



JULY  
2020

# 128 Lorton Avenue Project

CEQA Class 32 Infill Exemption

City of Burlingame





# **CEQA CLASS 32 INFILL EXEMPTION 128 LORTON AVENUE PROJECT**

## **PREPARED FOR:**

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## Acronyms and Abbreviations

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2040 General Plan	Envision Burlingame
AERMOD	Air Quality Dispersion Modeling
APN	assessor's parcel number
ASTM	American Society for Testing and Materials
BAAQMD	Bay Area Air Quality Management District
Bay	San Francisco Bay
BMPs	best management practices
BPD	Burlingame Police Department
BSD	Burlingame School District
C/CAG	City/County Association of Governments
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAPs	criteria air pollutants
CCFD	Central County Fire Department
CEQA	California Environmental Quality Act
CEQA Guidelines	California Environmental Quality Act Air Quality Guidelines
City	City of Burlingame
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CO	carbon monoxide
CRHR	California Register of Historical Resources
dB	decibel
dba	A-weighted decibel
DPH	Department of Public Health
DPM	diesel particulate matter
DTSC	Department of Toxic Substance Control
DUs	dwelling units
EIR	environmental impact report
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
gpd	gallons per day
gsf	gross square feet
HI	Hazard Index



HRA	health risk assessment
HVAC	heating, ventilation, and air-conditioning
IS/MND	initial study/mitigated negative declaration
L <sub>dn</sub>	day-night level
L <sub>eq</sub>	equivalent sound level
L <sub>max</sub>	maximum sound level
LOS	level of service
MEIR	maximally exposed individual receptor
mgd	million gallons per day
MRP	Municipal Regional Permit
Municipal Code	City of Burlingame Municipal Code
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OEHHA	Office of Environmental Health Hazard Assessment
PM <sub>10</sub>	aerodynamic resistance diameters equal to or less than 10 microns
PM <sub>2.5</sub>	aerodynamic resistance diameters equal to or less than 2.5 microns
PPV	peak particle velocity
Project	128 Lorton Avenue Project
Regional Water Board	Regional Water Quality Control Board
ROGs	reactive organic gases
SamTrans	San Mateo County Transit District
SCAs	Standard Conditions of Approval
sf	square feet
SFBAAB	San Francisco Bay Area Air Basin
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SMUHSD	San Mateo Union High School District
SWRCB	State Water Resources Control Board
TACs	toxic air contaminants
TALK	Teaching and Assessing Language for Kids
TDM	travel demand management
TIA	transportation impact analysis
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
WWTP	wastewater treatment plant
µg/m <sup>3</sup>	micrograms per cubic meter

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## Section 1

# Project Description

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1. **Project Title:**  
128 Lorton Avenue Project
2. **Lead Agency/Sponsor's Name and Address:**  
City of Burlingame  
Planning Division  
501 Primrose Road  
Burlingame, CA 94010
3. **Contact Person and Phone Number:**  
Contact: Ruben Hurin, Planning Manager  
Planning Division  
501 Primrose Road  
Burlingame, CA 94010  
(650) 558-7256
4. **Project Location:**  
128 Lorton Avenue, Burlingame, CA (assessor's parcel number [APN]: 028-231-210)
5. **Project Sponsor's Name and Address:**  
Pacific West Communities  
Attn: Chris Grant  
430 East State Street, Suite 100  
Eagle, ID 83616
6. **General Plan Designation:**  
2040 General Plan – Downtown Specific Plan  
Downtown Specific Plan – R-4 Incentive District
7. **Zoning:**  
R-4 (R-4 Incentive District Subarea)
8. **Requested Permits**
  - Design review for construction of a five-story, 19-unit residential development, with at-grade parking on first floor (City of Burlingame Municipal Code [Municipal Code] Section 25.57).
  - Condominium permit for construction of a residential condominium building.
  - Density bonus to allow development concessions and waivers/modifications to development standards to facilitate the provision of affordable housing (e.g., concessions and waivers/modifications regarding building setback, lot coverage, building height, common open space, private open space, and off-street parking) (Municipal Code Section 25.63).

## Introduction

The 128 Lorton Avenue Project (Project) involves one 0.172-acre site within the Burlingame Downtown Specific Plan area. The site currently includes a 1,350-gross-square-foot (gsf) residential building, a 2,590 gsf residential building, and minimal landscaping. The two structures provide a total of four residential units; both were built in 1912. Upon Project implementation, one new building would be developed with approximately 28,071 gsf of residential space for 19 units and 17 vehicle parking spaces.

## Existing Setting

The Project site is a single lot within the downtown area of the city of Burlingame, approximately 0.3 mile northwest of the Burlingame Caltrain station.<sup>1</sup> The majority of the lot is covered by impervious surfaces in the form of pavement, concrete, and buildings. Vegetation within the parcel is limited to a front lawn area and small decorative shrubs. A small street tree is located between the sidewalk and Lorton Avenue. There are no trees on the Project site. The Project site is bound by public parking to the north and west (Lot N) (a five-level public parking garage is currently under construction); a residential multi-story building to the east; and Lorton Avenue, a multi-story residential building, and another surface parking lot (Lot F) to the south. Figure 1 depicts the location of the Project site.

## Land Use and Zoning

On January 7, 2019, the City of Burlingame (City) adopted Envision Burlingame (2040 General Plan), which updated the previous general plan and identified a vision, goals, policies, and a land use designation that will provide direction through 2040. The 2040 General Plan notes that the land use designation for the Project site is Downtown Specific Plan. Under this designation, permitted uses and development intensities are defined. Therefore, the Downtown Specific Plan continues to serve as a policy document and implementation guide for development and planning decisions in the downtown area. The Downtown Specific Plan sets forth strategies for change as well as regulatory policies to guide and govern future development within downtown Burlingame. The Downtown Specific Plan details proposed land uses and their distribution, infrastructure improvements, development standards, and the implementation measures required to achieve the goals of the plan. The Downtown Specific Plan is consistent with the general land use provisions contained in the 2040 General Plan.

The Project site is entirely within Block 24B of the Downtown Specific Plan, which is also within the R-4 Incentive District planning area. Land uses for this district are predominantly high-density, multi-family residential uses. Areas here are regulated by R-4 zoning standards, consistent with R-4 properties citywide. To encourage high-density residential uses within the R-4 Incentive District, buildings or structures greater than 55 feet in height are allowed with receipt of a conditional use permit, in accordance with Municipal Code Section 25.29.060(f); buildings in excess of 75 feet are not permitted within the R-4 Incentive District.

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<sup>1</sup> For the purposes of this analysis, true north is Project northeast, with Howard Avenue running in a north-south direction and Lorton Avenue running in an east-west direction.







## Project Description

All existing features associated with the Project site would be removed, including the two residential buildings. The Project would include construction of a five-story residential building (56 feet, six inches tall) with 19 residential units, two of which would be affordable (two one-bedroom units) and reserved for moderate-income households. In addition, an enclosed at-grade parking garage on the ground floor would provide 17 vehicle parking spaces using a two-level stacking system.<sup>2</sup> The housing units would include 11 one-bedroom units (675 gsf), seven two-bedroom units (950 to 1,150 gsf), and one three-bedroom unit (1,528 gsf). Figures 2 through 6 provide proposed site plans, elevations, and a rendering.

Given its proximity to a major transit stop (the Burlingame Caltrain station), the applicant would be required to include only 14 parking spaces as part of the Project.<sup>3</sup> Therefore, the 17 parking spaces proposed as part of the Project exceeds the required minimum number of parking spaces. Guests at the proposed building would be expected to use the Lot N parking garage. The parking garage would be accessed from Lorton Avenue. A staircase and elevator would also provide access to the parking area. Refuse storage and electrical rooms would be located in designated areas adjacent to the parking area on the ground floor.

## Building Design and Lighting

The building exterior would consist of cement, stone veneer, plaster trim and cornices, and painted metal awnings. The building would also include glass entry doors, fiberglass-framed windows, and a metal gate at the garage entrance. Balconies would be provided for five of the 19 units; three balconies would be located on the south side of the building (one each on the podium, second, and fourth levels), and two balconies would be located on the west side of the building (on the podium level). The balconies would range in size from 99 to 308 square feet (sf) and would have glass guardrails. Downward-facing security lighting would be installed on the street side of the building. Figures 4, 5, and 6 show what the new building would look like.

The parking garage would front onto Lorton Avenue, which would function as both an ingress and egress point. The parking garage would be screened using design features similar to those on the exterior of the residential floors above.

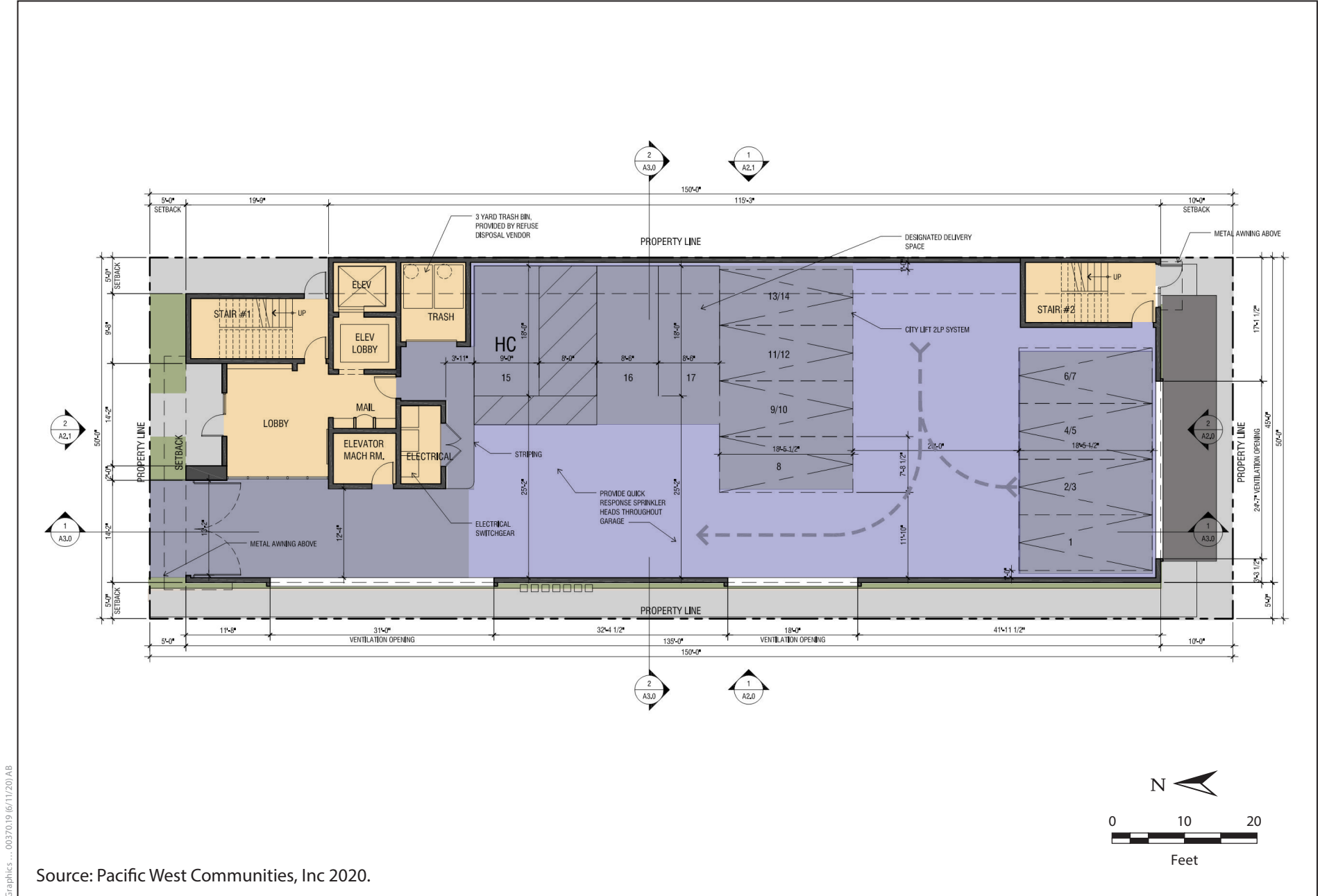
## Landscaping

Although there are no trees on the Project site, one street tree adjacent to Lorton Avenue would be removed and replaced with two new street trees with 24-inch boxes. Overall, the Project would plant four red Japanese laceleaf maple trees (24-inch boxes) as well as a combination of shrubs, perennials, vines, and ground cover throughout the site. The Project would also include flow-through planters that would treat stormwater. The Project would comply with the requirements of the Model Water-Efficient Landscape Ordinance.

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<sup>2</sup> The parking facility would use CityLift Puzzle vehicle stacking system or a similar system, with some parking spaces stacked up to two vehicles high. The system works by maintaining an open space on the first level. This allows each car to be independently accessible from a kiosk.

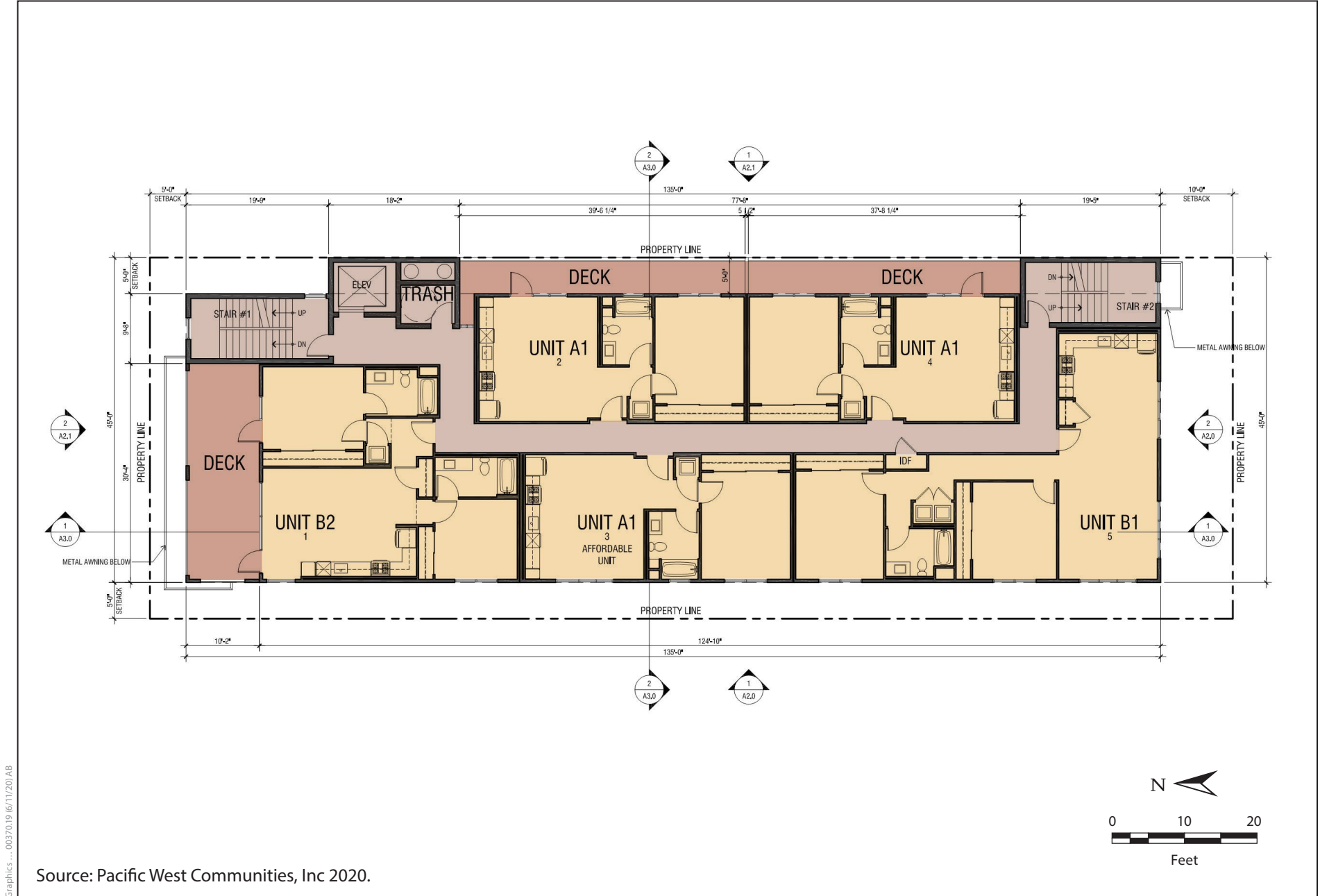
<sup>3</sup> California Government Code Section 65915(p)(2) provides for a reduction in the required vehicular parking ratios of projects within 0.5 mile of a major transit stop. The Project qualifies for a parking ratio of 0.5 parking space per bedroom. The Project is proposing 28 bedroom units. The required number of parking spaces was determined as follows: 14 parking spaces = (28 bedroom units) × (0.5 parking space/bedroom unit).



