco Bay Area Air Basin (SFBAAB) under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). This assessment is based on significance thresholds and methodologies in the BAAQMD's *CEQA Air Quality Guidelines*.¹

Project Location

The project site is located within the northern part of the City of Burlingame (City) in San Mateo County, California. The project site is a 4.993-acre property on three adjacent parcels (Assessor Parcel Numbers 025-166-230 and 025-166-240). The site is on the west side of Rollins Road just north of Broderick Road and is located within the North Rollins Road Mixed Use District (RRMU) with the Burlingame General Plan land use designation of Innovation Industrial. The site is currently developed with three industrial buildings totaling 106,219 square feet, and associated surface parking.

Project Description

The City has received an application for construction of a new 420-unit residential development at 1855-1881 Rollins Road, Burlingame (project). The proposed project would involve construction of a 5-story building comprising 420 residential apartment units and 11,901 square feet of lobby and amenity space,

¹ BAAQMD. 2017. *California Environmental Quality Act Air Quality Guidelines*. http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en



three interior common courtyards, three exterior public plazas, two open space areas, a 6-level parking structure with 545 spaces, and 6 additional surface parking spaces.

Project construction would begin in April 2023 and conclude in February 2025 and would be completed in one phase. Construction activities would include demolition of approximately 125,000 square feet of existing structures on the site, site grading, excavation for building foundations, concrete work, framing, and interior and exterior architectural coatings and would use equipment such as backhoes, dozers, and excavators. No pile driving is anticipated. The project would require lateral connections to sanitary sewer lines which exist in the public right-of-way along Rollins Road and Broderick Road, along with new connections to water, electricity, and gas lines. Imported fill would total 9,700 cubic yards. The project would require 1,100 cement truck round-trips and 900 cubic yards of asphalt. Construction activities would occur during daytime hours from 7:00 a.m. and 7:00 p.m. pursuant to Chapter 18.07.110 Section 305.1 of the Burlingame Municipal Code.

Methodology

Project emissions estimates were calculated using California Emissions Estimator Model (CalEEMod), version 2020.4.0. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects.

Construction emissions modeled include emissions generated by construction equipment used on-site and emissions generated by vehicle trips associated with construction, such as worker and vendor trips. Emissions were modeled assuming construction of a 5-story multifamily residential building with 420 units and an unenclosed parking area with an elevator. Based on information provided by the applicant, construction would require demolition of 125,000 square feet of the existing structures and 9,700 cubic yards of imported soil. Construction modeling was based on information provided by the applicant for a construction schedule of approximately 22 months from April 2023 to February 2025. The applicant provided construction phasing information as well as equipment type, equipment amount, and hours of operation which were used in this analysis. For the purposes of this analysis, it was assumed that 2025 would be the first full operational year. The analysis reflects the construction activities of the project as described above in the *Project Description*.

The project is within the Bay Area Air Quality Management District (BAAQMD) jurisdiction. BAAQMD regulates criteria pollutants emissions for construction-related activity. The construction emission estimates for the proposed project are discussed below. CalEEMod reports and calculations are included in Attachment 1 to this letter report.

Results

Delivery of construction materials, removal of existing materials, and construction at the project site would potentially generate air pollutant emissions. Table 1 summarizes the estimated maximum daily emissions of reactive organic gases (ROG), nitrogen oxide (NOx), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (PM₁₀, and PM_{2.5}) emissions associated with project construction. As shown in Table 1, the project's construction activities would not exceed BAAQMD's thresholds of significance for construction-related activities.



Table 1 Project Construction Emissions

Construction Year	Maximum Daily Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	PM ₁₀ Exhaust	PM _{2.5} Exhaust
2023	2	30	22	<1	1	1
2024	36	19	30	<1	1	1
2025	35	11	20	<1	<1	<1
Maximum Daily Emissions	36	30	30	<1	1	1
BAAQMD Thresholds	54	54	N/A	N/A	82	54
Threshold Exceeded?	No	No	No	No	No	No

lbs/day = pounds per day; ROG = reactive organic gases, NO_x = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter or less, PM_{2.5} = particulate matter 2.5 microns or less in diameter

See Attachment 1 for CalEEMod outputs. Summer emissions used for CO maximum daily emissions. All other values are from Winter emissions.

Source: BAAQMD 2017 CEQA Air Quality Guidelines https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en

Sincerely,
Rincon Consultants, Inc.

Kari Zajac, MESM
Senior Planner

Abe Leider, AICP CEP
Principal

**Attachment E: 1855-1881 Rollins Road Residential
Development Project Health Risk Assessment**



1885-1881 Rollins Road Multiunit Residential Development Project

Construction Health Risk Assessment

prepared for

Circlepoint

200 Webster Street, Suite 200
Oakland, California 94607

prepared by

Rincon Consultants, Inc.

449 15th Street, Suite 303
Oakland, California 94612

June 2022

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Appendix A Assumptions, Calculations, and Summary of Risk Tables

Appendix B HARP Output Reports

Appendix C AERMOD Output Reports

1 Introduction, Summary, and Project Description

1.1 Introduction

This Health Risk Assessment (HRA) analyzes the potential health effects associated with toxic air contaminant (TAC) emissions generated by construction activities for the proposed 1885-1881 Rollins Road Residential Project (proposed project) in Burlingame, California. This HRA was prepared by Rincon Consultants, Inc. (Rincon), under contract with Circlepoint. A Construction Air Quality Letter Report was previously prepared by Rincon, which found that the proposed project's air quality emissions would be below the significance thresholds set by Bay Area Air Quality Management District (BAAQMD) (Rincon Consultants 2022). The BAAQMD construction thresholds were established based on human health impacts related to air quality. The purpose of this HRA is to determine the potential for construction to pose health risks to nearby sensitive receptors.

