



MEMORANDUM

Date	April 28, 2025
To	Amelia Kolokihakaufisi, Associate Planner, City of Burlingame
From	Kishann Rai, Assistant Project Manager Maria Kisyova, Project Manager Akoni Danielsen, Principal Project Manager
Subject	1385 Hillside Circle – CEQA Categorical Exemption Qualification

I. Introduction to Categorical Exemptions

The California Environmental Quality Act (CEQA) Guidelines contain classes of projects that have been determined not to have a significant effect on the environment and are, therefore, exempt from the provisions of CEQA. CEQA Guidelines Sections 15301 – 15333 constitute the list of categorically exempt projects and contain specific criteria that must be met in order for a project to be found exempt. CEQA Guidelines Section 15303, New Construction or Conversion of Small Structures, sets forth conditions for projects characterized as new construction or conversion of small structures that may be found categorically exempt. Additionally, CEQA Guidelines Section 15300.2 includes a list of exceptions to exemptions, none of which may apply to a project in order for it to qualify for a categorical exemption (i.e., if an exception applies, a project is precluded from being found categorically exempt).

The City of Burlingame, serving as the Lead Agency, is completing environmental review for the 1385 Hillside Circle Subdivision project (“project”) in compliance with CEQA, the CEQA Guidelines (California Code of Regulations Section 15000 et. seq.), and the regulations and policies of the City of Burlingame. This Memorandum describes the proposed project and provides analysis and evidence to support a determination by the City of Burlingame that the project would be eligible for a Categorical Exemption under CEQA.

II. Existing Conditions

The approximately 0.86-acre project site is located at 1385 Hillside Circle (Assessor’s Parcel Number [APN] 027-282-050) in the City of Burlingame. The site is bounded by Hillside Circle to the north and Easton Drive to the south, with a steep slope toward Easton Drive. The site is surrounded by other

single-family residences. The project site is designated as Low Density Residential in the City's General Plan and is within the R-1 zoning district.

Existing development on-site consists of an approximately 11,300 square foot, two-story plus basement, primary residence. The site has two accessory structures; an approximately 1,856 square foot detached garage in the northeastern corner of the site and an approximately 661 square foot detached garage in the southwestern corner of the site. Figure 1 and Figure 2 show regional and vicinity maps of the site, respectively. An aerial photograph of the site is shown on Figure 3.

The remainder of the site is landscaped. The site contains four trees, consisting of three native, protected oak trees and one invasive acacia tree. The acacia tree is non-protected, and is proposed to be removed. There is an African fern pine tree off-site to the east.

III. Project Description

The project proposes to demolish all existing improvements on-site. The project would then subdivide the parcel into three individual lots. The project would construct three, two-story, single-family residences, with one residence on each lot. Each residence would be approximately 4,000 square feet in size and include an attached two-car garage. The project would construct a new driveway for each of the three proposed lots from Hillside Circle. The driveways and garages would provide parking spaces for vehicles associated with the new residences. New utility connections would be made to existing lines as needed for each development. The proposed development on each lot is described below.

Lot 1

Lot 1 would be approximately 10,545 square feet and would be located on the far east of the project site. The project proposes to build a two-story residence on lot 1 that has a total floor area of 3,797 square feet. The proposed residence would have four bedrooms, four bathrooms, and one powder room. The residence would have one balcony on the main floor and three balconies on the lower floor. The attached garage would be approximately 458 square feet. As discussed earlier, the new residence would be accessed via its own private driveway off of Hillside Circle. The lot would be landscaped with five trees.