Source: Pacific West Communities, Inc 2020.



**Figure 2**  
**Site Plan — Ground Level**



Source: Pacific West Communities, Inc 2020.



**Figure 3**  
**Site Plan — Podium Level**



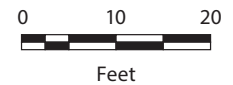


**LORTON AVENUE ELEVATION — SOUTHWEST**

Source: Pacific West Communities, Inc 2020.



LORTON AVENUE ELEVATION — NORTHWEST



Source: Pacific West Communities, Inc 2020.



**LORTON AVE STREET LEVEL VIEW**



**AERIAL VIEW FROM NORTHEAST**

Source: Pacific West Communities, Inc 2020.

The existing site currently includes approximately 1,993 sf of pervious areas. With implementation of the Project, the site would include approximately 423 sf of pervious areas. Overall, the Project would reduce the area of pervious surfaces by approximately 1,570 sf.

## Remediation

Four properties within 0.5 mile of the Project site are identified as hazardous waste cleanup sites, two of which remain active.<sup>4</sup> The two active sites are approximately 500 feet from the Project site, at 1319 Howard Avenue and 1140 Howard Avenue; both are current or former dry cleaning facilities. Halogenated solvents were identified in groundwater at the facilities. The sites are currently undergoing remediation. Monitoring reports do not suggest that contaminated groundwater has encroached upon the Project site. However, contaminated soil vapor encroachment is possible.<sup>5</sup>

The Project site is not identified on the Cortese List, and no hazardous materials or associated storage containers, drains, sumps, or unidentified but potentially hazardous materials are present on the property.<sup>6</sup> However, because of the age of the buildings on-site, which were built in 1912, asbestos and lead-based paint may be present on interior surfaces; asbestos may also be present in the shingled siding of the larger structure. If present, demolition would require abatement strategies to safely manage asbestos and lead.

Screening tests for soil vapor encroachment did not identify chemicals of concern from prior property uses. However, six properties within one-third mile of the Project site are known to have had chemical releases, including hydrocarbon releases. Such releases can result in contaminated soil vapors. Per requests from the Regional Water Quality Control Board for the San Francisco region, the applicant would incorporate construction design strategies that would ensure that soil vapors would not travel down pathways created during Project construction (e.g., along utility corridors, in elevator shafts, etc.). If required to comply with air quality standards, the Project would install a sub-slab vapor barrier and possibly a positive ventilation system to protect indoor air quality. It is assumed that the vapor barrier would meet performance criteria and prevent any exposure at the proposed residences. Groundwater encountered during construction would be disposed of in accordance with a management plan, which would be reviewed by the City and local authorities, as appropriate. The handling and disposal of any contaminated soil or groundwater would comply with the regulations of the appropriate oversight agencies and the statutes governing such work.

## Construction Schedule and Phasing

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

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<sup>4</sup> RNC Environmental, LLC. 2019. *Phase I Environmental Site Assessment: 128 Lorton, APN 029-231-210, 128 Lorton Avenue, Burlingame, San Mateo County, California*. May 12. (RNC Project Number 1605A.) Prepared for Pacific West Communities, Inc., Eagle, ID.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

Project construction is expected to commence in August 2020 and continue through Project completion in January 2022. Project construction would occur during the following hours, which are allowed by the City, per Municipal Code Section 18.07.110:

- Weekdays: 8:00 a.m.–7:00 p.m.
- Saturdays: 9:00 a.m.–6:00 p.m.
- Sunday and holidays: No construction allowed.

The Project would be constructed in multiple phases that could overlap. In total, it is anticipated that Project construction would have a duration of approximately 15 months, as follows:

- Hazardous Survey: 5 work days
- Abatement (as needed): 60 work days
- Mobilization: 5 work days
- Demolition: 10 work days
- Rough Grading: 5 work days
- Foundations and Backfill: 30 work days
- Parking Podium: 30 work days
- Framing and Exterior Finishes: 100 work days
- Interior Finishes: 120 work days
- Punch List: 20 work days
- Final Inspection: 5 work days

The construction schedule for this Project is expected to overlap with the construction schedule of the Village at Burlingame Project. As part of the Village at Burlingame Project, the surface parking lot adjacent to the Project site (Lot N) would be redeveloped as a five-story, 388-vehicle parking structure. The surface parking lot across the street (Lorton Avenue) from the Project site (Lot F) would be redeveloped as a five-story residential building. The approved parking garage at Lot N would be constructed between October 2019 and January 2021, and the approved residential building at Lot N would be constructed between May 2020 and May 2022.

## Construction Equipment and Staging

Equipment used during Project construction would include excavators, dump trucks, backhoes, graders, forklifts, concrete saws, concrete pump trucks, cranes, and air compressors. Potential construction laydown and staging areas would be located on the Project site. The applicant has committed to ensuring that all off-road diesel-powered equipment used during construction is equipped with U.S. Environmental Protection Agency (EPA) Tier 4 “final” engines.

Excavation would reach a depth of 18 inches for foundations. Trenches for utilities could reach a depth of 4 feet at some locations. There would be no pile driving associated with the Project; however, some limited pier drilling may be required. In order to reduce potential noise impacts during construction, the applicant has committed to developing and adhering to a Construction Noise Control Plan. This plan would include measures such as:

- Using smaller equipment with lower horsepower or reducing the hourly utilization rate of equipment used on the site to reduce noise levels at 50 feet to the allowable level.

- Locating construction equipment as far as feasible from noise-sensitive uses.
- Requiring that all construction equipment powered by gasoline or diesel engines have sound control devices that are at least as effective as those originally provided by the manufacturer and that all equipment be operated and maintained to minimize noise generation.
- Prohibiting gasoline or diesel engines from having unmuffled exhaust systems.
- Not idling inactive construction equipment for prolonged periods (i.e., more than 5 minutes).
- Constructing a solid plywood barrier around the construction site and adjacent to operational businesses, residences, or other noise-sensitive land uses.
- Using temporary noise control blanket barriers.
- Monitoring the effectiveness of noise attenuation measures by taking noise measurements.
- Using “quiet” gasoline-powered compressors or electrically powered compressors and electric rather than gasoline- or diesel-powered forklifts for small lifting.

## Section 2

# CEQA Exemption

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Article 19 of the California Environmental Quality Act (CEQA) Guidelines, Sections 15300 to 15333, identifies classes of projects that do not have a significant effect on the environment and, therefore, are exempt from review under CEQA.

## Class 32 (Infill Development)

Among the classes of projects that are exempt from CEQA review are those that are specifically identified as urban infill development. CEQA Guidelines Section 15332 states that the term *infill development* (or the Class 32 exemption) is applicable to projects that meet the following conditions:

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as applicable zoning designations and regulations.
- (b) The proposed development occurs within the city limits, on a project site that is no more than 5 acres and surrounded by urban uses.
- (c) The project site has no value as habitat for endangered, rare, or threatened species.
- (d) Approval of the project would not result in any significant effects related to traffic, noise, air quality, or water quality.
- (e) The site can be adequately served by all required utilities and public services.

The analysis presented in the following section provides substantial evidence that the Project qualifies for an exemption under CEQA Guidelines Section 15332 as a Class 32 urban infill development. The Project would not have a significant effect on the environment.

## Exemptions

Even if a project is ordinarily exempt under the potential categorical exemptions, CEQA Guidelines Section 15300.2 provides specific instances where exceptions to otherwise applicable exemptions apply. Exceptions to a categorical exemption apply in the following circumstances, effectively nullifying a CEQA categorical exemption:

- (a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located. A project that is ordinarily insignificant in its impact on the environment may, in a particularly sensitive environment, be significant. Therefore, these classes are considered to apply in all instances, except when the project may affect an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.
- (b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type and in the same place over time is significant.

- (c) Significant Effect. A categorical exemption shall not be used for an activity when there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
- (d) Scenic Highways. A categorical exemption shall not be used for a project that may result in damage to scenic resources, including, but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway that has been officially designated as a state scenic highway. This does not apply to improvements that are required as mitigation by an adopted negative declaration or certified environmental impact report (EIR).
- (e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site that is included on any list compiled pursuant to Section 65962.5 of the Government Code.
- (f) Historical Resources. A categorical exemption shall not be used for a project that may cause a substantial adverse change in the significance of a historical resource.

The following analysis presents substantial evidence that there are no exceptions that apply to the Project or its site, that the Project would not have a significant effect on the environment, and that the Class 32 exemption remains applicable.

## City of Burlingame – Standard Conditions of Approval

As stated above, the Project site is within the Burlingame Downtown Specific Plan. Therefore, the Project is subject to the Standard Conditions of Approval (SCAs), which apply to all projects within the Downtown Specific Plan area. These conditions incorporate development policies and standards from several adopted plans and policies (e.g., the Municipal Code, 2040 General Plan, requirements of jurisdictional agencies) and substantially mitigate potential environmental impacts. The conditions are included in the discussion and analysis of subsequent environmental review for all development projects within the Downtown Specific Plan area.

In reviewing project applications, the City determines which SCAs apply, depending on the specific characteristics of the project type and/or project site. Because the SCAs are mandatory City requirements, this analysis assumes that the SCAs would be imposed and implemented by the Project and not imposed as mitigation measures under CEQA. If it is determined that a project would have a significant environmental impact, even with implementation of the conditions, other feasible mitigation measures shall be developed.

An initial study/mitigated negative declaration (IS/MND) was prepared for the Downtown Specific Plan, which analyzed potential impacts of new infill development and included SCAs to mitigate potential environmental impacts. The SCAs for the Downtown Specific Plan have been found to mitigate environmental effects of projects proposed in the area substantially. As applicable, SCAs are adopted as requirements of individual projects when approved by the City and designed to avoid or substantially reduce a project's environmental effects.



## Section 3

# CEQA Exemption Checklist

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## Introduction

The following analysis provides substantial evidence to support a conclusion that the Project qualifies for an exemption under CEQA Guidelines Section 15332 as a Class 32 urban infill development and would not have a significant effect on the environment.

## Criterion Section 15332(a): General Plan and Zoning Consistency

	Yes	No
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The 2010 Downtown Specific Plan continues to serve as a policy document and implementation guide for development and planning decisions in the downtown area. Per the Downtown Specific Plan, downtown Burlingame is divided into a series of planning areas, which provide for different mixes and intensities. To allow for more precise distinctions, each area is further divided into blocks. The Project site is located entirely on Block 24B of the Downtown Specific Plan, which is within the R-4 Incentive District. The land uses in the R-4 Incentive District are predominantly high-density multi-family residential uses but also civic, quasi-civic, and cultural uses. The R-4 Incentive District is regulated by R-4 zoning standards, consistent with R-4 properties citywide. Multi-family residential uses are considered permitted uses for the R-4 zone.

The Project qualifies for a housing density bonus, consistent with California's Density Bonus Law and the City's Density Bonus Ordinance (Municipal Code Section 25.63.020) because approximately 10.5 percent of the units proposed would be affordable and reserved for moderate-income households.<sup>7</sup> Section 25.63.050 of the Municipal Code provides the following:

An applicant may apply for a waiver or modification of development standards that will have the effect of physically precluding the construction of a development at the densities or with the concessions or incentives permitted by this chapter. The developer must demonstrate that development standards that are requested to be waived or modified will have the effect of physically precluding the construction of a development meeting the criteria of subsection (a) of Section 25.63.020 at the densities or with the concessions or incentives permitted by this chapter.

The R-4 zoning designation includes development standards for building setbacks, lot coverage (50 percent), building height (55 feet), and landscaping (e.g., no more than 40 percent of the front setback of the building shall be paving or other impervious surface). The Project would comply with the landscaping requirements; however, the proposed setbacks, proposed height of the building (56 feet, six inches tall), and proposed lot coverage (79.6 percent) are beyond what is allowed in the development standards under the R-4 zoning designation. In addition, the Project would not comply with the common open space and private open space requirements under the condominium subdivision standards. Lastly, the Project would not comply with the off-street parking requirements (17 spaces provided where 24

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<sup>7</sup> 10.5 percent = (two affordable units/19 total units) × 100 percent

spaces are required). However, if a project uses a density bonus, the zoning code allows for a waiver or modification. The applicant would obtain a waiver/modification to the development standards, consistent with Section 25.63.050 of the Municipal Code.

Given these facts, the Project meets the criteria of CEQA Guidelines Section 15332(a) and is consistent with general plan and applicable zoning regulations for the site.

### Criterion Section 15332(b): Project Location, Size, and Context

	Yes	No
The proposed development occurs within city limits on a project site of no more than 5 acres substantially surrounded by urban uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Project is within the incorporated limits of the city of Burlingame, on a single 0.172-acre lot at 128 Lorton Avenue. The Project site is bound by public parking to the north and west (Lot N) (a five-level public parking garage is currently under construction); a residential multi-story building to the east, and Lorton Avenue, a multi-story residential building, and another surface parking lot (Lot F) to the south.