1.2 Executive Summary

The project site is within the northern portion of the City of Burlingame in San Mateo County, and includes three adjacent parcels (Assessor Parcel Numbers 025-166-230 and 025-166-240). The project site is located east of Rollins Road and north of Broderick Road. This HRA estimates health risks associated with temporary emissions of TACs during construction of the proposed project. Specifically, construction activities would require the use of diesel-fueled heavy equipment and trucks, which would result in emissions of diesel particulate matter (DPM). The proposed project's operational uses would not include the types of uses that generate substantial TAC emissions (e.g. distribution centers, rail yards, ports, refineries, etc.). Therefore, this analysis focuses on health risks generated by temporary construction activities. This HRA reviews toxic air emissions from the construction activities of the proposed project to sensitive receptors within a 1,000-foot radius of the project's property line. The analysis also includes a cumulative health risk assessment for the maximally exposed individual (MEI) within a 1,000 foot radius from that receptor. The BAAQMD identifies typical sensitive receptors locations in schools, daycare facilities, hospitals, care facilities for seniors or disable persons, and residential areas (BAAQMD 2020). Therefore, this HRA reviews toxic air emissions within a 1,000-foot radius of the construction area and from the MEI.

The proposed project would involve the construction of a five-story multifamily residential building on the 4.993-acre project site, consisting of 420 residential units and 6-level parking structure. Construction would begin in April 2023 and end in February 2025. Existing structures on-site would be demolished. The total construction duration would be approximately 22 months.

Rincon conducted site-specific air dispersion modeling for this HRA to determine whether health risks presented to sensitive receptors from construction activities would exceed the BAAQMD health risk criteria. These risks include cancer and chronic risk from temporary sources of TAC emissions. The sensitive receptors near the project site are multi-family residential units, a skilled nursing facility, and assisted living apartments along Millbrae Avenue and California Drive.

The exposure duration used for this analysis is three years, based on the project's anticipated construction schedule and BAAQMD guidance; upon completion of construction of the proposed project, construction-related emissions of TACs would cease.

This HRA analysis used the Lakes Environmental American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) View model (version 10.2.1) and California Air Resource Board (CARB)'s Hotspots Analysis and Reporting Program (HARP2) risk analysis tool to determine where the proposed project's MEI receptor. The MEI receptor is located at the Burlingame Skilled Nursing building, 720 feet south of the project site. Construction activity would result in an excess cancer risk of approximately 3.28 in one million at the MEI receptor, which does not exceed BAAQMD's recommended cancer risk criteria of ten in one million (BAAQMD 2017a).

Potential chronic (non-carcinogenic) health risk for the MEI receptor was determined to be below the BAAQMD health risk threshold of a hazard index of 1. Construction activities associated with the proposed project would result in a chronic hazard index of approximately <0.002 at the MEI receptor. In addition, the PM_{2.5} concentrations at the MEI receptor would be below BAAQMD's project-level threshold of 0.3 micrograms per cubic meter (µg/m³) with 0.009 µg/m³. Neither DPM nor PM_{2.5} is associated with acute health risks (Office of Environmental Health Hazard Assessment [OEHHA] 2019) therefore, acute risk was not evaluated.

Finally, health risks generated by project construction and existing sources within 1,000 feet of the MEI receptor were compared to BAAQMD's cumulative health risk thresholds. Based on the analysis contained herein, cumulative health risks at the MEI receptor would not exceed BAAQMD's cumulative health risk thresholds for cancer risk, chronic risk, and PM_{2.5}. The MEI receptor would be exposed to a cumulative cancer risk of 33 in one million, below the 100 in one million cancer risk cumulative threshold. In addition, the MEI receptor would be exposed with a cumulative chronic risk of <0.004, below the cumulative chronic hazard risk of 10, and a cumulative PM_{2.5} of 0.25 µg/m³, below the cumulative threshold of 0.8 µg/m³. Moreover, cumulative health risks at the Pinedera and Gateway at Millbrae Apartments were analyzed, and the maximum cancer risk, chronic risk, and PM_{2.5} would be 61 in one million, <0.01, and 0.58 µg/m³, respectively. Therefore, the TAC emissions generated by construction activities would be less than significant.

1.3 Project Site and Description

1.3.1 Project Location

The project site is located at 1855-1881 Rollins Road, Burlingame, within the northern part of the City of Burlingame, San Mateo County. The 4.993 acre site includes three adjacent parcels, located east of Rollins Road, north of Broderick Road, and within the North Rollins Road Mixed-Use District. The site is bounded east by Rollins Road, west by the Caltrain tracks, south by Broderick Road, and between Adrian and Broderick Road along Rollins Road. Currently, the project site is developed with three one-story industrial buildings occupied by a moving company, tile store, community theater group, catering company, and basketball training facility. The project site is located in City's Industrial Innovation land use zone and is surrounded by office/warehouse, commercial recreation, and industrial uses. The proposed project site is located approximately 0.5 miles southeast of the Millbrae Transit Center and 0.75 miles south of the San Francisco International Airport. Figure 1 shows the regional location of the site, and Figure 2 shows the project site location in its local context.

Figure 2 Project Site



1.3.2 Project Description

The proposed project would involve construction of a five-story building comprising 420 residential units, and a 6-level parking structure. Project construction would begin in April 2023 and would be completed in February 2025. Construction activities would include demolishing approximately 125,000 square feet of existing on-site structures, site grading, excavation for building foundations, concrete work, framing, and interior and exterior architectural coatings. Project construction would employ equipment such as backhoes, dozers, and excavators. In addition, the project would require lateral connections to sanitary sewer lines in the public right-of-way along Rollins Road and Broderick Road, along with new connections to water, electricity, and gas lines. During site preparation, 9,700 cubic yards of fill would be imported. The project would require 1,100 cement truck round-trips and the importation of 900 cubic yards of asphalt. In addition, based on the Construction Air Quality Letter Report, 569 hauling trips are estimated during the demolition phase of construction. Construction activities would occur during daytime hours from 7:00 a.m. and 7:00 p.m. with written notice, pursuant to Chapter 18.07.110 Section 305.1 of the Burlingame Municipal Code.