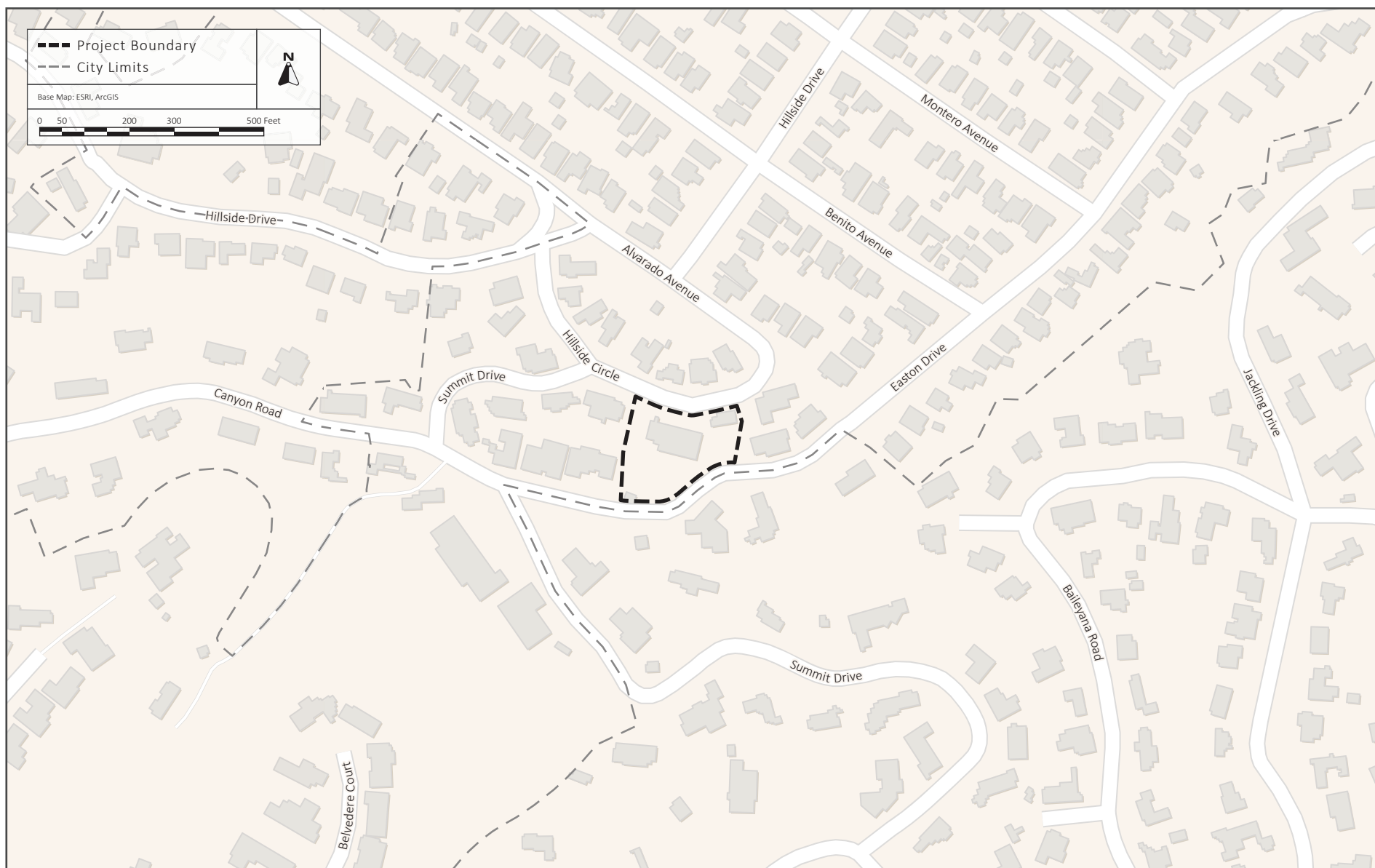
Lot 2

Lot 2 would be approximately 13,184 square feet in size and would be located between lot 1 and lot 3. The project proposes to build a two-story residence with four bedrooms and four bathrooms with a total floor area of approximately 3,522 square feet. The residence would include one balcony on the main floor and two decks on the lower floor. The attached garage would be approximately 437 square feet. The new residence would be accessed via a private driveway off of Hillside Circle.



REGIONAL MAP

FIGURE 1



VICINITY MAP

FIGURE 2



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

FIGURE 3

Lot 3

Lot 3 would be 13,266 square feet and would be located on the westernmost portion of the site. It would be accessible via its own private driveway via Hillside Circle. A new two-story residence with a floor area of approximately 3,510 square feet would be constructed. The proposed residence would have four bedrooms, four bathrooms, and one powder room. The residence would include one balcony on the main floor and one balcony on the lower floor. The attached garage would be 441 square feet. Seven trees would be planted on the lot as part of landscaping improvements.

A site plan is shown on Figure 4 and project rendering is shown on Figure 5.