The surrounding area is urban/developed; it supports urban land uses and has paved public streets (see Figure 1). 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."<sup>8</sup> Given these facts, the Project adheres to the criteria of CEQA Guidelines Section 15332(b) as a site with no more than 5 acres that is substantially surrounded by urban uses.

### Criterion Section 15332(c): Endangered, Rare, or Threatened Species

	Yes	No
The project site has no value as habitat for endangered, rare, or threatened species.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

As shown in Figure 1, the Project site is currently covered with urban uses, in the form of pavement and two residential structures. There is some landscape vegetation in the front yard of the lot (i.e., a small lawn and shrubs). Although there are no trees on the property, there is one street tree between the sidewalk and Lorton Avenue; that tree would be removed and replaced with two new 24-inch box street trees. Overall, the Project would compensate for removal of the tree by planting two street trees and four trees on the subject property (in 24-inch boxes). The Project would also include a combination of shrubs, perennials, vines, and ground cover throughout the site. There are no aquatic or wetland features on or adjacent to the Project site.

The Project site is in the downtown area of Burlingame, which is fully developed and not known to support any natural or sensitive biological communities. As part of a California Natural Diversity Database (CNDDB) review for the Downtown Specific Plan IS/MND, it was discovered that two special-status species have been historically documented in the plan area: San Francisco garter snake (*Thamnophis sirtalis tetrataenia*) and Franciscan onion (*Allium peninsulare* var. *franciscanum*).<sup>9</sup> Both of

<sup>8</sup> Governor's Office of Planning and Research. 2016. *California Environmental Quality Act Statutes and Guidelines*. Section 21072, p. 8.

<sup>9</sup> City of Burlingame. 2010. *Draft Burlingame Downtown Specific Plan Initial Study/Mitigated Negative Declaration*. May 27, 2010. Available: [https://www.burlingame.org/document\\_center/Planning/General%20and%20Specific%20Plans/Draft%20Initial%20Study%20Mitigated%20Negative%20Declaration.pdf](https://www.burlingame.org/document_center/Planning/General%20and%20Specific%20Plans/Draft%20Initial%20Study%20Mitigated%20Negative%20Declaration.pdf). Accessed: June 2020.

these species require grassland habitat communities, which are not present within or adjacent to the Project area. Given these facts, the Project adheres to the criteria of CEQA Guidelines Section 15332(c). However, because the Project would remove some small shrub vegetation that is currently present on-site and one tree, the following SCAs from the Downtown Specific Plan would be applicable to the Project during the construction period, resulting in ***less-than-significant*** impacts on existing habitat.

**Pre-construction Nesting Bird Survey (SCA-14).** Construction under the Downtown Specific Plan shall avoid the March 15 through August 31 avian nesting period to the extent feasible. If it is not feasible to avoid the nesting period, a survey for nesting birds shall be conducted by a qualified wildlife biologist no earlier than 7 days prior to construction. The area surveyed shall include all clearing/construction areas as well as areas within 250 feet of the boundaries of these areas or as otherwise determined by the biologist. In the event that an active nest is discovered, clearing/construction shall be postponed within 250 feet of the nest until the young have fledged (left the nest), the nest is vacated, and there is no evidence of second nesting attempts.

## Criterion Section 15332(d): Traffic

	Yes	No
Approval of the project would not result in any significant effects related to traffic.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Setting

A transportation impact analysis (TIA) prepared by Hexagon Transportation Consultants in June 2020 is included in this document as Appendix A. The TIA describes existing and future conditions for transportation with and without the Project. In addition, the TIA includes information on regional and local roadway networks, pedestrian and transit conditions, and transportation facilities associated with the Project. For a more detailed analysis, including all tables and figures, please refer to Appendix A.

Senate Bill 743, as codified in Public Resources Code Section 21099, resulted in changes to the CEQA Guidelines. Public Resources Code Section 21099 states that vehicle miles traveled (VMT) is the appropriate metric for measuring transportation impacts. Public Resources Code Section 21099 also notes that level of service (LOS), or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment. Therefore, this analysis focuses on potential impacts on VMT. LOS information is included here for informational purposes only.

## Trip Generation

For analysis of the Project, the TIA assumed the trip generation rates for the proposed new housing units at 128 Lorton Avenue.<sup>10</sup> The Project would generate 103 gross daily vehicle trips, with seven gross trips occurring during the AM peak hour and eight gross trips occurring during the PM peak hour. However, a transit trip reduction of 10 percent was applied to the peak-hour trip generation estimates.<sup>11</sup> After applying the transit trip reduction, the Project would generate 67 net new daily vehicle trips, with four net new trips (two inbound and two outbound) during the AM peak hour and five net new trips (two inbound and three outbound) during the PM peak hour.

<sup>10</sup> Standard trip generation rates typically come from an Institute of Transportation Engineers (ITE) publication titled *Trip Generation Manual* (tenth edition [2017]). Project trip generation was estimated by applying the appropriate trip generation rates obtained from the *Trip Generation Manual* to the size and uses of the development. The average trip generation rate for "Multi-Family Housing Mid-Rise" (Land Use 221) was applied to the Project.

<sup>11</sup> The reduction is based on the Project's proximity to Burlingame Trolley service and the Burlingame Caltrain station.

## Vehicle Miles Traveled

The Project is 0.2 mile from El Camino Real, which is considered a high-quality transit corridor. In addition, the Project is approximately 0.3 mile from the Burlingame Caltrain station, which is considered a major transit stop. CEQA Guidelines Section 15064.3, subdivision (b)(1), states that “generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less-than-significant transportation impact.” Because the Project would be within 0.5 mile of a high-quality transit corridor and an existing major transit stop, the Project would not conflict with CEQA Guidelines Section 15064.3, subdivision (b). The Project would result in a ***less-than-significant*** impact on VMT.

## Roadway Segments

As the congestion management agency for San Mateo County, the City/County Association of Governments (C/CAG) is responsible for maintaining the performance and standards of the Congestion Management Program (CMP). Per CMP technical guidelines, all new developments estimated to add at least 100 net peak-hour trips to the CMP roadway network are required to implement travel demand management (TDM) measures in accordance with the C/CAG CMP checklist. Given that the Project is expected to add fewer than 100 net peak-hour vehicle trips to the CMP roadway network, implementation of TDM measures is not required. Accordingly, the Project would result in ***less-than-significant*** impacts on roadway segments.

## Access and Circulation

Vehicular access to the proposed condominium building would be provided from one full-access driveway on Lorton Avenue. The driveway would be 12 feet, 4 inches wide, providing access to 17 stalls in the parking garage. The City requires one 12-foot-wide driveway for parking areas with fewer than 30 vehicle spaces. Therefore, the new parking structure would comply with zoning code requirements for two-way driveways. However, the driveway would not be wide enough for two vehicles to pass each other. Although an entering vehicle would have to wait on Lorton Avenue while another vehicle is exiting, this would not be a problem because of the low traffic volumes and speeds on Lorton Avenue.

There are no trees or visual obstructions along Lorton Avenue that could obscure sight distance at the driveway. Garage access points are required to be free and clear of obstructions and provide adequate sight distance, thereby ensuring that drivers see pedestrians on sidewalks, as well as vehicles and bicycles, when exiting. The sight distance from the parking garage driveway is approximately 100 feet in each direction. This distance is adequate for a downtown setting. In addition, it is expected that vehicles would be traveling slowly on Lorton Avenue. However, the edge of the proposed building would be 5 feet from the sidewalk, which would not allow drivers to see pedestrians on the sidewalk when exiting the garage and vice versa. Appropriate warning signs and audible warning signals should be considered at the garage entrance to alert pedestrians and bicyclists when vehicles are exiting the garage. With warning signs and audible warning signals, impacts related to access and circulation at the Project site would be ***less than significant***.

## Bicycle and Pedestrian Facilities

Bicycle facilities are available in the immediate vicinity of the Project site, with connections to the Burlingame Caltrain station. Bicyclists traveling to and from the site to the Burlingame Caltrain station could use Burlingame Avenue and Lorton Avenue. Although neither street is a designated bike route,

because of the low traffic volumes and speeds, both streets are conducive to bicycle travel. The Project would not remove any bicycle facilities, nor would it conflict with any adopted plans or policies for new bicycle facilities, resulting in *less-than-significant* impacts.

Pedestrian facilities in the study area consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections. The Project is expected to increase the number of pedestrians who use the sidewalks and crosswalks. Project plans show that the existing sidewalks along Lorton Avenue are approximately 5 feet wide.

The overall network of sidewalks and crosswalks in the vicinity of the Project site has adequate connectivity, providing pedestrians with safe routes to transit services and points of interest. The Project would not remove any pedestrian facilities or conflict with any adopted plans or policies for new pedestrian facilities, resulting in *less-than-significant* impacts.

## Transit

The Project study area is well served by San Mateo County Transit District (SamTrans), Caltrain, and the Burlingame Trolley. Specifically, the study area is served by two SamTrans express bus routes and two shuttle routes. The Project would generate approximately seven person-trips during the AM peak hour and eight person-trips during the PM peak hour. Given the Project site's proximity to transit services, it is expected that a portion of residents' trips (up to 10 percent) would be made by transit. Assuming that up to 10 percent of the total number of trips would be made by transit, the Project would result in approximately one new transit rider (maximum) during peak hours. It is also assumed that existing transit has adequate capacity for accommodating this minor increase in ridership. The Project would not remove any transit facilities, nor would it conflict with any adopted plans or policies associated with new transit facilities, resulting in *less-than-significant* impacts.

## Intersection Levels of Service

California Public Resource Code Section 21099 states that LOS, and similar metrics, generally no longer constitutes a significant environmental effect under CEQA. Therefore, the following LOS analysis is included below for informational purposes only. The Project's potential impact on VMT is identified above.

## Traffic Scenarios

The following traffic forecasting scenarios were considered in the analysis:

- **Existing Conditions (Scenario 1):** Existing traffic volumes at study intersections were obtained from traffic counts in March 2018 and January 2019.
- **Background Conditions (Scenario 2):** Background traffic volumes reflect traffic added by approved but not-yet-completed developments in the Project area. Background conditions are defined as conditions within the next 3 to 5 years (a horizon year of 2021–2023), just prior to completion/occupation of the Project.
- **Existing-Plus-Project Conditions (Scenario 3):** Traffic volumes with the Project were estimated by adding the additional traffic generated by the Project to existing traffic volumes.
- **Project Conditions (Scenario 4):** Background traffic volumes with the Project were estimated by adding the additional traffic generated by the Project to background traffic volumes.

- **Cumulative Conditions (Scenario 5):** Cumulative traffic volumes represent traffic growth through 2029. Cumulative traffic volumes were estimated by applying an annual growth factor of 1.0 percent as well as Project-generated traffic.

For all scenarios, the TIA included an analysis of AM and PM peak-hour traffic conditions for two unsignalized, stop-controlled intersections in the vicinity of the Project site, as follows:

1. Lorton Avenue and Howard Avenue
2. Lorton Avenue and Bayswater Avenue

The City does not have a formally adopted LOS standard for unsignalized intersections.

## LOS Analysis

**Existing Conditions (Scenario 1).** Both stop-controlled study intersections currently operate at LOS B or better during the AM and PM peak hours. Lorton Avenue/Howard Avenue is all-way stop controlled, and Lorton Avenue/Bayswater Avenue is two-way stop controlled.

**Background Conditions (Scenario 2).** Both study intersections would continue to operate at an acceptable LOS (LOS B or better) during both the AM and PM peak hours under background conditions. This indicates that vehicles at stop-controlled approaches would continue to experience only minor delays.

**Existing-Plus-Project Conditions (Scenario 3).** Both study intersections would continue to operate at LOS B or better during both the AM and PM peak hours. This indicates that vehicles at stop-controlled approaches would continue to experience only minor delays with the addition of Project traffic under existing conditions.

**Project Conditions (Scenario 4).** With the Project, both study intersections would continue to operate at LOS B or better during both the AM and PM peak hours. Therefore, vehicles at the stop-controlled approaches would continue to experience only minor delays, similar to existing conditions.

**Cumulative Conditions (Scenario 5).** Both study intersections would operate at an acceptable LOS of C or better during both the AM and PM peak hours. Therefore, even with the addition of Project traffic and general future traffic growth in the area under cumulative conditions, vehicles at stop-controlled approaches would be expected to experience only moderate delays.

**Overall LOS with Project.** As explained above, the Project, under all conditions, would not degrade the existing LOS at unsignalized intersections to unacceptable levels.

## Criterion Section 15332(d): Noise

	Yes	No
Approval of the project would not result in any significant effects related to noise.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Overview of Noise and Sound

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

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

Human sound perception, in general, is such that a change in sound level of 1 decibel (dB) cannot typically be perceived by the human ear, a change in sound level of 3 dB is just noticeable, a change of 5 dB is clearly noticeable, and a change of 10 dB is perceived as doubling or halving the sound level. A doubling of actual sound energy is required to result in a 3 dB (i.e., barely noticeable) increase in noise; in practice, for example, this means that the volume of traffic on a roadway would typically need to double to result in a noticeable increase in noise.<sup>12</sup>

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

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

Community noise environments are generally perceived as quiet when the 24-hour average noise level is below 45 dBA, moderate in the 45 to 60 dBA range, and loud above 60 dBA. Very noisy urban residential areas are usually around 70 dBA, community noise equivalent level (CNEL). Along major thoroughfares, roadside noise levels are typically between 65 and 75 dBA CNEL. Incremental increases of 3 to 5 dB to the existing 1-hour equivalent sound level ( $L_{eq}$ ), or to the CNEL, are common thresholds for an adverse community reaction to a noise increase. However, there is evidence that incremental thresholds in this range may not be adequately protective in areas where noise-sensitive uses are located and the CNEL is already high (i.e., above 60 dBA). In these areas, limiting noise increases to 3 dB

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<sup>12</sup> California Department of Transportation. 2013. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. September. Available: [http://www.dot.ca.gov/hq/env/noise/pub/TeNS\\_Sept\\_2013A.pdf](http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013A.pdf).

or less is recommended.<sup>13</sup> Noise intrusions that cause short-term interior levels to rise above 45 dBA at night can disrupt sleep. Exposure to noise levels greater than 85 dBA for 8 hours or longer can cause permanent hearing damage.

## Overview of Ground-borne Vibration

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

Operation of heavy construction equipment creates seismic waves that radiate along the surface of and downward into the ground. These surface waves can be felt as ground vibration. Vibration from the operation of construction equipment can result in effects that range from annoyance for people to damage for structures. Perceptible ground-borne vibration is generally limited to areas within a few hundred feet of construction activities. As seismic waves travel outward from a vibration source, they cause rock and soil particles to oscillate. The actual distance that these particles move is usually only a few ten-thousandths to a few thousandths of an inch. The rate or velocity (in inches per second) at which these particles move is the commonly accepted descriptor of vibration amplitude, referred to as peak particle velocity, or PPV.