2 Air Quality Background

2.1 Local Climate and Meteorology

The City of Burlingame is located in the central portion of the San Francisco Bay Area Air Basin (SFBAAB), and the proximity to the Pacific Ocean and San Francisco Bay influence the climate in the city and surrounding region. San Francisco International Airport provides the nearest meteorological data, approximately 0.75 miles from the project site. The annual high temperature is approximately 78 degrees Fahrenheit (°F), while the annual low temperature is approximately 43°F from 1990 to 2022. The average temperature is 59°F, and the average annual precipitation is 19 inches (National Oceanic and Atmospheric Administration 2022). Winds play a prominent role in controlling the climate in the area, and annual average winds range between five and ten miles per hour in this region (BAAQMD 2017b).

2.2 Toxic Air Contaminants

A TAC is a substance CARB has determined to have the potential to cause serious health effects. TACs tend to be localized and are found in relatively low concentrations in ambient air; however, exposure to low concentrations over long periods can result in increased risk of cancer and/or adverse health effects. This analysis focuses on DPM as the primary source of TACs associated with construction activities, specifically DPM resulting from on-site operation of diesel-fueled heavy equipment, as well as PM_{2.5} generated by both exhaust and fugitive sources.

2.2.1 Particulate Matter

Fine particulates are generally associated with combustion processes and form in the atmosphere as a secondary pollutant through chemical reactions. PM₁₀ (particulate matter measuring no more than 10 microns in diameter) is a by-product of fuel combustion and wind erosion of soil and unpaved roads (dust), and it is directly emitted into the atmosphere through these processes. Chemical reactions in the atmosphere also create PM₁₀. Very fine particulate matter, or PM_{2.5} (particulate matter measuring no more than 2.5 microns in diameter), is a class of suspended particulates that can be generated by dust, but is more commonly associated with combustion processes. Fine and very fine particulate matter poses a serious health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the fine particulate matter that is inhaled into the lungs remains there, which can cause permanent lung damage. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an adsorbed toxic substance.

Diesel engine fuel combustion forms an important fraction of the particulate matter emission inventory statewide, as particulates in diesel emissions are very small and readily respirable. The particles have hundreds of chemicals adsorbed onto their surfaces, including many known or suspected mutagens and carcinogens. OEHHA reviewed and evaluated the potential for diesel exhaust to affect human health, and the associated scientific uncertainties (CARB 2015). Based on the available scientific evidence, it was determined that a level of DPM exposure, below which no carcinogenic effects are anticipated, has not been identified. The Scientific Review Panel that approved the OEHHA report determined that, based on studies to date, $3 \times 10^{-4} \mu\text{g}/\text{m}^3$ is a

reasonable estimate of the unit risk for DPM. This means that a person exposed to a DPM concentration of $1 \mu\text{g}/\text{m}^3$ continuously over the course of a lifetime has a 3 per 10,000 chance (or 300 in one million chance) of contracting cancer due to this exposure. Based on an estimated year 2000 statewide average concentration of $1.26 \mu\text{g}/\text{m}^3$ for indoor and outdoor ambient air, about 380 excess cancers per one million population could be expected if DPM concentrations remained the same (CARB 2000). Therefore, these particulate emissions have been determined by CARB to be a TAC. The proposed project site is located in a zip code with a cancer risk estimated between 100-150 per one million (BAAQMD 2014).

DPM emissions are estimated to be responsible for about 70 percent of the total ambient air toxics risk (CARB 2000). In addition to these general risks, DPM can also be responsible for elevated localized or near-source exposures (“hot-spots”). Depending on the activity and nearness to receptors, these potential risks can range from small to 1,500 potential cancer cases per million people or more (CARB 2000).

2.3 Air Quality Regulation

Federal and state governments have established ambient air quality standards for the protection of public health. United States Environmental Protection Agency (U.S. EPA) is the federal agency designated to administer air quality regulation, while CARB is the state equivalent in the California Environmental Protection Agency (CalEPA). County-level or regional Air Quality Management Districts (AQMDs) provide local management of air quality. CARB has established air quality standards and is responsible for the control of mobile emission sources, while the local AQMDs are responsible for enforcing standards and regulating stationary sources. BAAQMD is the designated air quality control agency in the SFBAAB.

Because some communities in the Bay Area experience relatively high exposure to TACs compared with other communities, the BAAQMD established the Community Air Risk Evaluation program in 2004 to identify impacted communities. The City of Burlingame is not considered an impacted community based on the revised Version 2 of Identifying Areas with Cumulative Impacts from Air Pollution in the San Francisco Bay Area study (BAAQMD 2014). However, BAAQMD’s *CEQA Air Quality Guidelines* include risk and hazard thresholds that are intended to apply to projects that would site new permitted or non-permitted sources in proximity to receptors and for projects that would site new sensitive receptors in proximity to permitted or non-permitted sources of TACs or $\text{PM}_{2.5}$ emissions.

2.4 Sensitive Receptors

Certain population groups are considered more sensitive to air pollution than others, particularly children, the elderly, and acutely ill and chronically ill persons, especially those with cardio-respiratory diseases. According to the BAAQMD CEQA Air Quality Guidelines (2017a), sensitive receptors typically include residences, schools, healthcare facilities, and other live-in housing facilities such as prisons or dormitories. Sensitive receptors nearest to the proposed project include:

- Mixed-use residential approximately 450 feet west of the project site
- Skilled nursing building approximately 720 feet south of the project site
- Assisted living apartment approximately 960 feet south of the project site

In addition, a mixed-use residential building is under construction approximately 835 feet north of the project site between Millbrae Avenue and Rollins Road. This analysis conservatively assumes that mixed-use residential building would be operational upon the project's construction start date. Furthermore, the proposed project would introduce new sensitive receptors to the area through the introduction of multi-family residential units on the project site.

3 Impact Analysis

3.1 Methodology

The analysis contained herein was conducted in accordance with BAAQMD and OEHHA recommended procedures. The following sections describe the emissions calculations, air dispersion modeling, and risk assessment methodology.

The OEHHA Guidance includes the sensitivity of children to TAC emissions, different breathing rates, and time spent at home in the determination of potential risk. Children have a higher breathing rate compared to adults and would likely spend more time at home resulting in longer exposure durations.