Project Construction

Project construction activities would include demolition, site preparation, grading and excavation, trenching and foundation, building the exterior and interior, paving, and utility installation. Equipment used during construction would include concrete/industrial saws, rubber-tired dozers, tractors/loaders/backhoes, graders, cranes, forklifts, cement and mortar mixers, pavers, and rollers. The project would require excavation at a maximum depth of eight feet below the ground surface for utility connections. It is estimated that project construction would take a total of approximately 19 months. Construction of the project is anticipated to start in May 2026 and to be completed in December 2027.





Source: CHU Design Associates Inc.

SITE RENDERING

FIGURE 5

IV. Environmental Review

The purposes of this section are as follows:

- To document whether any of the exceptions to the use of a categorical exemption that are listed in CEQA Guidelines Section 15300.2 apply to the project.
- To assess the project's eligibility for a Class 3 Categorical Exemption from CEQA under Section 15303, New Construction or Conversion of Small Structures.

Section 15300.2 – Exceptions

Per Section 15300.2 of the CEQA Guidelines, there are six categories of exceptions to the use of categorical exemptions:

- Location
- Cumulative Impact
- Significant Effect
- Scenic Highways
- Hazardous Waste Sites
- Historical resources

The applicability of each of these six categories to the proposed project is discussed below.

(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 all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The project site is located in an urban, residential area. The project site is currently developed with a single-family residence and accessory structures. As a residential project, it would use and store supplies such as oil, paint, cleaning supplies, and pesticides, and would not involve the long-term use or storage of hazardous materials. Further, there are no known special-status species or critical habitat areas on-site or in the project vicinity that could be impacted by the project.^{1,2} Due to the developed nature of the site and surrounding area, lack of sensitive habitats, and human

¹ U.S. Fish & Wildlife Service. "Critical Habitat for Threatened & Endangered Species [USFWS]". Accessed February 18, 2025. <https://fws.maps.arcgis.com/home/webmap/viewer.html?useExisting=1>.

² National Oceanic and Atmospheric Administration. "National NMFS ESA Critical Habitat Mapper". Accessed February 18, 2025. <https://noaa.maps.arcgis.com/apps/webappviewer/index.html?id=68d8df16b39c48fe9f60640692d0e318>.

disturbance, special-status plant and animal species are not expected to occur on the site. The project would not be constructed in a biologically sensitive area. Therefore, the project would not result in an impact to any particularly sensitive environments.

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

The project site is located in an urbanized, residential area within the City of Burlingame. The proposed project would demolish the existing structures on site, create three new lots, and construct a single-family house on each lot. Development would be limited to the project site and there are no similar projects proposed in the vicinity that would result in significant impacts. Therefore, the cumulative impact of successive projects of the same type in the same place would not be significant.

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

The unusual circumstances exception precludes the use of a Categorical Exemption if a two-prong test is satisfied. First, the Lead Agency must evaluate whether there is an “unusual circumstance” that differentiates the project from the general class of similarly situated projects. Second, the Lead Agency must consider whether the unusual circumstance that pertains to the project creates a “reasonable possibility” that the project may result in a “significant environmental impact.”

As discussed in the analysis below, the project does not contain any unusual circumstances, nor would it result in any significant environmental impacts.

General Plan and Zoning

The project site is designated as Low Density Residential in the City’s General Plan and is within the R-1 zoning district. The proposed project would be consistent with the General Plan designation and zoning district and would, therefore, not result in a significant effect due to unusual circumstances.

Geology and Soils

Site-specific geotechnical investigations were prepared for each lot by GeoFoundation, Inc. in August 2024. The reports are attached as Appendices A through C.

The entire San Francisco Bay Area is subject to seismic related geologic activity. The southern portion of the site lies within a liquefaction zone and the middle portion of the site is within a landslide zone.³ However, liquefaction is unlikely to occur and the hazard for seismically-induced

³ California Geological Survey. “Earthquake Zones of Required Investigation”. Accessed February 18, 2025.

landslides is relatively low.^{4,5,6} The project would conform to the standard engineering and building practices and techniques specified in the geotechnical reports and the California Building Code. The proposed project would, therefore, not result in a significant effect on the environment due to unusual circumstances.

Biological Resources

The proposed project would construct three residences on a developed lot surrounded by existing residences. The project would remove one tree and plant a total of 12 trees. The removal of trees for the construction of new residences is not unusual. Further, the project and project site do not contain any features (e.g., wetlands, riparian zones, etc.) that are unique or unusual for a residential development. The site is located more than one mile from the nearest significant biological resources including, but not limited to, San Andreas Lake, Lower Crystal Springs Reservoir, Pilarcitos Lake, and San Francisco Bay. As mentioned in the discussion under question a), there are no known special-status species or critical habitat areas on-site or in the project vicinity. Standard measures that are required by local, state, and federal law would be implemented as part of the project to minimize and avoid construction-related impacts. The proposed project would, therefore, not result in a significant effect on the environment due to unusual circumstances.