Vibration amplitude attenuates (or decreases) over distance. This attenuation is a complex function of how energy is imparted into the ground as well as the soil or rock conditions through which the vibration is traveling (variations in geology can result in different vibration levels). The following equation is used to estimate the vibration level at a given distance for typical soil conditions.  $PPV_{ref}$  is the reference PPV at 25 feet.

$$PPV = PPV_{ref} \times (25/\text{distance})^{1.5}$$

Table 1 summarizes typical vibration levels generated by construction equipment at a reference distance of 25 feet and other distances, as determined with use of the attenuation equation above.

**Table 1. Vibration Source Levels for Construction Equipment**

Equipment	PPV (in/sec) at 25 Feet	PPV (in/sec) at 50 Feet	PPV (in/sec) at 75 Feet	PPV (in/sec) at 100 Feet	PPV (in/sec) at 175 Feet
Caisson drill	0.089	0.0315	0.0171	0.0111	0.0048
Large bulldozer	0.089	0.0315	0.0171	0.0111	0.0048
Loaded trucks	0.076	0.0269	0.0146	0.0095	0.0041
Jackhammer	0.035	0.0124	0.0067	0.0044	0.0019
Small bulldozer	0.003	0.0011	0.0006	0.0004	0.0002

Source: Federal Transit Administration. 2018. Transit Noise and Vibration Impact Assessment. FTA-VA-90-1003-06. Office of Planning and Environment. Available: [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf).

<sup>13</sup> Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment*. FTA-VA-90-1003-06. Office of Planning and Environment. Available: [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123\\_0.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf).



## Regulatory Setting

There are no federal noise standards that are directly applicable to the Project. With regard to state regulations, Title 24 of the California Code of Regulations, Part 2 (California Noise Insulation Standards), establishes minimum noise insulation standards to protect persons within new hotels, motels, dormitories, long-term care facilities, apartment houses, or dwellings other than single-family residences. Under this regulation, interior noise levels that are attributable to exterior noise sources cannot exceed 45 dBA, day-night level ( $L_{dn}$ ), in any habitable room.

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

### 2040 General Plan

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

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

Also in the Community Safety Element of the 2040 General Plan are noise compatibility criteria for each category of land use in the city. Multi-family residential land uses, motels and hotels, schools, libraries, churches, hospitals, and nursing homes are compatible with outdoor noise levels of up to 60 dBA,  $L_{dn}$  or CNEL, while single-family residential land uses are compatible with noise of up to 55 dBA,  $L_{dn}$  or CNEL. Less noise-sensitive land uses, such as commercial and industrial uses, are considered compatible with higher levels of outdoor noise (refer to Figure 7, below, from the Community Safety Element, which shows the outdoor noise levels that are suitable for the various land use categories).

Land Use Category	Community Noise Exposure Ldn/CNEL, dB					
	55	60	65	70	75	80
Residential – Low Density Single Family, Duplex, Mobile Homes						
Residential – Multi. Family						
Transient Lodging – Motels, Hotels						
Schools, Libraries, Churches, Hospitals, Nursing Homes						
Auditoriums, Concert Halls, Amphitheaters						
Sports Arenas, Outdoor Spectator Sports						
Playgrounds, Neighborhood Parks						
Golf Course, Riding Stables, Water Recreation, Cemeteries						
Office Buildings, Business Commercial and Professional						
Industrial, Manufacturing Utilities, Agriculture						



#### **NORMALLY ACCEPTABLE**

Specified land use is satisfactory based upon the assumption that most buildings involved are of normal conventional construction, without any special noise insulation requirements.



#### **CONDITIONALLY ACCEPTABLE**

New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.



#### **NORMALLY UNACCEPTABLE**

New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.



#### **CLEARLY UNACCEPTABLE**

New construction or development should generally not be undertaken. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Source: City of Burlingame 2019.

## City of Burlingame Municipal Code

The Building Construction section of the Municipal Code establishes daily hours for construction in the city. Chapter 18.07.110 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. An exception, which must be approved in writing by a building official, shall be granted for a period of no more than 3 days for structures with a gross floor area of less than 40,000 gsf when reasonable to accomplish erection, demolition, alteration, or repair work; the exception shall not exceed 20 days for structures with a gross floor area of 40,000 gsf or greater. In addition to the restriction on hours for construction, Section 10.40.039 of the Municipal Code identifies time periods when loading and unloading activities are prohibited in a residential district (i.e., between 10:00 p.m. Sunday, Monday, Tuesday, Wednesday, or Thursday and 7:00 a.m. the following day; between 10:00 p.m. Friday and 8 a.m. the following Saturday; between 10:00 p.m. Saturday and 8:00 a.m. the following Sunday; and between 10:00 p.m. the day before a holiday and 8:00 a.m. on the holiday).

The Municipal Code also contains 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).

### Existing Noise Levels

The primary existing source of noise in the Project area is traffic on nearby roadways, mainly Lorton Avenue and, to a lesser extent, Howard Avenue, Highland Avenue, and Bayswater Avenue. Other typical urban noise sources, such as voices, landscaping equipment, sirens, commercial vehicle loading/unloading, and parking lots,<sup>14</sup> are also present.

Existing noise levels in the Project area can be characterized by the noise measurements conducted for the 2040 General Plan EIR. Short-term measurement site 1 from the 2040 General Plan EIR is nearest to the Project site, at the intersection of Bayswater Avenue and California Drive, approximately 600 feet away. Daytime noise levels at this location ranged from 66.9 to 67.2 dBA  $L_{eq}$ .<sup>15</sup> Measurement site 1 is near a street (California Drive) that is busier than streets near the Project site; as such, ambient noise levels at the Project site are somewhat lower than levels at the measurement location. Long-term measurement site 1 from the 2040 General Plan EIR is in Washington Park. Although this location is approximately 2,000 feet from the Project site, the 2040 General Plan EIR concluded that noise levels at measurement site 1 are representative of noise levels associated with single-family residential land uses in the eastern part of the city.<sup>16</sup> Because the Project site is in the same region of the city, noise levels at long-term measurement site 1 represent a reasonable approximation of noise levels at the Project site.

The noise levels at long-term site 1 are as follows:

- Daytime: 49.6–61.5 dBA  $L_{eq}$
- Evening: 57.2–59.9 dBA  $L_{eq}$

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<sup>14</sup> These sources of noise include car engines starting, car doors slamming, car alarms activating, and vehicle backup alarms sounding.

<sup>15</sup> City of Burlingame. 2018. *Burlingame 2040 General Plan EIR*. Chapter 15, Noise and Vibration. Available: [https://www.envisionburlingame.org/files/managed/Document/360/Chapter%2015\\_Noise\\_BurlingameGP-EIR\\_06-26-2018.pdf](https://www.envisionburlingame.org/files/managed/Document/360/Chapter%2015_Noise_BurlingameGP-EIR_06-26-2018.pdf). Accessed: July 2019.

<sup>16</sup> Ibid.

- Nighttime: 53.4–65.6 dBA  $L_{eq}$
- 24-hour noise: 59.3 dBA CNEL

### **Noise-Sensitive Land Uses**

The Project site is surrounded by predominately commercial and residential land uses. Immediately east of the Project site is a multi-family apartment building, the Lorton Arms, at 124 Lorton Avenue. This building houses the closest group of noise-sensitive receptors. Several other multi-family buildings are located nearby; these include the buildings across the street from the Project site at 121 and 125 Lorton Avenue and on the rest of the block. In the larger neighborhood surrounding the Project site, there are numerous multi-family buildings as well as single-family homes. These residential uses are located farther to the east along Lorton Avenue and on Bayswater Avenue, Park Road, and Highland Avenue. Many residential uses have the potential to be affected by the Project, but the residential use that would be the affected is the Lorton Arms building.

The Project site is approximately 200 feet east of the intersection of Howard Avenue and Lorton Avenue, within a dense commercial area. The businesses on Howard Avenue and Lorton Avenue include banks, salons, spas, retail stores, real estate offices, restaurants, and cafes. In general, commercial uses are not considered noise-sensitive uses. However, one business on Howard Avenue that is considered noise-sensitive is Teaching and Assessing Language for Kids (TALK), which is a speech pathologist's office at 1209 Howard Avenue. This land use could be adversely affected by substantial increases in noise above ambient levels. Other types of land uses, such as educational and religious uses, are also adversely affected by increased noise levels. The Limitless Church is 200 feet east of the Project site (at 110 Lorton Avenue), and the Metaphysical Church is 700 feet south of the Project site (at 241 Park Road). The Saint Catherine of Siena School, an elementary school, is approximately 450 feet south of the Project site (at 1300 Bayswater Avenue). In addition, north of the Project site are multiple auto body shops and car dealerships on California Drive, which range in distance from 250 to more than 1,000 feet from the site. These types of uses are not considered noise-sensitive uses.

### **Noise Effects**

**Rooftop Heating, Ventilation, and Air-Conditioning (HVAC) Equipment Noise and Other Operational Noise Sources.** The Project would include roof-mounted HVAC units to provide heating and cooling for building occupants. Typical HVAC equipment can produce sound levels in the range of 70 to 75 dBA at 50 feet, depending on the size of the equipment.<sup>17</sup> Based on manufacturers' information, the heat pump used on the rooftop will generate a noise level of approximately 69 dBA.<sup>18</sup> The individual heating and cooling units for each housing unit, also mounted on the rooftop, will generate noise levels between 51 and 56 dBA.<sup>19</sup> The specific equipment that the Project would use for heating and cooling would therefore generate lower noise levels than typical equipment.

Other sources of noise during Project operations may include landscaping activities, building maintenance, garbage collection, and human voices. As discussed previously, the nearest noise-sensitive land use is adjacent to the Project site, in an area where individual residences may be as close as 20 feet from the site. However, HVAC equipment at the Project site would be located on top of the fifth floor, which would increase attenuation with the vertical distance between the equipment and the nearest

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<sup>17</sup> Hoover and Keith. 2000. *Noise Control for Buildings, Manufacturing Plants, Equipment, and Products*. Houston, TX.

<sup>18</sup> Carrier. 2012. *Product Data – 25 HBC5*.

<sup>19</sup> Mitsubishi Electric. 2015. *M-Series Submittal Data*.

residences. The roof would also have a wall that would screen the mechanical equipment, which would further attenuate noise from the equipment. In addition, Chapter 15 of the 2040 General Plan EIR concludes that stationary-source noise impacts from HVAC equipment and other non-transportation noise sources would be less than significant because the equipment and sources would be required to comply with the provisions of the Municipal Code that pertain to such sources.<sup>20</sup> Noise impacts from rooftop HVAC equipment and other operational noise sources at the Project site would, therefore, be ***less than significant***.

**Parking Structure Noise.** According to the TIA (Appendix A), approximately six vehicles in the AM peak hour and seven vehicles in the PM peak hour would enter and exit the Project garage via the driveway. The small number of vehicles entering and exiting the driveway during peak hours would not cause a noticeable change in noise in a dense urban setting. In addition, noise from vehicle engines and tires in the Project's parking structure would be attenuated by the walls of the garage.

Inside the garage, a CityLift Puzzle vehicle stacking unit would be used to facilitate vehicle parking in a space-limited area. The stacking unit mechanically moves cars horizontally and vertically, which generates noise from use of an electric motor and the movement of metal gates. At a distance of 5 feet, horizontal and vertical car movement can result in noise levels of 63 and 59  $L_{eq}$  dBA, respectively.<sup>21</sup> Noise levels of 59 and 63  $L_{eq}$  dBA at a distance of 5 feet would not cause a substantial increase in noise that would be noticeable at any sensitive land use. This is because the noise would attenuate to a level that would be consistent with ambient levels within a short distance. As stated above, sound attenuates at a rate of 6 dB with a doubling of distance; therefore, at a distance of 10 feet, the loudest noise from the stacking unit would be 57  $L_{eq}$  dBA ( $63 - 6 = 57$ ). At 20 feet, noise would attenuate by 12 dB; the loudest noise would be 51  $L_{eq}$  dBA. As mentioned above, the Project garage would also have walls that would further attenuate noise. Because stacking unit noise would attenuate to ambient levels of noise or below within a short distance, existing sensitive land uses would not notice a substantial increase in noise. Therefore, noise impacts from the proposed parking structure would be ***less than significant***.

**Traffic Noise.** Traffic would increase in the area as a result of Project implementation. Traffic noise increases with increasing traffic volumes. However, a doubling in traffic volumes (a 100 percent increase) equates to a 3 dB increase in noise. As discussed above, an increase of 3 dB is considered to be barely noticeable by the human ear and not a substantial increase. Roadway segments with less than a 100 percent increase in traffic are therefore considered to be segments that would not experience significant traffic noise impacts as a result of the Project (refer to Appendix B for the traffic noise data tables).

With respect to existing conditions, representing traffic volumes in 2018 and 2019, the Project would result in minor increases in traffic volumes in the AM peak hour (i.e., up to a maximum of 2 percent on Lorton Avenue between Howard Avenue and Bayswater Avenue). For future conditions in the 2021 to 2023 timeframe, background growth in the Project area would result in traffic volume increases, even in the absence of the Project. With respect to these future background conditions, the Project would result in a maximum increase of 1.6 percent in the AM peak hour on the same segment of Lorton Avenue. The increase in traffic volumes relative to existing conditions and background conditions would correspond to an increase in noise levels that would not be noticeable to the human ear.

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<sup>20</sup> City of Burlingame. 2018. *Envision Burlingame Draft Environmental Impact Report*. June 28. Available: [https://www.envisionburlingame.org/files/managed/Document/378/BurlingameGP\\_DEIR\\_FullDocument\\_06-28-2018.pdf](https://www.envisionburlingame.org/files/managed/Document/378/BurlingameGP_DEIR_FullDocument_06-28-2018.pdf). Accessed: July 2019.

<sup>21</sup> Veneklasen Associates. 2018. *CityLift Puzzle Sound Measurements of Parking Lift Operation*. September 6.

In the cumulative scenario, which corresponds to conditions in 2029, there would be even more background growth in the Project area than in the 2021 to 2023 timeframe. For the cumulative-plus-Project scenario, which accounts for increased traffic volumes from the Project in addition to growth from all other development in the area, traffic volumes would increase in the AM peak hour by a maximum of 44 percent on Lorton Avenue relative to existing conditions. It is important to reiterate that the 44 percent increase on Lorton Avenue is the increase in traffic volumes from all development in the area; therefore, the contribution of only the Project would be significantly less than 44 percent. Nevertheless, the cumulative effect of traffic in the area in 2029 relative to existing conditions would not cause a substantial increase in noise because a 44 percent increase is less than the 100 percent increase required for there to be a noticeable change in noise. Because the increase would not be noticeable, the impacts of traffic noise would be *less than significant*.

**Construction Noise.** The Project would demolish the on-site structures and associated surface parking and construct a new building with a parking structure and other amenities. Demolition and construction activities would generate noise, resulting in a temporary increase in noise levels at adjacent land uses. All construction activities would comply with the time-of-day restrictions specified in the Municipal Code.