There is a level of uncertainty in assessing health risks and impacts which depends on the availability of data and the extent to which assumptions are relied upon in cases where the data are incomplete or unknown. HRAs rely on scientific studies to reduce the level of uncertainty, but it is not possible to eliminate uncertainty from the analysis. When assumptions are substituted for incomplete or unknown data, standard practice in performing health risk assessments errs on the conservative side of health protection to avoid underestimating or underreporting the potential risk to the public. Sources of uncertainty that may lead to an overestimation or an underestimation of the risk include extrapolation of the toxicity data associated with animal exposure used to estimate exposure effects in humans and uncertainty in the exposure estimates. In addition to uncertainty, there is a natural range or variability in some measured parameters that defining an exposure scenario. The greatest variable among the human population is in properties such as height, weight, food consumption, breathing rates, and susceptibility to chemical toxicants. Therefore, it is typical to err on the side of health protection by assessing risk on the most sensitive populations, such as children and the elderly, and modeling potential impacts based on high-end breathing rates, incorporating age sensitivity factors (ASFs), and not including mechanical air filtration systems which reduces exposure.

3.1.1 Air Dispersion Modeling

Site-specific air dispersion modeling was conducted using the Lakes Environmental American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) View model (version 10.2.1). Dispersion modeling was used to characterize DPM emissions and ground-level concentrations associated with on-site construction activities over the approximately 22-month construction period.

Emissions Calculations and Source Modeling

Emissions rates for input to AERMOD were based on anticipated annual emissions modeled using the California Emissions Estimator Model (CalEEMod) version 2020.4.0. CalEEMod emissions estimates were included in the air quality analysis letter report for the project. CalEEMod was developed for use throughout the state in estimating construction and operational emissions from land use development. CalEEMod differentiates between particulate matter emitted from engine exhaust (i.e., DPM) and particulate matter emitted from ground disturbing activities (i.e., fugitive dust, which does not constitute DPM) (California Air Pollution Control Officers Association [CAPCOA])

2021). DPM concentration was estimated based on the PM₁₀ exhaust emissions (not including fugitive PM₁₀) provided by CalEEMod, which are DPM emissions resulting from combustion of diesel-fueled vehicles and off-road equipment during construction. In addition, PM_{2.5} emissions from both engine exhaust and fugitive sources were multiplied by AERMOD average concentration output to determine ground-level concentrations at nearby receptors for comparison to BAAQMD's PM_{2.5} concentration thresholds.

As described in Section 1.3.2, Project Description, project construction would last approximately 22 months, beginning in April 2023 and concluding in February 2025. Table 1 summarizes the approximate construction schedule used in CalEEMod prepared as part of the air quality analysis (Rincon Consultants 2022).

Table 1 Anticipated Construction Schedule

Construction Activity	Start (month/year)	Finish (month/year)	Duration (days)
Demolition	April 2023	May 2023	21
Site Preparation	May 2023	June 2023	45
Grading	June 2023	August 2023	43
Building Construction	August 2023	June 2024	215
Architectural Coatings	May 2024	February 2025	193
Paving	December 2024	February 2025	43

Note: This table includes an estimated construction schedule and is subject to change.

Source: Rincon Consultants 2022.

Project construction would involve demolition of approximately 125,000-square feet of existing building material, such as the moving company, tile store, community theater group, catering company, and basketball training facility. Additionally, approximately 9,700 cubic yards of fill would be imported to the site. Based on the CalEEMod run for the project, hauling of demolition debris would result in approximately 569 truck trips in total, while importing of fill material would require approximately 1,213 haul trips—approximately 28 trips per day when averaged over the approximately 43-day site preparation phase. The default CalEEMod assumption for haul length were used, which is approximately 20 miles in length per haul trip.

Annual and maximum hourly emissions were calculated by using the annual emissions reported by CalEEMod for each year of construction, and averaging the emissions over the three-year construction exposure duration assumed for the project (refer to Section 3.1.2, *Risk Analysis*, below). Hourly emissions were determined based on the anticipated 560 total days of construction and an assumed 12-hour construction work day. Table 2 summarizes annual and hourly emissions for DPM and PM_{2.5} used for this analysis.

Table 2 Annual and Hourly Construction Emissions

	Annual Construction Emissions (lbs/year) ¹	Max Hourly Construction Emissions (lbs/hour) ²
DPM ³	97.1	0.088
PM _{2.5} ⁴	100.1	0.178

DPM = diesel particulate matter; PM_{2.5} = particulate matter less than 2.5 microns in diameter

¹Based on annual construction emissions, averaged over the assumed three-year exposure duration.

²Assumes approximately an 12-hour work day.

³Based on PM₁₀ exhaust emissions.

⁴Includes both exhaust and fugitive emissions.

Source: Appendix A.

The construction site was modeled as an area source in AERMOD with an assumed release height of 10 feet (approximately 3.05 meters), corresponding to the approximate height of off-road equipment mufflers from which exhaust emissions would be released. For all emissions sources, AERMOD's variable emissions rate function was applied, based on construction activity to occur Monday through Friday between 7 a.m. to 7 p.m. This construction duration is consistent with equipment use rate assumptions in CalEEMod, and the construction hours were modeled to extend beyond current City of Burlingame Municipal Code restrictive hours (8 a.m. to 7 p.m) for the anticipation of certain concrete pours, as permitted by the Municipal Code with written approval from the building official.