The significance of potential noise impacts resulting from demolition and construction would depend on the noise generated by the various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive receptors. To assess the potential for significant construction noise impacts, the Federal Highway Administration's source noise levels for construction equipment were used to approximate the level of noise that would occur during construction. Table 2 shows average noise levels at 50 feet, based on Federal Highway Administration data for the equipment that is expected to be used for Project construction.

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

As shown in Table 3, combined construction noise levels would be generally consistent with the noise levels referenced in Chapter 15, Noise and Vibration, of the 2040 General Plan EIR (i.e., 85 to 88 dBA at 50 feet). The parking podium, framing/roofing and interior finishes phases would result in noise levels that would be lower than 85 dBA  $L_{eq}$  at 50 feet. No construction phase would have noise levels that would exceed 86 dBA  $L_{eq}$  at 50 feet.

Without incorporation of noise reduction measures, some construction equipment would have the potential to increase noise levels above ambient levels, which could be considered a substantial increase. Chapter 15 of the 2040 General Plan EIR notes that sustained  $L_{eq}$  levels of 85 dBA would result in noise that would be 18 to 39 dBA above ambient conditions in low- to medium-density residential areas of the city and 11 to 28 dBA above ambient conditions in higher-density residential, commercial, and industrial areas of the city. Consequently, the 2040 General Plan EIR revised Policy CS.4-10 in the Community Safety Element to require all development projects that are subject to discretionary review and located near noise-sensitive land uses to minimize adverse noise impacts through noise control measures. Noise control measures include construction management techniques, construction equipment controls, sound barriers, and construction noise monitoring.

**Table 2. Construction Equipment Reference Noise Levels for Proposed Project Construction<sup>a</sup>**

<b>Construction Equipment</b>	<b>L<sub>max</sub> at 50 Feet (dBA)</b>	<b>L<sub>eq</sub> at 50 Feet (dBA)</b>	<b>Percent Usage Factor</b>
<b>Phase 1 – Demolition</b>			
Excavator	81	77	40%
Dump truck	76	72	40%
Backhoe	78	74	40%
<b>Phase 2 – Rough Grading</b>			
Grader	85	81	40%
Dump truck	76	72	40%
Backhoe	78	74	40%
<b>Phase 3 – Foundations</b>			
Forklift <sup>b</sup>	84	80	40%
Excavator	81	77	40%
Concrete saw	90	83	20%
Concrete pump truck	81	74	20%
<b>Phase 4 – Parking Podium</b>			
Forklift <sup>b</sup>	84	80	40%
Crane	81	73	16%
Concrete pump truck	81	74	20%
<b>Phase 5 – Framing/Roofing</b>			
Forklift <sup>b</sup>	84	80	40%
Excavator	81	77	40%
Crane	81	73	16%
Air compressor	78	74	40%
<b>Phase 6 – Building Interior/Architectural Coating</b>			
Air compressor	78	74	40%

Source: Federal Highway Administration. 2006. *Roadway Construction Noise Model User's Guide*. Available: [http://www.fhwa.dot.gov/environment/noise/construction\\_noise/rcnm/rcnm.pdf](http://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf). Accessed: June 2019.

<sup>a</sup>. The construction equipment list in this table has been provided by the applicant.

<sup>b</sup>. Represented by “tractor” from user’s guide.

L<sub>max</sub> = maximum sound level

**Table 3.  $L_{eq}$  Construction Noise Levels by Phase (dBA)**

<b>Distance from Source (feet)</b>	<b>Demo.</b>	<b>Rough Grading</b>	<b>Foundations</b>	<b>Parking Podium</b>	<b>Framing/ Roofing</b>	<b>Interiors Finishes</b>
20	90	92	95	92	92	89
50	80	82	85	82	82	79
100	72	75	78	74	75	71
200	65	67	70	67	67	64
300	60	63	66	62	63	59
400	57	60	63	59	60	56
500	55	57	60	57	57	54
600	53	55	58	55	55	52
700	51	54	57	53	54	50
800	50	52	55	52	52	49
900	48	51	54	50	51	47
1,000	47	50	53	49	50	46

**Notes:**

- Geometric attenuation based on 6 dB per doubling of distance.
- This calculation does not include the effects, if any, of local shielding.
- $L_{eq}$  noise is presented in dBA units, which approximate the frequency response of the human ear.
- The three loudest pieces of equipment for each phase are as follows:
  - Demolition: excavator, dump truck, backhoe
  - Rough Grading: grader, dump truck, backhoe
  - Foundations: concrete saw, forklift, excavator
  - Parking Podium: forklift, crane, concrete pump truck
  - Framing/Roofing: forklift, excavator, air compressor
  - Interior Finishes: three air compressors

As noted above, there are multiple noise-sensitive land uses in the immediate vicinity of the Project site, the closest of which is approximately 20 feet away. At that distance,  $L_{eq}$  construction noise levels would be between 89 and 95 dBA. Noise in that range would very likely be a substantial increase over ambient noise levels for occupants at 124 Lorton Avenue and other nearby buildings. However, because existing noise-sensitive land uses are in proximity to the Project site, noise control measures would be required, per Policy CS.4-10 of the 2040 General Plan.

With implementation of a design feature (i.e., develop a Construction Noise Control Plan, as outlined in the Project Description) as part of the Project design, all equipment would comply with applicable thresholds. As described in the Project Description, the Construction Noise Control Plan would be developed by the applicant and include measures such as:

- Using smaller equipment with lower horsepower or reducing the hourly utilization rate of equipment used on the site to reduce noise levels at 50 feet to the allowable level.
- Locating construction equipment as far as feasible from noise-sensitive uses.
- Requiring that all construction equipment powered by gasoline or diesel engines have sound control devices that are at least as effective as those originally provided by the manufacturer and that all equipment be operated and maintained to minimize noise generation.



- Prohibiting gasoline or diesel engines from having unmuffled exhaust systems.
- Not idling inactive construction equipment for prolonged periods (i.e., more than 5 minutes).
- Constructing a solid plywood barrier around the construction site and adjacent to operational businesses, residences, or other noise-sensitive land uses.
- Using temporary noise control blanket barriers.
- Monitoring the effectiveness of noise attenuation measures by taking noise measurements.
- Using “quiet” gasoline-powered compressors or electrically powered compressors and electric rather than gasoline- or diesel-powered forklifts for small lifting.

With the Construction Noise Control Plan incorporated as part of the Project design, construction noise would be reduced to levels that would not be considered substantial. Consistent with Chapter 15 of the 2040 General Plan EIR, construction noise impacts would be *less than significant*.

**Vibration Effects.** As shown in Table 2, above, the Project would require several different types of construction equipment. Although pile driving would not be required, construction would require the use of other equipment that may generate vibration. The equipment that would be used on the Project and generate the most vibration during construction would be a loaded truck and a small bulldozer (see Table 1). The loaded truck would remain on Lorton Avenue and occasionally pass residences in the Project vicinity. For a worst-case scenario, with a residence located 25 feet from the roadway, a loaded truck would generate occasional vibration events with a PPV of approximately 0.076 inch per second (see Table 1). A small bulldozer would very likely operate throughout the Project site and be as close as 20 feet from the nearest residences at 124 Lorton Avenue. Using the source levels in Table 1, as well as the vibration attenuation equation shown in *Overview of Ground-borne Vibration*, vibration levels from a small bulldozer at a distance of 20 feet would have a PPV of 0.004 inch per second. The effects of vibration from a loaded truck and small bulldozer during construction with respect to the potential for building damage and human annoyance are discussed below.

During Project operation, no impact equipment or other equipment associated with substantial ground-borne vibration would be used. No vibration impacts would occur during Project operations.

**Damage.** As discussed in Criterion 15300.2(f): Historical Resources, two buildings in the vicinity of the Project site could be considered “older residential structures.” The threshold for damage potential with this category of structure is a PPV of 0.3 inch per second (for continuous/frequent intermittent sources of vibration).<sup>22</sup>

Table 4 summarizes the guidelines developed by the California Department of Transportation (Caltrans) for damage potential from transient and continuous vibration associated with construction activity. Activities that can cause continuous vibration include the use of excavation equipment, static compaction equipment, tracked vehicles, vehicles on a highway, vibratory pile drivers, pile extraction equipment, and vibratory compaction equipment.

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<sup>22</sup> These building characterizations are used by the California Department of Transportation for the purposes of identifying potential building damage impacts. As a worst-case scenario, it assumed that some of the surrounding buildings fit best within the “older residential structure” category. However, these classifications are considered to be conservative and should not be used to infer any details on the actual age or condition of the surrounding buildings.

**Table 4. Vibration Damage Potential Threshold Criteria Guidelines**

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

Source: California Department of Transportation. 2013. *Transportation and Construction Vibration Guidance Manual*. September. Available: [http://www.dot.ca.gov/hq/env/noise/pub/TCVGM\\_Sep13\\_FINAL.pdf](http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf). Accessed: June 2019.

Notes:

- a. Transient sources create a single isolated vibration event (e.g., blasting or use of drop balls).
- b. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

The equipment with the greatest potential to cause ground-borne vibration are a loaded truck and a small bulldozer. At a reference distance of 25 feet the loaded truck would result in a vibration level (PPV) of 0.076. At a reference distance of 20 feet the small bulldozer would result in a vibration level (PPV) of 0.004. This is well below the level for damage potential at older residential structures (PPV of 0.5 and 0.3 inch per second for transient and continuous sources, respectively), as shown in Table 4, above. Because this assessment is a reasonable worst-case scenario for the area between the location of construction equipment and the nearest adjacent buildings, no damage would occur at any building in the vicinity of the Project site. This impact would be ***less than significant***.

### **Annoyance**

Table 5 summarizes the guidelines developed by Caltrans for annoyance potential from transient and continuous vibration associated with construction activity. As shown in Table 5, the limit of perceptibility for ground-borne vibration is a PPV of 0.04 and 0.01 inch per second for transient and continuous sources, respectively. Note that people are generally more sensitive to vibration during nighttime hours (when sleeping) than during daytime hours.

As discussed above, the estimated vibration level generated by a loaded truck at 25 feet is a PPV of 0.076 inch per second; the estimated vibration level generated by a small bulldozer at 20 feet is a PPV of 0.004 inch per second. At the nearest residential structure, a loaded truck passing by would cause vibration that would be slightly more than barely perceptible but much less than distinctly perceptible, based on the thresholds for transient sources in Table 5. Consequently, the Project would generate ground-borne vibration from the use of loaded trucks. Such vibration may occasionally be vaguely perceptible by existing residents but would not be considered substantial because it would be well below what is considered distinctly perceptible.

**Table 5. Vibration Annoyance Potential Criteria Guidelines**

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

Source: California Department of Transportation. 2013. *Transportation and Construction Vibration Guidance Manual*. September. Available: [http://www.dot.ca.gov/hq/env/noise/pub/TCVGM\\_Sep13\\_FINAL.pdf](http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf). Accessed: June 21, 2019.

Notes:

- a. Transient sources create a single isolated vibration event (e.g., blasting or use of drop balls).
- b. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Operation of the small bulldozer would be considered a continuous source of vibration. The bulldozer would generate vibration at 20 feet that would be substantially below the barely perceptible PPV threshold of 0.01 inch per second, as shown in Table 5, above. In addition, the distance between the small bulldozer and the residences would often be much greater 20 feet; therefore, vibration would be even less perceptible in these instances. As such, use of the small bulldozer would not cause perceptible vibration at existing residences. Furthermore, vibration-generating activities would be limited to daytime hours and would not occur during nighttime hours. People are generally more sensitive to vibration during evening and nighttime hours when they may be sleeping. For the reasons discussed above, the impact of construction vibration related to annoyance at adjacent buildings is considered ***less than significant***.

## Criterion Section 15332(d): Air Quality

	Yes	No
Approval of the project would not result in any significant effects related to air quality.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Regulatory Setting

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). BAAQMD adopted thresholds of significance to assist lead agencies in the evaluation and mitigation of air quality impacts under CEQA. BAAQMD thresholds, which are incorporated in the 2017 California Environmental Quality Act Air Quality Guidelines (CEQA Guidelines),<sup>23</sup> establish the levels at which emissions of ozone precursors (reactive organic gases [ROGs] and nitrogen oxides [NO<sub>x</sub>]), particulate matter, local carbon monoxide (CO), and toxic air contaminants (TACs) would cause significant air quality impacts. The regulation of two fractions of emissions of particulate matter is based on aerodynamic resistance diameters equal to or less than 10 microns (PM<sub>10</sub>) and 2.5 microns (PM<sub>2.5</sub>). The air quality analysis below uses the 2017 BAAQMD thresholds to evaluate the potential impacts of the Project.

<sup>23</sup> 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](http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en). Accessed: June 2019.

## Operational Emissions

Operational criteria pollutant emissions would be generated primarily from mobile sources (i.e., vehicle trips). Other sources of emissions include consumer products, architectural coatings, and landscape equipment, along with energy use (e.g., natural gas).

BAAQMD provides screening-level sizes for land use projects in Table 3-1 of its CEQA Guidelines. As stated in the guidelines, “if a project meets the screening criteria in Table 3-1, a project would not result in the generation of operational-related criteria air pollutants and/or precursors that exceed the thresholds of significance.”<sup>24</sup> If a project meets the criteria, then a detailed analysis of operational criteria air pollutants (CAPs) is not required. The screening-level size for operational CAPs pertaining to the “condo/townhouse, general”<sup>25</sup> category is 451 dwelling units (DUs). Because the Project would provide 19 DUs, it would meet the screening criteria. A quantitative analysis is not required.

Table 3-1 of the CEQA Guidelines does not include a screening-level size for parking structures. Parking structures emit CAPs from vehicle trips and area sources (e.g., architectural coatings, consumer products, landscaping equipment). As discussed in Criterion Section 15332(d), Traffic, the new parking structure would not generate new vehicle trips, relative to existing conditions. Therefore, the parking structure would not result in any additional CAPs from mobile sources. Based on California Emissions Estimator Model (CalEEMod) defaults and a parking structure size of 6,000 gsf, area-source emissions would not exceed the BAAQMD thresholds.

The Project, which involves construction of a residential building, would meet the screening criteria and would not result in the generation of operational CAPs and/or precursors that would exceed BAAQMD’s thresholds of significance. Similarly, the new parking structure would result in minor emissions that would not exceed BAAQMD’s thresholds. The Project would have a ***less-than-significant*** impact on air quality during operation and would not contribute a significant level of air pollution that would degrade regional air quality within the SFBAAB.

## Construction Emissions

Construction of the Project has the potential to create short-term air quality impacts through the use of heavy-duty construction equipment, along with construction workers’ vehicle trips, truck trips for material hauling, earthmoving, the application of architectural coatings, and paving. Similar to operational CAPs, BAAQMD provides screening-level guidance for construction emissions. The screening-level size for construction CAPs pertaining to the “condo/townhouse, general” category is 240 DUs. Although the Project would result in 19 DUs, the Project would also require demolition activity; therefore, according to the 2017 CEQA Guidelines, the Project does not meet the screening criteria, and a quantitative analysis of construction-related CAPs is required.<sup>26</sup>

Construction emissions would be short term, occurring for approximately 1 year. To minimize criteria pollutant emissions, the Project would include specific design features. These include the use of EPA Tier 4 “final” engines, as described in Section 1, *Project Description*. Furthermore, the applicant would implement best management practices (BMPs) to control fugitive dust during construction. The BMPs are recommended by BAAQMD and required by the 2040 General Plan and Downtown Specific Plan.

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<sup>24</sup> Ibid.

<sup>25</sup> According to the CalEEMod User’s Guide, “condo/townhouse units are ownership units that have at least one other owned unit within the same building structure.”

<sup>26</sup> 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](http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en). Accessed: June 2019.

Criteria pollutant emissions generated by construction of the Project were quantified using CalEEMod, version 2016.3.2. Table 6 summarizes the results of emissions modeling. Model outputs are provided in Appendix C. The modeling, as summarized in Table 6, was developed with use of a construction schedule that begins in September 2019 and ends in February 2021.<sup>27</sup> However, after the modeling was completed, the construction schedule was updated (i.e., now beginning in August 2020 and ending in January 2022). Because construction is now anticipated to commence in August 2020, the emission results are considered conservative because on-road emission factors decrease over time.

**Table 6. Criteria Pollutant Emissions from Project Construction (pounds per day)**

Construction Year	ROG	NO <sub>x</sub>	CO	PM <sub>10</sub>		PM <sub>2.5</sub>	
				Dust	Exhaust	Dust	Exhaust
2020 <sup>a</sup>	7	6	22	1	< 1	< 1	< 1
2021	3	< 1	1	< 1	< 1	< 1	< 1
<i>BAAQMD Threshold</i>	<i>54</i>	<i>54</i>	—	<i>BMPs</i>	<i>82</i>	<i>BMPs</i>	<i>54</i>
<i>Exceed Threshold?</i>	<i>No</i>	<i>No</i>	—	—	<i>No</i>	—	<i>No</i>

Note:

<sup>a</sup> Demolition and Grading construction phases overlap during 2020. Table presents emissions during this period of overlap.

BAAQMD = Bay Area Air Quality Management District

BMPs = best management practices

CO = carbon monoxide

NO<sub>x</sub> = nitrogen oxide

PM<sub>2.5</sub> = particulate matter no more than 2.5 microns in diameter

PM<sub>10</sub> = particulate matter no more than 10 microns in diameter

ROG = reactive organic gas

As shown in Table 6, construction of the Project would not generate ROG, NO<sub>x</sub>, or particulate matter exhaust in excess of BAAQMD's numeric thresholds. Therefore, the Project would not result in the generation of construction-related CAPs that would exceed the numeric thresholds of significance. BAAQMD does not have quantitative threshold values for fugitive dust (PM<sub>2.5</sub> and PM<sub>10</sub>); however, BAAQMD considers implementation of BMPs for fugitive dust during construction to be adequate for reducing related air quality impacts to a less-than-significant level. Compliance with BAAQMD BMPs is required by Policy HP-3.12 in the 2040 General Plan and Policy SCA-3 in the Downtown Specific Plan. Accordingly, the Project would have a **less-than-significant** impact on air quality during construction and would not contribute a significant level of air pollution that would degrade regional air quality within the SFBAAB.

**Implement Feasible Control Measures for Construction Emissions of Criteria Pollutants (HP-3.12 and SCA-3).** The applicant shall ensure implementation of the following BMPs during Project construction, in accordance with BAAQMD standard requirements:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

<sup>27</sup> Although the previous overall construction schedule began in September 2019 and ended in February 2021, the operation of heavy-duty equipment would only have occurred from April 2020 to February 2021.

- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet-power vacuum street sweepers at least once per day. The use of dry-power sweeping shall be prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks that are to be paved shall be paved as soon as possible. Building pads shall be laid as soon as possible after grading, unless seeding or soil binders are used.
- Idling times shall be minimized, either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure, Title 13, Section 2485 of the California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- A publicly visible sign with the name and telephone number of the person to contact at the lead agency regarding dust complaints shall be posted. This person shall respond and take corrective action within 48 hours. BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

### Generation of Toxic Air Contaminants

The Project could expose sensitive populations to substantial pollutant concentrations from the generation of TACs during Project construction and operation. Construction of the Project would emit TACs in the form of diesel particulate matter (DPM) from heavy-duty vehicles and construction equipment. Operation of the Project could emit TACs from vehicular traffic.<sup>28</sup> BAAQMD recommends analyzing traffic on roadways with more than 10,000 vehicles per day. The Project would be expected to generate 67 net vehicle trips per day, which is considerably less than the 10,000 vehicles per day in the BAAQMD recommendation. Moreover, Project vehicle trips would be made in personal vehicles, the majority of which are gasoline operated and do not generate DPM. Therefore, any release of TACs from Project traffic would be minimal. A quantitative assessment of operational health risks was not performed because impacts would be ***less than significant***. The remainder of this discussion focuses on construction-related health risks.

BAAQMD recommends evaluating the potential impacts of TAC emissions on sensitive receptors within 1,000 feet of a project.<sup>29</sup> For the purposes of air quality analysis, there are numerous sensitive receptors within 1,000 feet of the Project, including adjacent residences and the Saint Catherine of Siena School, which is 450 feet south of the Project site. The health risk assessment (HRA), discussed below, focuses on risks at those locations. DPM concentrations and, therefore, health risks dissipate as a function of distance. They are also lower at receptors beyond 1,000 feet.

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<sup>28</sup> The Project does not include any stationary sources of operational TACs (e.g., generators).

<sup>29</sup> 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](http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en). Accessed: June 2019.

The HRA was performed to analyze the impact of DPM and PM<sub>2.5</sub> emissions from heavy-duty vehicles and construction equipment on sensitive receptors within 1,000 feet of the Project site. Based on BAAQMD's thresholds, a significant impact would occur if risks were to exceed 10 cancer cases per 1 million people, result in an acute or chronic non-cancer Hazard Index (HI) greater than 1.0, or result in ambient PM<sub>2.5</sub> concentrations greater than an annual average of 0.3 microgram per cubic meter (µg/m<sup>3</sup>).

In accordance with guidance from BAAQMD and the Office of Environmental Health Hazard Assessment (OEHHA), the HRA evaluates the incremental increase in the cancer risk, chronic HI, and PM<sub>2.5</sub> concentrations at specific receptor locations. Emissions of PM<sub>2.5</sub> from diesel-powered construction equipment and vehicles were used as the basis for calculating health risks associated with DPM, consistent with BAAQMD guidance. As discussed above, construction emissions were calculated using CalEEMod, version 2016.3.2.<sup>30</sup> The analysis assumes an 11-month construction schedule for operation of heavy duty equipment. Details regarding this schedule and the analysis are provided in Appendix C.

EPA's Air Quality Dispersion Modeling (AERMOD) system was used to model DPM and total PM<sub>2.5</sub> exhaust concentrations at the three highest maximally exposed individual receptors (MEIRs). On-site emissions were modeled as an area source, whereas off-site vehicle emissions were modeled as a line source. The on-site release height was assumed to be 8.37 feet, which represents the mid-range of the expected plume from frequently used construction equipment during daytime atmospheric conditions. The release height for line sources, representing on-road trucks, was also 8.37 feet, based on guidance from EPA.<sup>31</sup> Daily emissions from construction equipment were assumed to occur over a 9-hour period between 8:00 a.m. and 5:00 p.m. Monday through Friday. A receptor height of 5.9 feet at the three highest MEIRs was assumed. The AERMOD input parameters included 5 years of surface meteorological data from the SFO station, located about 3.2 miles west of the Project site, and 5 years of vertical profile meteorological data from the Oakland Airport station.

The cancer risk from on-site DPM emissions was conservatively assessed for children under the age of 2, beginning with exposure during the third trimester. Children under the age of 2 are the most sensitive, according to OEHHA's age-sensitivity factors for cancer risk. It was assumed that children would be continuously exposed to average concentrations of DPM over the entire duration of Project construction. Modeling assumptions and outputs are provided in Appendix C.

The results for the construction HRA are summarized in Table 7 and compared to BAAQMD's thresholds. All risks would be below the thresholds with implementation of design features, including Tier 4 equipment, and BAAQMD's recommended BMPs. Therefore, this impact would be ***less than significant***.

### Cumulative Health Risk Assessment

Health impacts associated with the Project have been combined with health impacts from off-site sources to create an estimate of the cumulative impact. This combination of risks is conservative in that it assumes that the impacts from all sources are occurring within the same time frame.

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<sup>30</sup> California Air Pollution Control Officers Association. 2016. *CalEEMod*. Version 2016.3.2. Available: <http://www.caleemod.com/>.

<sup>31</sup> U.S. Environmental Protection Agency. 2012. *Haul Road Workgroup Final Report Submission*. March 2. Available: [https://www3.epa.gov/ttn/scram/reports/Haul\\_Road\\_Workgroup-Final\\_Report\\_Package-20120302.pdf](https://www3.epa.gov/ttn/scram/reports/Haul_Road_Workgroup-Final_Report_Package-20120302.pdf).

**Table 7. Summary of Health Risk Assessment for DPM and PM<sub>2.5</sub> Emissions during Construction**

<b>Receptor Designation</b>	<b>Excess Lifetime Cancer Risk (in 1 million)</b>	<b>Maximum Chronic HI</b>	<b>Maximum Annual Average PM<sub>2.5</sub> Concentration (µg/m<sup>3</sup>)</b>
MEIR	7.13	0.01	0.05
Second-highest MEIR	6.97	0.01	0.05
Third-highest MEIR	6.66	0.01	0.05
BAAQMD Thresholds	10	1	0.3

Source: Appendix C.

Note: µg/m<sup>3</sup> = micrograms per cubic meter

BAAQMD recommends using its online screening tools to evaluate TAC emissions from stationary and mobile sources within 1,000 feet of a project site. The screening tools provide conservative estimates of the extent of the contribution from existing TAC sources to the cancer risk, HI, and/or PM<sub>2.5</sub> concentrations in a community. As summarized in Table 8, sources of TAC emissions near the Project site include one gas dispensing facility, one sub-slab depressurization system, one diesel generator, two soil vapor extraction systems, and one coating operation. Screening values for the gas station were determined with use of BAAQMD's Stationary-Source Screening Analysis Tool. The screening values were refined using BAAQMD's Gasoline Dispensing Facility Distance Multiplier Tool because the gas station is more than 66 feet from the three highest MEIRs (see Appendix C for further information). Health risk values for the non-gas dispensing facilities were calculated using BAAQMD's Health Risk Calculator, based on emissions data provided by BAAQMD and refined to represent the distance from the facility to the three highest MEIRs (see Appendix C for further information). Screening values for the cancer risk and PM<sub>2.5</sub> concentrations at railways, highways, and major roadways were determined using data provided by BAAQMD, which are based on the cancer risk and PM<sub>2.5</sub> concentrations in a 20- by 20-meter grid in the San Francisco Bay Area. These discrete values were then interpolated to estimate the cancer risk and PM<sub>2.5</sub> concentrations at the three highest MEIRs. The cumulative increase in the cancer risk, chronic HI, and PM<sub>2.5</sub> concentrations from existing TAC sources and the Project are compared to BAAQMD's cumulative thresholds in Table 8.

As shown in Table 8, combined total cumulative cancer risks, hazard impacts, and PM<sub>2.5</sub> concentrations at the three highest MEIRs would not exceed BAAQMD's thresholds. Therefore, the contribution of the Project to a significant impact would not be considerable. This impact would be ***less than significant***.

### Odors

Typical odor sources are generally 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 residential development, the Project would not be expected to generate significant odors. Land uses immediately surrounding the Project site include mixed commercial and light industrial land uses, which would also not be expected to generate significant odors. Therefore, the Project would have a ***less-than-significant*** impact related to odors.



**Table 8. Summary of Risks and Hazards from nearby TAC Sources**

<b>Source</b>	<b>Cancer Risk (in 1 million)</b>	<b>Chronic HI</b>	<b>PM<sub>2.5</sub> Concentration (µg/m<sup>3</sup>)</b>
<i>MEIR</i>			
Project construction	7.13	0.01	0.05
Stationary sources	4.05	0.02	< 0.01
Railways	6.78	0	0.01
Highways	6.39	0	0.14
Roadways	0.08	0	< 0.01
<b>Total:</b>	<b>24</b>	<b>0.03</b>	<b>0.21</b>
<i>Second-highest MEIR</i>			
Project construction	6.97	0.01	0.05
Stationary sources	4.89	0.02	< 0.01
Railways	7.08	0	0.01
Highways	6.44	0	0.14
Roadways	0.08	0	< 0.01
<b>Total:</b>	<b>26</b>	<b>0.03</b>	<b>0.21</b>
<i>Third-highest MEIR</i>			
Project construction	6.66	0.01	0.05
Stationary sources	4.44	0.02	< 0.01
Railways	6.97	0	0.01
Highways	6.42	0	0.14
Roadways	0.08	0	< 0.01
<b>Total:</b>	<b>25</b>	<b>0.03</b>	<b>0.21</b>
BAAQMD Cumulative Threshold	100	10	0.80
Exceeds?	No	No	No

Source: Appendix C.

Notes: µg/m<sup>3</sup> = micrograms per cubic meter

The cancer risk, chronic HI, and PM<sub>2.5</sub> for gas stations are scaled, based on the Gasoline Dispensing Facility Distance Multiplier Tool, per BAAQMD guidance.

## Criterion Section 15332(d): Water Quality

	Yes	No
Approval of the project would not result in any significant effects related to water quality.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Existing Conditions

The Project site is within the San Mateo Creek-Frontal San Francisco Bay Estuaries watershed,<sup>32</sup> which drains much of the eastern portion of San Mateo County into San Francisco Bay (Bay). The Bay is approximately 1 mile north of the Project site. Local drainage is managed by urban storm sewers. The existing site includes two residential structures, pavement, and a small landscaped yard. Groundwater on-site occurs at a depth of 15 to 20 feet below the ground surface.<sup>33</sup> The groundwater gradient is generally toward the north-northeast but shows significant seasonal variability. Several leaking underground storage tank sites and other cleanup sites are in the vicinity of the Project site. Although these have contributed to groundwater contamination near the site, on-site groundwater was not identified as contaminated. There are no leaking underground storage tanks present on the 128 Lorton Avenue property. The full extent of groundwater and other contamination is further discussed in Criterion 15300.2(e): Hazardous Waste Sites.

### Project Conditions

Stormwater runoff from the Project site ultimately drains into the Bay. Currently, the Project site includes two residential buildings, surface pavement, and a small front lawn area. The Project would decrease the amount of pervious area by approximately 1,570 sf. Runoff from the Project site would be directed to permeable pavers, which would be installed as a part of this Project. Runoff would eventually be directed to a storm drain that would be extended as a part of the Project.