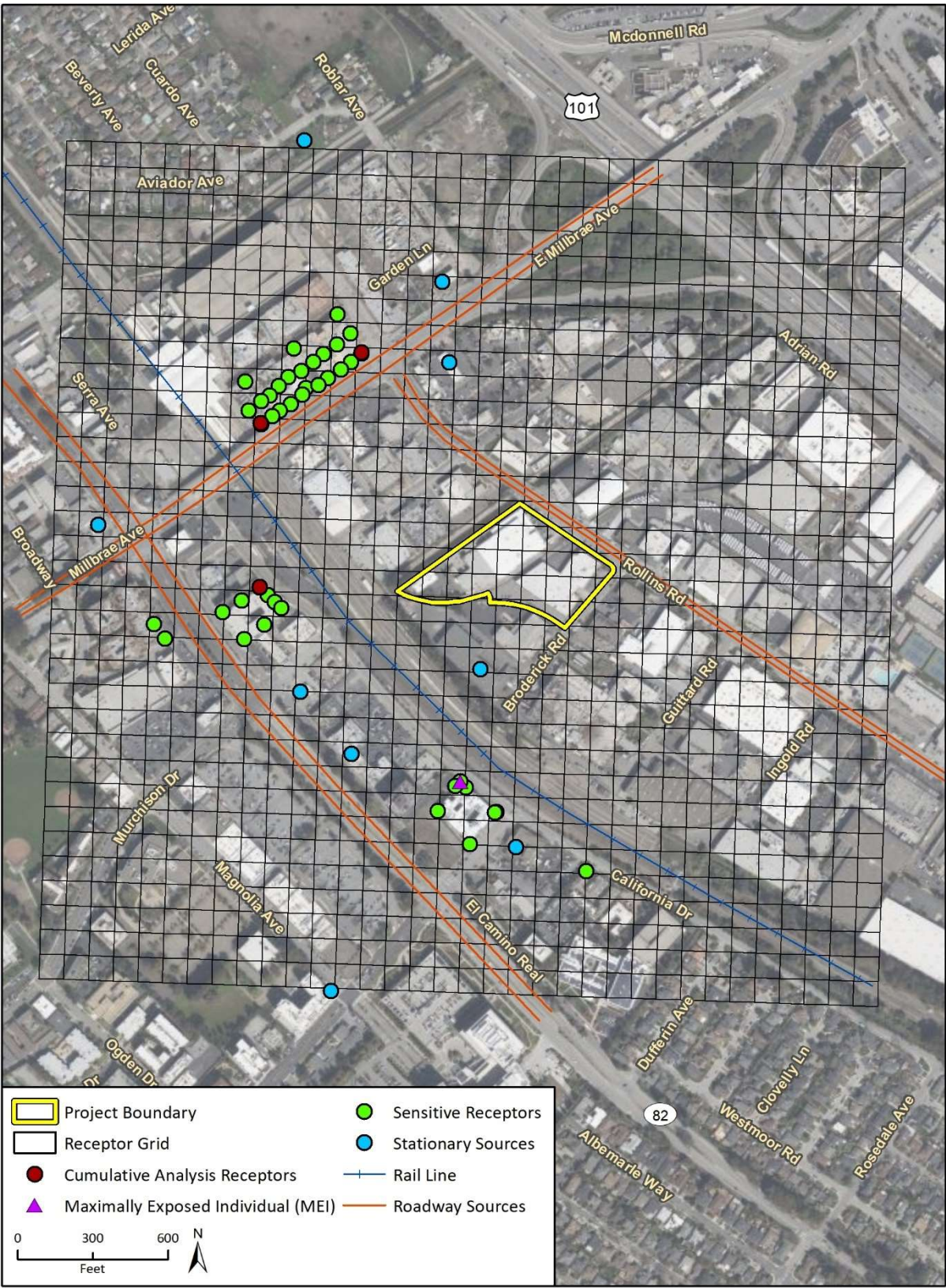
Receptors

To characterize health risk at nearby sensitive receptors, 61 existing residential and skilled nursing sensitive receptors were selected in AERMOD. Sensitive receptors were selected at mixed-use residential units approximately 450 feet west and 835 feet northwest of the project site. The skilled nursing building and assisted living apartments are approximately 720 and 960 feet south of the project site. Receptors were conservatively placed at the edges of the existing structures. The nearest sensitive receptors to the project site are mixed-use buildings, with commercial uses on the ground floor and residential units on each subsequent floor. The nearest sensitive receptors, Pinedera Apartments, was sited at the edge of the mixed-use building and located on the second floor (ground level plus 6.1 meters), third floor (second floor level plus 6.1 meters), and fourth floor (third floor plus 6.1 meters), as appropriate. The Gateway at Millbrae Station mixed-use building's site plan indicates residential units would be placed from the second floor through the sixth floor. The second floor is approximately 8.3 meters from the ground level, and each subsequent floor are approximately 3.3 meters from the floor level below. The ground floor of the Burlingame Skilled Nursing building consists of garage parking spaces. Therefore, sensitive receptors representing the skilled nursing building were placed on the second floor (ground floor plus 3.048 meters) and the third floor (first floor plus 3.048 meters). The Mills Estate Villa assisted living apartments were sited at the edge of the building at the ground level.

A 30-point by 30-point grid with 35-meter spacing was placed over the project site and surrounding vicinity. The receptor grid ensures proper coverage throughout the surrounding area to verify and locate the MEI receptor within 1,000 feet of the project site boundary. In addition, the receptor grid increases the sample size of receptor locations and provides a better representation of the overall exposure pattern throughout the area. Accounting for the residential, skilled nursing, and grid receptors, this analysis evaluated health risk at 961 receptor locations. Emissions sources (project

construction, roadways, and rail lines) and receptors (MEI receptor, cumulative analysis receptors, and sensitive receptors), including receptor grid areas, are shown in Figure 3.

Figure 3 Map of Sources and Receptors



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Fig. 3 Sources and Receptors Map

Additional Dispersion Modeling Parameters and Data Sources

AERMOD was utilized to calculate the concentrations of source emissions at receptor locations. AERMOD is a steady-state, multiple-source, Gaussian dispersion model designed for use with emission sources situated in terrain where ground elevations can exceed the stack heights of the emission sources. The AERMOD model requires hourly meteorological data consisting of wind vector, wind speed, temperature, stability class, and mixing height. Specific meteorology and terrain for the site were input to the model using the nearest available meteorological data set, San Francisco International Airport (approximately 0.75 miles north of the project site), and 30-meter Digital Elevation Model (DEM) data for the Montara Mountain Quadrangle. AERMOD's urban option was applied using the most recent U.S. Census Bureau population estimate for San Mateo County, to capture the urban heat island of adjacent urban areas (U.S. Census Bureau 2021).