Surface water runoff from the Project site would be regulated under the National Pollutant Discharge Elimination System (NPDES), which is enforced locally by the San Francisco Bay Regional Water Quality Control Board (Regional Water Board) and the City's SCAs. Because of the high potential for contaminated soil vapors on-site, which could intrude into groundwater, any work on the site will need to be conducted in coordination with the San Mateo County Department of Environmental Health and the Regional Water Board. Compliance with existing stormwater control regulations and the City's SCAs would ensure that the Project would not result in any significant effects related to water quality. Therefore, the Project would be consistent with the requirement of the Class 32 exemption under CEQA Guidelines Section 15332(d) regarding Project impacts on water quality.

### Stormwater Runoff

The Project would be required to adhere to the NPDES Municipal Regional Permit (MRP) under Regional Water Board Order R2-2015-0049. Per the MRP, the Project would be required to implement BMPs during construction. These BMPs would include measures for erosion control, runoff and runoff control,

<sup>32</sup> U.S. Environmental Protection Agency. 2019. *San Francisco Bay Delta Watershed Map*. Last updated: March 5, 2019. Region 9 GIS/Technology Center. Available: <https://www.arcgis.com/apps/OnePane/basicviewer/index.html?appid=387531ac0c094da5b6139b890958fca6>. Accessed: August 2019.

<sup>33</sup> RNC Environmental, LLC. 2019. *Phase I Environmental Site Assessment: 128 Lorton, APN 029-231-210, 128 Lorton Avenue, Burlingame, San Mateo County, California*. February 11, page 6. (RNC Project Number 1605A.) Prepared for Pacific West Communities, Inc., Eagle, ID.

sediment control, active treatment systems, good site management, and non-stormwater management (see Section C.6.c of the MRP). Implementation of these BMPs during construction would reduce or eliminate pollutants associated with construction activities in stormwater runoff.

Stormwater runoff during the operational phase of the Project would be subject to Provision C.3 of the MRP, which requires the Project to implement stormwater design features. The Project would satisfy MRP requirements by installing permeable pavers (with a water barrier for foundation protection). Runoff would be directed to these permeable pavers and eventually directed to a storm drain, which would be extended as a part of the Project. Compliance with existing stormwater regulations would ensure that both construction and operation of the Project would result in ***less-than-significant*** impacts on water quality related to stormwater runoff.

## Groundwater

As described in greater detail in Criterion 15300.2(e): Hazardous Waste Sites, although the site is not known to contain contaminated groundwater, contaminated groundwater is present nearby. Therefore, the Project site very likely contains contaminated soil vapors. These soil vapors could intrude upon groundwater resources and cause groundwater contamination. Therefore, the applicant would incorporate construction design strategies that would ensure that soil vapors would not travel down pathways created during Project construction (e.g., along utility corridors, in elevator shafts, etc.). In addition, if required to comply with air quality standards, the Project would install a sub-slab vapor barrier and possibly a positive ventilation system to protect indoor air quality.

Because the proposed building would be constructed at grade, significant excavation is not expected; dewatering is therefore unlikely to be required as part of Project construction. However, if construction occurs during a period with high groundwater levels and temporary dewatering is required, any encountered groundwater would be tested for contaminants. Furthermore, special handling and disposal procedures would be implemented, and the Regional Water Board would be notified. If contaminated groundwater is encountered, the applicant would be required to comply with the Regional Water Board's Volatile Organic Compounds and Fuel General Permit (Order No. R2-2017-0048). Although contaminated groundwater is known to occur at the surface parking lot across the street, a groundwater remediation system is in operation at the site to address groundwater and soil vapor contamination concerns.

Prior to receiving a building permit or other construction-related permit, final design would be approved by the Burlingame Department of Public Works. Furthermore, although it is not currently known if dewatering will be required, permanent groundwater dewatering is not allowed in the Downtown Specific Plan area, in accordance with SCA-1. Compliance with SCA-1, design strategies, and existing regulations would ensure that the Project's potential impact related to groundwater would be reduced to a ***less-than-significant*** level.

**Prohibit Permanent Groundwater Dewatering (SCA-1).** For development under the Downtown Specific Plan, if subgrade structures are proposed, the applicant shall prepare a geotechnical study to identify the depth to the seasonal high water table at the Project site. No permanent groundwater dewatering shall be allowed. Instead, all residential uses must be elevated to above the seasonal high water table, and all areas for non-residential uses shall be flood proofed and anchored, in accordance with floodplain development requirements, to the design depth, as recommended by the geotechnical engineer. The final design shall be prepared by a qualified professional engineer and approved by the Burlingame Department of Public Works prior to receiving a building permit.

## Criterion Section 15332(e): Utilities and Public Services

	Yes	No
The site can be adequately served by all required utilities and public services.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Project site is 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's current population of approximately 30,118 is served by existing utilities and public service providers.<sup>34</sup> The Project would include the construction of 19 units. Using the citywide persons-per-household ratio of 2.49,<sup>35</sup> the Project could induce population growth with the addition of up to 47 new residents.<sup>36</sup> However, the anticipated population growth at the Project site would be consistent with the growth anticipated in the 2040 General Plan Housing Element and the Burlingame Downtown Specific Plan. As discussed below, the Project would be adequately served by all required utilities and public services.

**Water.** The City of Burlingame purchases all of its potable water from the San Francisco Public Utilities Commission (SFPUC) regional water system. Approximately 85 percent of the water supply originates in the Hetch Hetchy watershed in Yosemite National Park, then flows down the Tuolumne River to Hetch Hetchy Reservoir. The remaining 15 percent of the water supply originates locally in the Alameda and Peninsula watersheds and is stored in six different reservoirs in Alameda and San Mateo Counties.<sup>37</sup> According to the City of Burlingame 2015 Urban Water Management Plan (UWMP), the city's average water demand between 2011 and 2015 was a total of 1,458 million gallons, which is equivalent to 3.99 million gallons per day (mgd), or 76 percent of the city's allotted 5.23 mgd.<sup>38</sup>

According to the 2015 UWMP for the city of Burlingame, daily residential per capita water use in the city of Burlingame was 113 gallons per day (gpd).<sup>39</sup> The confirmed daily per capita water use target for 2020 is 135 gpd.<sup>40</sup> Using 135 gpd as a conservative figure, and assuming a conservative on-site population of 47, daily water demand would be approximately 6,345 gpd. As explained above, the city uses an average of 3.99 mgd of its 5.23 mgd water supply; therefore, adequate water supplies are available to serve the Project site. No expanded or new potable water facilities would be required, resulting in a **less-than-significant** impact.

**Wastewater.** The Burlingame Department of Public Works services the city's wastewater system. Wastewater flows are carried to the wastewater treatment plant (WWTP) at 1103 Airport Boulevard, which serves the entire city of Burlingame as well as approximately one-third of Hillsborough. The average dry-weather flow of wastewater treated at the WWTP has remained fairly constant, at

<sup>34</sup> Department of Finance. 2020. *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2010–2020, with 2010 Census Benchmark*. Available: <http://dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>. Accessed: June 2020.

<sup>35</sup> U.S. Census Bureau. 2020. *Persons per Household, 2014–2018*. Available: <https://www.census.gov/quickfacts/fact/table/burlingamecitycalifornia/HSD310217#HSD310217>. Accessed: June 2020.

<sup>36</sup> The addition of 47 residents as a result of the Project is conservative. The citywide average is 2.49 persons per household, which includes single-family residences, multi-family residences, and mobile homes. Because the Project is a multi-family use, with mainly one- and two-bedroom units, it is expected that the household size would be significantly smaller.

<sup>37</sup> Erler & Kalinowski, Inc. 2016. *2015 Urban Water Management Plan for the City of Burlingame*. June. Available: [https://www.burlingame.org/document\\_center/Water/2015%20Urban%20Water%20Management%20Plan.pdf](https://www.burlingame.org/document_center/Water/2015%20Urban%20Water%20Management%20Plan.pdf). Accessed: August 2019.

<sup>38</sup> Ibid. (see Table 3-2 of the UWMP on page 20 of 120).

<sup>39</sup> Ibid. (see Table 5-2 of Appendix A).

<sup>40</sup> Ibid. (see Table 5-1 of Appendix A).

approximately 3.0 to 3.5 mgd, which is approximately 55 to 64 percent of the facility's 5.5 mgd capacity.<sup>41</sup> As discussed above, the Project would demand approximately 6,345 gpd of water; therefore, assuming a one-to-one ratio, the Project would generate approximately 6,345 gpd of wastewater. Because the WWTP treats only a fraction of its permitted wastewater capacity, adequate wastewater treatment capacity is available, and the Project would not exceed wastewater treatment requirements. Impacts would be *less than significant*.

**Stormwater.** Stormwater collection in the Project vicinity relies on a system of storm drains that eventually feed into the Bay. The Project is expected to decrease the area of pervious surfaces by approximately 1,570 sf. Nonetheless, the Project would include an on-site drainage system to accommodate any increases in runoff from the site. Specifically, permeable pavers would be included as part of the Project to help ensure off-site runoff would not increase over existing conditions. The existing stormwater infrastructure has adequate capacity for serving the Project site; no expanded or new off-site drainage facilities would be required, beyond minor improvements that may be included as a part of the Project. Impacts related to stormwater drainage would be *less than significant*.

**Solid Waste.** The city is within the service area of RethinkWaste, 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 RethinkWaste service area. Recyclables and organic solid waste are taken by Recology trucks to the Shoreway Environmental Center in San Carlos for sorting. The Shoreway Environmental Center is owned by Rethink Waste and operated by South Bay Recycling on behalf of Rethink Waste. Solid waste and recyclables received at the Shoreway Environmental Center are processed and sent to the appropriate facility, including the Corinda Los Trancos Landfill (formerly Ox Mountain Landfill), which is in Half Moon Bay. The Corinda Los Trancos Landfill had a maximum permitted capacity of 60,500,000 cubic yards and, as of December 31, 2015, a remaining capacity of 22,180,000 cubic yards. The Corinda Los Trancos Landfill has an estimated closure date of 2034.<sup>42</sup>

Construction of the Project would result in demolition waste from the pavement and the two buildings on the site. In accordance with the Municipal Code, the applicant would be required to develop a Construction Demolition and Recycling Plan to comply with the City of Burlingame Construction and Demolition Recycling Ordinance (Chapter 8.17 of the Municipal Code). The code requires salvage or recycling of at least 60 percent of construction-related solid waste. Therefore, construction of the Project is not expected to have an impact on existing landfills. 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 of solid waste.<sup>43</sup> Therefore, with a conservative anticipated population of up to 47, the Project could generate approximately 324 pounds per day of solid waste in the form of garbage, recycled material, and compost. Although trash receptacles would be provided in the parking structure, they are not expected to generate a significant amount of waste. The

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<sup>41</sup> Ibid. (see page 56 of 120).

<sup>42</sup> California Department of Resources Recycling and Recovery. 2019. *SWIS Facility Detail: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002)*. Available: <https://www2.calrecycle.ca.gov/SWFacilities/Directory/41-AA-0002/Detail>. Accessed: August 2019.

<sup>43</sup> California Department of Resources Recycling and Recovery. 2019. *Jurisdiction Diversion/Disposal Rate Summary (2007–current)*. Jurisdiction: Burlingame. Available: <https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionPost2006>. Accessed: June 2020.

Shoreway Environmental Center is permitted to receive 3,000 tons of refuse per day.<sup>44</sup> Once collected and sorted at Shoreway, solid waste is transported to Corinda Los Trancos Landfill, which is permitted to receive 3,598 tons per day.<sup>45</sup> Solid waste generated by operation of the Project would represent less than 0.05 percent of the permitted capacity of Shoreway and Corinda Los Trancos Landfill, respectively. As such, Shoreway and the Corinda Los Trancos Landfill would have adequate capacity to serve the Project, resulting in a ***less-than-significant*** impact.

**Fire Protection Services.** The Central County Fire Department (CCFD) provides fire protection services within Burlingame, Millbrae, and Hillsborough. In total, the service area covers almost 15 square miles, with a residential population of approximately 61,344.<sup>46</sup> CCFD has 87 full-time employees, including 78 uniformed personnel.<sup>47</sup> There are six fire stations in the CCFD's jurisdiction,<sup>48</sup> two of which are in Burlingame. The closest is Fire Station No. 34, at 799 California Drive, approximately 0.66 mile west 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 code standards. The Project would be required to comply with all applicable CCFD codes and regulations. It would also 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. Therefore, the Project would not increase the need for fire services, additional personnel, and/or additional equipment to the extent that new fire facilities would need to be constructed, resulting in a ***less-than-significant*** impact.

**Police Protection Services.** The Burlingame Police Department (BPD) provides emergency police services within a 5-square-mile area with approximately 30,000 residents. BPD has one police station at 1111 Trousdale Drive. BPD employs 69 men and women, including 40 sworn officers, resulting in a ratio of 1.33 officers per 1,000 residents.<sup>49</sup> 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 as necessary to meet community safety needs.<sup>50</sup>

The Project site is currently served by the BPD. The addition of up to 47 residents 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

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<sup>44</sup> RethinkWaste. 2019. *About Shoreway*. Available: <http://www.rethinkwaste.org/shoreway-facility>. Accessed: August 2019.

<sup>45</sup> California Department of Resources Recycling and Recovery. 2019. *SWIS Facility Detail: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002)*. Available: <https://www2.calrecycle.ca.gov/SWFacilities/Directory/41-AA-0002/Detail>. Accessed: August 2019.

<sup>46</sup> Central County Fire Department. 2019. *Fiscal Year 2019–2020 Adopted Budget*. Available: <http://www.ccfdonline.org/wp-content/uploads/2019/05/ADOPTED-BUDGET-FY19-20-WEB.pdf>. Accessed: June 2020.

<sup>47</sup> Ibid.

<sup>48</sup> Ibid.

<sup>49</sup> City of Burlingame Police Department. 2018. *About Us*. Available: [https://www.burlingame.org/departments/police\\_department/about\\_us.php](https://www.burlingame.org/departments/police_department/about_us.php). Accessed: June 2020.

<sup>50</sup> Ibid.

would be minor compared with the BPD service ratio. Therefore, the Project would not increase the need for police services or staffing to the extent that new police facilities would need to be constructed, resulting in a ***less-than-significant*** impact.

**Schools.** The Burlingame School District (BSD) includes six elementary schools and one intermediate school,<sup>51</sup> with a total enrollment of approximately 3,350.<sup>52</sup> Lorton Avenue is served by Washington Elementary School.<sup>53</sup> In addition, Burlingame High School, part of the San Mateo Union High School District (SMUHSD), is also located in Burlingame.<sup>54</sup> In total, the SMUHSD serves approximately 9,000 students, and enrollment grows every year.<sup>55</sup>

The Project would include 19 housing units. BSD uses a student generation rate of 0.2067 student per housing unit for elementary schools and a generation rate of 0.0525 for middle schools.<sup>56</sup> For high schools, the state's generation rate is 0.2 student per housing unit.<sup>57</sup> Using these student generation rates, the 19 new housing units could result in up to four elementary school students, one middle school student, and four high school students, which would not have a significant impact on either school district. In addition, non-residential development, including 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. Therefore, impacts related to schools would be ***less than significant***.