The presence of buildings and other structures disturbs downwind air flow. However, building downwash is only calculated for point sources and not appropriate to include in AERMOD for this HRA because there are no point sources in the analysis. Flagpole height of 4.9 feet (1.5 meters) was applied (BAAQMD 2020). AERMOD provides the concentration estimated by the air quality model based on an emission rate of one gram per second (BAAQMD 2020).

3.1.2 Risk Analysis

Version 2.1.5 of the CARB's HARP 2 was used to calculate the potential risk values associated with the worst case one-hour and average annual toxic emission concentrations at surrounding receptors. Risk was assessed by including all mandatory minimum pathways and using the OEHHA Derived Method in the risk analysis. BAAQMD recommends that the cancer risk be evaluated assuming that the average daily dose for short-term exposure lasts a minimum of three years for projects lasting three years or less. Therefore, since the project construction would last approximately 22 months, the health risk assumed an exposure duration of three years, consistent with recommendations in BAAQMD recommendations (BAAQMD 2016). Following completion of construction of the proposed project, construction emissions would cease.

3.1.3 Cumulative Analysis

The cumulative impact of the mitigated project was further assessed by evaluating all current and proposed substantial sources of TACs within 1,000 feet of the identified construction MEI and clustered areas of sensitive receptors. These clustered areas are the Pinedera and Gateway at Millbrae Station Apartments west and northwest of the project site. Roadway and rail sources within 1,000 feet of the construction MEI, Gateway at Millbrae Station, and Pinedera Apartment sensitive receptors includes Millbrae Avenue, El Camino Real, Rollins Road, and the Caltrans Rail line. The stationary source of the MEI receptor includes six permitted stationary sources, such as gas dispensing facilities, generators, and a permitted facility. The stationary sources within 1,000 feet from the Gateway at Millbrae Station and Pinedera Apartments include four to five permitted stationary sources, such as gas dispensing facilities and generators.

Cumulative risk impacts to the MEI from these sources were estimated as described below following BAAQMD's *CEQA Air Quality Guidelines* (BAAQMD 2017a).

Roadway TAC Impacts

Millbrae Avenue, El Camino Real, and Rollins Road are considered significant sources of mobile TAC emissions due to the high level of daily traffic (i.e., greater than 10,000 average daily trips [ADT]) (Hexagon Transportation Consultants, Inc. 2018). Health risk at the MEI, Gateway at Millbrae Apartments, and Pinedera Apartments sensitive receptors from Millbrae Avenue, El Camino Real, and Rollins Road was based on cancer risk and PM_{2.5} concentrations obtained from raster data files of health risks associated with major roadways and highways provided by BAAQMD (BAAQMD 2022a and 2022b).

Railroad TAC Impacts

Caltrain rail lines serving diesel fueled passenger and freight locomotives are located approximately 130 feet north of the MEI receptor. Although Caltrain is in the process of converting the fleet from diesel powered to a mixed fuel, the BAAQMD provided health risk and PM_{2.5} values are conservatively based on 2014 data and an all diesel fleet. The BAAQMD modeled health risk, and PM_{2.5} values were gathered from the raster files for the MEI, Gateway at Millbrae Apartments, and Pinedera Apartments' receptor locations. (BAAQMD 2022c).

Stationary Source TAC Impacts

The BAAQMD's *Permitted Stationary Sources Risk and Hazards* website was used to obtain the screening level health risk and PM_{2.5} values associated with permitted stationary sources within 1,000 feet of the MEI receptor, Gateway at Millbrae Apartments, and Pinedera Apartment sensitive receptors. The MEI receptor is within 1,000 feet of six stationary sources which include, two gas dispensing facilities, three generators, and one permitted facility. The Burlingame Long Term Care Center (Facility ID 22057), the highest cancer risk with 1,000 feet, is located within the building of the MEI receptor location, and approximately 185 feet east of the MEI receptor. The Gateway at Millbrae Apartments are within 1,000 feet of four stationary sources, and the Pinedera Apartments are within 1,000 feet of five stationary sources, including gas dispensing facilities and generators. Burlingame 76 gas station (Facility ID 111992), the highest cancer risk within 1,000 feet, is located approximately 450 feet south of Pinedera Apartments' sensitive receptor. The Chevron gas station (Facility ID 109048), the highest cancer risk within 1,000 feet, is located 910 and 420 feet southwest of the ends of the Gateway at Millbrae Apartments sensitive receptor. Table 3 list the stationary sources included in the project analysis.

Table 3 Stationary Sources within 1,000 Feet of Receptor

Stationary Source	Address	Facility ID
Maximally Exposed Individual		
World Journal SF, LLC -Permitted Facility	231 Adrian Road, Millbrae, CA	7911
City of Burlingame- Generator	1111 Trousdale Drive, Burlingame, CA	F 14472
Burlingame Long Term Care Center-Generator	1100 Trousdale Drive, Burlingame, CA	22057
Bay Area Vein & Vascular Center-Generator	1850 El Camino Real, Burlingame, CA	22604
Burlingame Police Station- Gas Dispensing Facility	1111 Trousdale Dr, Burlingame, CA	110750
Burlingame 76- Gas Dispensing Facility	1876 El Camino Real, Burlingame, CA	111992
Cumulative Analysis Receptors		
World Journal SF, LLC- Permitted Facility	231 Adrian Road, Millbrae, CA	7911
Bay Area Vein & Vascular Center-Generator	1850 El Camino Real, Burlingame, CA	22604
Burlingame 76- Gas Dispensing Facility	1876 El Camino Real, Burlingame, CA	111992
City of Millbrae Generator	190 Aviator Avenue, Millbrae, CA	14418
S.F. Bay Area Rapid Transit District-Generator	200 Rollins Road, Millbrae, CA	15487
Chervron #0206 – Gas Dispensing Facility	320 Millbrae Avenue, Millbrae, CA	109048
ARCO SS #07119- Gas Dispensing Facility	1 Rollins Road, Millbrae, CA	111968
76 Products Co SS #3676	5 El Camino Real	111854

3.2 Significance Thresholds

Depending on the risk levels, emitting facilities are required to implement varying levels of risk reduction measures. BAAQMD strongly recommends that impacted communities develop and adopt Community Risk Reduction Plan. The City of Burlingame is not identified as an impacted community, therefore has not developed and adopted a Community Risk Reduction Plan. In the absence of a qualified Community Risk Reduction Plan, BAAQMD has established the following thresholds of significance for local community risks and hazards associated with TACs and PM_{2.5} for assessing individual project-level impacts at a local level (BAAQMD 2017a):

- Not to exceed an increased cancer risk of >10 in one million
- Not to exceed increased non-cancer (i.e., Chronic or Acute) risk of >1.0 Hazard Index
- Not to exceed ambient PM_{2.5} concentration increase >0.3 µg/m³ annual average

A project would have a cumulatively considerable impact if the aggregate total of current and proposed TAC sources within a 1,000 feet radius of the project fence line in addition to the proposed project would exceed the following thresholds of significance:

- Not to exceed an increased cancer risk of >100 in one million
- Not to exceed increased non-cancer (i.e., Chronic or Acute) risk of >10 Hazard Index
- Not to exceed ambient PM_{2.5} concentration increase >0.8 µg/m³ annual average

To provide a perspective on risk, the American Cancer Society (2018) reports that in the United States, men have about a 40 in 100 chance (0.40 probability) and women about a 38 in 100 chance (0.38) of developing cancer during a lifetime. Based on this background cancer risk level in the general population, application of a 1.0×10^{-5} excess risk limit means that the contribution from a toxic hazard should not cause the resultant cancer risk for the exposed population to exceed 0.40001 for men or 0.38001 for women. Neither DPM nor PM_{2.5} is associated with acute health risks (OEHHA 2019); therefore, acute risk was not evaluated.

3.3 Results

3.3.1 Construction Risk Analysis Results

Maximum cancer risks associated with project construction are shown in Table 4. The MEI is the receptor experiencing the highest incremental excess cancer risk under the total exposure duration (three years). The MEI receptor was determined through an iterative process evaluating potential receptors based on model-generated risk contours to ensure the maximum incremental excess cancer risk is captured (refer to Appendix B for model results). The MEI was determined to be located at the skilled nursing building approximately 720 feet south of the project site. The MEI receptor is shown in Figure 3. As shown in Table 4, incremental excess cancer risks resulting from construction activities would not exceed BAAQMD thresholds.

Table 4 Health Risks Associated with Construction Activity at MEI

Scenario	Excess Cancer Risk (per million)	Chronic Health Risk ¹	PM _{2.5} µg/m ³ annual average
Maximally Exposed Individual (MEI)	3.28	<0.002	0.009
BAAQMD Significance Threshold	>10	>1	>0.3
Threshold Exceeded?	No	No	No

µg/m³ = micrograms per cubic meter; BAAQMD = Bay Area Air Quality Management District

¹Noncancer health impacts are determined by dividing the airborne concentration at the receptor by the appropriate Reference Exposure Level (REL) for that substance. A REL is defined as the concentration at which no adverse noncancer health effects are anticipated. Because noncancer health impacts are assessed as the ratio of airborne concentration versus the REL, the resulting hazard index is unitless.

For HARP model outputs, see Appendix B.

As shown in Table 4, the chronic hazard index at the MEI would be less than one. The incremental excess cancer risk due to DPM exposure during the three-year exposure duration at the MEI receptor would not exceed the project-level significance threshold of ten in one million. Additionally, ground-level PM_{2.5} concentrations at the MEI receptor do not exceed the project-level significance threshold of 0.3 µg/m³. The analysis provides an conservative health risk estimate as the applicant provided specific construction details, and the CalEEMod emission estimates were used in

the analysis. The project would not exceed BAAQMD's community risk and hazards threshold. Therefore, the project's construction health risk impacts would be less than significant.

3.3.2 Cumulative Risk Analysis

Construction-related health risk, as well as health risk from existing major roadways, highways, rail, and stationary sources within 1,000 feet of the MEI, is summarized in Table 5. As shown in Table 5, cumulative sources would not exceed BAAQMD's thresholds. The MEI receptor would be exposed to a cumulative cancer risk of 33 in one million, which is below the 100 in one million cancer risk cumulative threshold. In addition, the MEI receptor would be exposed with a cumulative chronic risk of <0.004, which is below the cumulative chronic hazard risk of 10, and a cumulative PM_{2.5} of 0.25 µg/m³, which is below the cumulative threshold of 0.8 µg/m³. Therefore, the health risk to nearby residents due to cumulative impacts would be less than significant.

Table 5 Cumulative Health Risks Associated with Construction Activity at MEI

Source	Excess Cancer Risk (per million)	Chronic Health Risk ¹	PM _{2.5} µg/m ³ Annual Average
Maximally Exposed Individual			
Project Construction	3.28	0.00172	0.009
Highways ^{2,5}	7.35	N/A	0.182
Major Streets ^{3,5}	0.65	N/A	0.0167
Railroad ^{4,5}	19.84	N/A	0.0381
World Journal SF, LLC (Facility ID 7911)	0	0	0
City of Burlingame (Facility ID 14472)	0.08	0	0
Burlingame Long Term Care Center (Facility ID 22057)	0.64	0	0
Bay Area Vein & Vascular Center (Facility ID 22604)	0.6	0	0.0015
Burlingame Police Station (Facility ID 110750)	0.044	0	0
Burlingame 76 (Facility ID 111992)	0.55	0.0025	0
Cumulative Total	33	.00422	0.25
BAAQMD Significance Threshold	>100	>10	>0.8
Threshold Exceeded?	No	No	No

¹Noncancer health impacts are determined by dividing the airborne concentration at the receptor by the appropriate Reference Exposure Level (REL) for that substance. A REL is defined as the concentration at which no adverse noncancer health effects are anticipated. Because noncancer health impacts are assessed as the ratio of airborne concentration versus the REL, the resulting hazard index is unitless.

²Based on health risk raster data for Highways provided by BAAQMD (BAAQMD 2022a).