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<sup>51</sup> Burlingame School District. 2018. *Burlingame School District*. Available: <https://www.bsd.k12.ca.us/>. Accessed: June 2020.

<sup>52</sup> SchoolWorks, Inc. 2016. *Level 1 – Developer Fee Justification Study for Burlingame School District*. Available: <http://bsd-ca.schoolloop.com/file/1236520987086/1403330967436/5172072493375788958.pdf>. Accessed: June 2020.

<sup>53</sup> Burlingame School District. 2018. *District Boundaries*. Available: <https://www.bsd.k12.ca.us/districtboundaries1617>. Accessed: June 2020.

<sup>54</sup> Burlingame High School. 2018. *Burlingame High School*. Available: <https://www.smuhsd.org/burlingamehigh>. Accessed: June 2020.

<sup>55</sup> San Mateo Union High School District. 2018. *Welcome to the San Mateo Union High School District!* Available: <https://www.smuhsd.org/domain/46>. Accessed: June 2020.

<sup>56</sup> SchoolWorks Inc. 2016. *Level 1 – Developer Fee Justification Study for Burlingame School District*. Available: <http://bsd-ca.schoolloop.com/file/1236520987086/1403330967436/5172072493375788958.pdf>. Accessed: June 2020. Single-family and multi-family residential units combined.

<sup>57</sup> State Allocation Board, Office of Public School Instruction. 2008. *Enrollment Certification Projection*. Available: <https://www.dgsapps.dgs.ca.gov/OPSC/ab1014/sab50-01instructions.pdf>. Accessed: June 2020.

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## Section 4

# Exceptions to Categorical Exemptions Checklist

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In addition to investigating the applicability of CEQA Guidelines Section 15332 (Class 32), this CEQA document also assesses whether any of the exemptions to qualifying for the Class 32 categorical exemption for an infill project are present. The following analysis compares the criteria of CEQA Guidelines Section 15300.2 (Exceptions) to the Project.

### Criterion 15300.2(a): Location

	Yes	No
Is there an exception to the Class 32 exemption for the project due to its location in a particularly sensitive environment such that the project may affect an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

This possible exception applies only to CEQA exemptions under Classes 3, 4, 5, 6, or 11. Because the Project qualifies under a Class 32 urban infill exemption, this criterion is not applicable. The Project is located within a developed urban area; it is not located within a sensitive environment. Designated hazardous concerns in the Project vicinity are evaluated under Criterion 15300.2(e), below.

### Criterion 15300.2(b): Cumulative Impact

	Yes	No
Is there an exception to the Class 32 exemption for the project due to significant cumulative impacts of successive projects of the same type and in the same place over time?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Generally, the effects of the Project would be beneficial because it would help Burlingame increase its housing supply, including the number of affordable housing units. The Project would place new residents in an area that is well served by existing transit, thereby reducing residents' VMT. The Project would include demolition of a development with four residential units within two buildings. The two buildings would be replaced with a single structure containing 19 residential units, all of which would be situated above an at-grade parking facility with 17 parking spaces. The development would be located in an urban neighborhood that is already served by utilities and public services, including public transportation. Any construction effects would be temporary and confined to the Project vicinity. In addition, impacts would be reduced to a less-than-significant level through compliance with the Downtown Specific Plan, SCAs, and other applicable regulatory requirements.

It is possible that construction of the adjacent parking garage (Lot N) as well as the residential development across the street (Lot F), both of which are approved, would occur concurrently with construction at 128 Lorton Avenue. The CEQA Class 32 infill exemption document for the Village at Burlingame Project states that Tier 2 and Tier 4 equipment would be used during construction and that a Construction Noise Control Plan, recommended BMPs from BAAQMD, and applicable SCAs from the Downtown Specific Plan would be implemented.<sup>58</sup> Likewise, the 128 Lorton Avenue Project would require implementation of similar design features. Implementation of design features would ensure that temporary construction impacts would not result in cumulative impacts. Therefore, the exception under CEQA Guidelines Section 15300.2(b) does not apply to the Project.

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<sup>58</sup> City of Burlingame. 2018. *The Village at Burlingame CEQA Class 32 Infill Exemption*. December.

## Criterion 15300.2(c): Significant Effect

	Yes	No
Is there an exception to the Class 32 exemption for the project because there is a reasonable possibility that it will have a significant effect on the environment due to unusual circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No known unusual circumstances, as applicable to the Project or its site, would result in a significant effect on the environment (see also the further discussion under Criterion 2[e] regarding hazardous materials, below). Therefore, the exception under CEQA Guidelines Section 15300.2(c) does not apply to the Project.

## Criterion 15300.2(d): Scenic Highway

	Yes	No
Is there an exception to the Class 32 exemption for the project because it 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Project site has no trees, historic buildings, rock outcroppings, or similar visual resources that are located within an officially designated state scenic highway. The nearest scenic highway, Interstate 280, is approximately 2.3 miles south of the Project site, which is not visible from the freeway. Therefore, the exception under CEQA Guidelines Section 15300.2(d) does not apply to the Project.

## Criterion 15300.2(e): Hazardous Waste Sites

	Yes	No
Is there an exception to the Class 32 exemption for the project because it is located on a site that is included on a list compiled pursuant to Section 65962.5 of the Government Code?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 (DTSC), the State Water Resources Control Board (SWRCB), the California Department of Public Health (DPH),<sup>59</sup> and the California Department of Resources Recycling and Recovery (CalRecycle) 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 the California Environmental Protection Agency (CalEPA). As summarized in Table 9, the Project site is not identified on any 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 to the Project.

Although the site has not been identified on any lists compiled pursuant to Government Code Section 65962.5, previous environmental assessments and investigations have identified residual soil and groundwater contamination on the Project site. These potential hazardous materials concerns associated with the Project site are discussed further below.

<sup>59</sup> Formerly the California Department of Health Services.

**Table 9. Summary of Cortese List Search Results for 128 Lorton Avenue, Burlingame, California**

<b>Government Code Section</b>	<b>Responsible Agency</b>	<b>List Description</b>	<b>Project Identified on List?</b>
65962.5(a)(1)	DTSC	List of hazardous waste facilities where DTSC have taken or contracted for corrective action because the owner failed to comply with an order or DTSC determined that immediate corrective action was necessary to abate an imminent or substantial endangerment.	No
65962.5(a)(2)	DTSC	List of all land designated as hazardous waste property or border zone property.	No
65962.5(a)(3)	DTSC	List of probable occurrences of unauthorized disposal of hazardous waste on, under, or into land that the city, county, or state agency owns or leases. As of April 1, 2016, DTSC has not maintained or submitted a list of such records to CalEPA but indicated that it plans to do so in the future.	No
65962.5(a)(4)	DTSC	List of sites where a hazardous substance release has been confirmed by on-site sampling and a response action is required.	No
65962.5(a)(5)	DTSC	List of sites in the Abandoned Site Assessment Program. DTSC concluded the program in the 1990s but no longer maintains or submits a list of records to CalEPA.	No
65962.5(b)	DPH	List of all wells with public drinking water that contain detectable levels of organic contaminants or require water quality analysis. Because all analyses required for this list were to have been completed by 1988, DPH no longer submits these records to CalEPA. In addition, DPH does not provide the locations of wells with public drinking water.	No
65962.5(c)(1)	SWRCB	List of all underground storage tanks for which unauthorized release reports have been filed. The SWRCB provides information about leaking underground storage tank cleanup sites in its GeoTracker database. Reports are filed each year, going back to fiscal year 1996/1997. According to SWRCB, both active and closed sites are included on the list.	No
65962.5(c)(2)	SWRCB	List of all solid waste disposal facilities from which there is a migration of hazardous waste into water.	No
65962.5(c)(3)	SWRCB	List of sites for which a cease-and-desist order or a cleanup or abatement order was issued that concerns a discharge of wastes that are considered hazardous.	No

Government Code Section	Responsible Agency	List Description	Project Identified on List?
65962.5(d)	CalRecycle	Former list of solid waste disposal facilities from which there is a known migration of hazardous waste. Subsequent legislation (Assembly Bill 1220, the Solid Waste Disposal Regulatory Reform Act of 1993) superseded this requirement; lists compiled under Sections 65962.5(c)(2) and/or (c)(3) should capture this information.	No
Source: RNC Environmental, LLC. 2019; Department of Toxic Substances Control, 2019; State Water Resources Control Board 2019.			

In February 2019, a Phase I Environmental Site Assessment (ESA) was prepared for the Project site in accordance with American Society for Testing and Materials (ASTM) Practice E1527-13. The Phase I ESA reported that a recognized environmental condition<sup>60</sup> exists in the form of soil vapor intrusion originating from nearby sources of groundwater. This created a commingled plume of contaminants, including petroleum-related volatile organic compounds and chlorinated solvents, in the groundwater.<sup>61</sup> This Phase I ESA stated that the sources of groundwater contamination are one-half block north of the property, along Howard Avenue—specifically, within 0.1 mile for petroleum hydrocarbon contamination (i.e., a leaking underground fuel storage tank) and 0.3 mile for other chemical contamination (i.e., current and former dry-cleaning facilities). Monitoring reports submitted to the SWRCB indicate that contaminated groundwater does not extend to areas beneath the Project site.

Because the possibility exists that soil vapors would encroach upon the Project site, the applicant would implement features to protect residents and indoor air quality. As summarized in Section 1, *Project Description*, this could include construction design strategies, sub-slab vapor barriers, a positive ventilation system, or proper disposal of potentially contaminated groundwater and soil.

Because the Project site is not on any list compiled pursuant to Section 65962.5 of the Government Code, the exception under CEQA Guidelines Section 15300.2(e) does not apply to the Project. Impacts would be ***less than significant***.

<sup>60</sup> A recognized environmental condition, according to ASTM E1527-13, indicates “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property (1) due to a 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; *de minimis* conditions are not recognized environmental conditions.”

<sup>61</sup> RNC Environmental, LLC. 2019. *Phase I Environmental Site Assessment: 128 Lorton, APN 029-231-210, 128 Lorton Avenue, Burlingame, San Mateo County, California*. May 12. (RNC Project Number 1605A.) Prepared for Pacific West Communities, Inc., Eagle, ID.

## Criterion 15300.2(f): Historical Resources

	Yes	No
Is there an exception to the Class 32 exemption for the project because it may cause a substantial adverse change in the significance of a historical resource?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Project site is immediately east of Burlingame's central business district and approximately 250 feet east of the Howard Avenue commercial corridor. The Project site is surrounded by one- or two-story commercial and residential buildings that represent a range of construction eras. The Project site contains two residential buildings from 1912. Although both of these buildings are more than 50 years old, according to the inventory of historic resources that was conducted for the Downtown Specific Plan, neither has the integrity needed to be considered a historical resource.<sup>62</sup> Therefore, the Project site contains no buildings, structures, or objects that can be considered historical resources for the purposes of CEQA review. As a result, the Project would not cause a substantial adverse change in the significance of any historical resources within the Project site. However, projects may have the potential to cause a substantial adverse change in the significance of adjacent historical resources. Substantial adverse change would occur if new construction within the Project site were to alter the setting of adjacent resources or if Project-related construction were to create ground-borne vibration and damage the physical characteristics that convey the historical significance of the resources. There are no properties adjacent to the Project site that have previously been listed in, or determined to be eligible for listing in, the National Register of Historic Places (NRHP)<sup>63</sup> or California Register of Historical Resources (CRHR).<sup>64</sup> Furthermore, none of the adjacent properties are included in a local register of historical resources or identified in a qualified historical resources survey. Therefore, no property adjacent to the Project site has been determined to be a historical resource for the purposes of CEQA review.

Two residential buildings at 120 Lorton Avenue and 124 Lorton Avenue were constructed prior to 1969, based on information provided by the City.<sup>65</sup> Although they are eligible with respect to age, they have not been previously considered for CEQA historical resource status. The two- and three-story, multi-unit buildings were designed in the Mid-Century Modern architectural style and incorporate exterior walkways and balconies; the property at 120 Lorton Avenue also incorporates ground-level tuck-under parking. These two properties are more than 50 years old and therefore may qualify for listing in the CRHR. The properties adjacent to 128 Lorton on the opposite side do not contain structures; the properties contain a recently constructed parking lot.

Although the two adjacent properties with buildings constructed before 1969 have not been previously evaluated for eligibility for listing in the CRHR, the Project does not have the potential to cause a substantial adverse change in the significance of the adjacent properties. Construction of a multi-story building within the Project site would not be expected to degrade the setting of adjacent age-eligible properties to the point that their significance would be materially impaired, were they to be considered historical resources under CEQA.

<sup>62</sup> Carey & Co., Inc. 2008. *Inventory of Historic Resources, Burlingame Downtown Specific Plan, Parcel Database*.

<sup>63</sup> National Park Service. 2019. *National Register Listings*. April 4. Available: [https://www.nps.gov/subjects/nationalregister/upload/national\\_register\\_listed\\_20190404.xlsx](https://www.nps.gov/subjects/nationalregister/upload/national_register_listed_20190404.xlsx). Accessed: July 2019.

<sup>64</sup> Office of Historic Preservation. 2019. *California Historical Resources*. California State Parks. Available: <http://ohp.parks.ca.gov/listedresources>. Accessed: July 2019.

<sup>65</sup> Hurin, Ruben. Planning manager, City of Burlingame. July 11, 2019—email to Erin Efner and Aileen Cole regarding database underlying the Inventory of Historic Resources for the city of Burlingame.

The Project also does not have the potential to damage the adjacent age-eligible properties, were they to be found eligible historical resources under CEQA. The equipment with the greatest potential to cause ground-borne vibration during construction would be a loaded truck or a small bulldozer. As described in greater detail in Section 15332(d), Noise, damage is not anticipated at any buildings in the vicinity of the Project site. Ground-borne vibration created by Project-related construction activities would be expected to attenuate to the degree that it would remain below the damage thresholds for “historic and some old buildings” and “older residential structures” (the two property categories specified in Caltrans’ *Transportation and Construction Vibration Guidance Manual* that apply to the adjacent age-eligible properties). As a result of the vibration analysis, it has been determined that construction related to the Project is not expected to damage the adjacent age-eligible buildings such that their physical characteristics would be altered. Therefore, the Project would not cause a substantial adverse change in the historical significance of the adjacent age-eligible buildings, were they to be considered historical resources under CEQA.

In consideration of the analysis outlined above, the exception under CEQA Guidelines Section 15300.2(d) does not apply to the Project. Impacts would ***be less than significant***.

## Section 5

# Conclusions

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On the basis of the evidence provided above, the Project is eligible for a Class 32 categorical exemption, in accordance with Section 15332, Infill Development Projects, of the CEQA Guidelines. Based on City threshold criteria, no additional substantial adverse impacts beyond those discussed above are anticipated. Because the Project meets the criteria for categorically exempt infill development projects, and because it would not have a significant effect on the environment, this analysis finds that a Notice of Exemption may be prepared for the Project. No further review is needed.

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