³Based on health risk raster data for Major Streets provided by BAAQMD (BAAQMD 2022b).

⁴Based on health risk raster data for Rail provided by BAAQMD (BAAQMD 2022c).

⁵BAAQMD Highway, Major Streets, and Rail raster files do not provide a chronic health risk value for these sources.

For Assumptions and Calculations, see Appendix A. For model outputs, see Appendix B.

Table 6 summarizes the health risk from existing major roadways, highways, rail, and stationary sources within 1,000 feet of the Gateway at Millbrae and Pinedera Apartments. As shown in Table 6, cumulative sources would not exceed BAAQMD's thresholds. The sensitive receptors would be exposed to a maximum cumulative cancer risk of 61 in one million, which is below the 100 in one

million cancer risk cumulative threshold. In addition, the the sensitive receptors would be exposed with a maximum cumulative chronic risk of 0.05, which is below the cumulative chronic hazard risk of 10, and a cumulative PM_{2.5} of 0.58 µg/m³, which is below the cumulative threshold of 0.8 µg/m³. Therefore, the health risk to nearby residents due to cumulative impacts would be less than significant.

Table 6 Cumulative Health Risks Associated with Construction Activity Pinedera and Gateway at Millbrae Apartments

Source	Excess Cancer Risk (per million)	Chronic Health Risk ¹	PM _{2.5} µg/m ³ Annual Average
Pinedera Apartments			
Project Construction	1.34	<0.001	0.005
Highways	7.48	N/A	0.187
Major Streets	1.54	N/A	0.039
Railroad	18.09	N/A	0.035
Stationary Sources	2.09	0.008	0.001
Cumulative Total	30.5	0.009	0.27
Gateway at Millbrae Apartments 1			
Project Construction	1.13	<0.001	0.003
Highways	7.61	N/A	0.18
Major Streets	12.54	N/A	0.321
Railroad	36.62	N/A	0.07
Stationary Sources	3.18	0.013	0.001
Cumulative Total	61.1	0.014	0.58
Gateway at Millbrae Apartments 2			
Project Construction	1.25	0.01	0.004
Highways	7.44	N/A	0.178
Major Streets	6.66	N/A	0.17
Railroad	28.55	N/A	0.055
Stationary Source	9.42	0.039	0.0013
Cumulative Total	53.3	.046	0.41
BAAQMD Significance Threshold	>100	>10	>0.8
Threshold Exceeded?	No	No	No

¹Noncancer health impacts are determined by dividing the airborne concentration at the receptor by the appropriate Reference Exposure Level (REL) for that substance. A REL is defined as the concentration at which no adverse noncancer health effects are anticipated. Because noncancer health impacts are assessed as the ratio of airborne concentration versus the REL, the resulting hazard index is unitless.

²Based on health risk raster data for Highways provided by BAAQMD (BAAQMD 2022a).

³Based on health risk raster data for Major Streets provided by BAAQMD (BAAQMD 2022b).

⁴Based on health risk raster data for Rail provided by BAAQMD (BAAQMD 2022c).

⁵BAAQMD Highway, Major Streets, and Rail raster files do not provide a chronic health risk value for these sources.

For Assumptions and Calculations, see Appendix A. For model outputs, see Appendix B.

4 Conclusions

Construction of the proposed project would not expose nearby sensitive receptors to significant excess cancer or non-carcinogenic chronic health risks associated with DPM, or PM_{2.5} concentrations in excess of BAAQMD health risk criteria. The analysis contained herein was conducted in accordance with BAAQMD and OEHHA recommended procedures. The analysis conservatively employs a three year exposure duration, consistent with BAAQMD guidance (BAAQMD 2016). However, total project construction—including demolition, site preparation, and building construction—would be anticipated to occur over approximately 22 months, resulting in a reduction in exposure to construction-generated TACs compared to the modeled results.

The project's MEI receptor is located at the Burlingame Skilled Nursing building, 720 feet south of the project site. Construction activity would result in an excess cancer risk of approximately 3.28 in one million at the MEI receptor, which does not exceed BAAQMD's recommended cancer risk criteria of ten in one million (BAAQMD 2017a). Potential chronic (non-carcinogenic) health risks for the MEI receptor was determined to be below the BAAQMD health risk threshold of a hazard index of 1. Construction activities associated with the proposed project would result in a chronic hazard index of approximately <0.002 at the MEI receptor. In addition, the PM_{2.5} concentrations at the MEI receptor would be below BAAQMD's project-level threshold of 0.3 micrograms per cubic meter (µg/m³) with 0.009 µg/m³. Therefore, project construction would not exceed BAAQMD's cancer, hazard, and PM_{2.5} risk threshold.

The health risks generated by the project and existing sources within 1,000 feet of the MEI receptor were compared to BAAQMD's cumulative health risk thresholds. Based on the analysis contained herein, cumulative health risks at the MEI receptor would not exceed BAAQMD's cumulative health risk thresholds for cancer risk, chronic risk, and PM_{2.5}. Roadway, highway, and railroad risk data was provided by BAAQMD in raster files. The raster files contained numerical health risk data for each coordinate point, and were based on the distance from the source. Health risk data from stationary sources was obtained from BAAQMD's *Permitted Stationary Sources Risk and Hazards* website and were refined using BAAQMD's Distance Multiplier Calculator. The MEI receptor would be exposed to a cumulative cancer risk of 33 in one million, below the 100 in one million cancer risk cumulative threshold. In addition, the MEI receptor would be exposed with a cumulative chronic risk of <0.004, below the cumulative chronic hazard risk of 10, and a cumulative PM_{2.5} of 0.25 µg/m³, below the cumulative threshold of 0.8 µg/m³. Additional sensitive receptors were evaluated for cumulative health risk to represent the cumulative health impacts near the project area. The health risks at the Pinedera and Gateway at Millbrae Apartments were analyzed, and the maximum cancer risk, chronic risk, and PM_{2.5} would be 61 in one million, <0.01, and 0.58 µg/m³, respectively. Therefore, the TAC emissions generated by construction activities would be less than significant.

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