Construction Phase Air Quality Impacts

For determining whether emissions from the construction of the project would result in a significant impact, a Construction Emissions and Health Risk Assessment was prepared by Illingworth & Rodkin dated April 11, 2025. The report is attached as Appendix D. The following discussion is based on that report.

2017 Bay Area Air District Clean Air Plan

The most current air quality plan is the 2017 Clean Air Plan (CAP). The Bay Area Air District (Air District) CEQA Air Quality Guidelines set forth criteria for determining consistency with the CAP. In general, a project is considered consistent if a) the plan supports the primary goals of the CAP of protecting public health and the climate; b) includes relevant control measures; and c) does not interfere with implementation of CAP control measures.

The proposed project supports the goals of the CAP by:

- Complying with Air District best management practices (BMPs) to reduce criteria air pollutant emissions during construction;

<https://maps.conservation.ca.gov/cgs/EQZApp/App/>.

⁴ GeoFoundation, Inc. *Geotechnical Investigation For Proposed New Residence In Lot-1*. August 2024.

⁵ GeoFoundation, Inc. *Geotechnical Investigation For Proposed New Residence In Lot-2*. August 2024.

⁶ GeoFoundation, Inc. *Geotechnical Investigation For Proposed New Residence In Lot-3*. August 2024.

- Utilizing construction equipment that reduces particles that have a diameter of 10 micrometers or less (PM₁₀), particles that have a diameter of 2.5 micrometers or less (PM_{2.5}), and diesel particulate matter (DPM) emissions; and
- Complying with applicable regulations that would result in energy and water efficiency, including the California Green Building Standards Code (CALGreen) and the City's Green Building Ordinance.

As discussed below, the project would not exceed the Air District significance thresholds for criteria air pollutant emissions for construction and operation. For these reasons, the proposed project would be consistent with the applicable control measures and would not conflict with or obstruct the implementation of the CAP.

Construction Criteria Pollutant Emissions

Air District guidance requires a construction criteria pollutant analysis to be completed for all construction projects that require demolition and excavation and/or are above the Air District's construction screening size criteria. The project is below the Air District's construction screening threshold of 254 units for single-family housing; however, project construction activities would include demolition and excavation. Thus, the California Emissions Estimator model (CalEEMod), Version 2022, was used to estimate annual emissions from project construction. Refer to Appendix A for details about modeling and calculations.

The table below shows the estimated average daily construction emissions of reactive organic gases (ROG), nitrogen dioxide (NO_x), PM₁₀ exhaust, and PM_{2.5} exhaust during construction of the project.

Table 1: Project Construction Period Emissions

Year	ROG	NO_x	PM₁₀ Exhaust	PM_{2.5} Exhaust
Construction Emissions Per Year (tons)				
2026	0.04	0.43	0.02	0.02
2027	0.16	0.55	0.02	0.02
Average Daily Construction Emissions Per Year (pounds per day)				
2026 (175 construction workdays)	0.50	4.96	0.18	0.17
2027 (251 construction workdays)	1.30	4.35	0.16	0.14
<i>Air District Thresholds</i>	<i>54</i>	<i>54</i>	<i>82</i>	<i>54</i>
<i>Exceed Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Source: Illingworth & Rodkin, Inc. *1385 Hillside Circle Construction Emissions & Health Risk Assessment*. April 11, 2025.

As shown in Table 1, construction period emissions would not exceed the daily thresholds established by the Air District for ROG, NO_x, PM₁₀ exhaust, and PM_{2.5} exhaust. Additionally, General

Plan Policies HP-3.11 and HP-3.12 require implementation of Air District-recommended BMPs to control dust from project construction, which would further reduce emissions. The BMPs, which are listed below, would be implemented as a Condition of Approval.

Condition of Approval: During any construction period ground disturbance, the applicant shall ensure that the project contractor implement the following measures to control dust:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and 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.
- 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 is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a six- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
- Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.

As discussed above, the proposed project would not exceed Air District thresholds for construction criteria pollutants. Therefore, the project would not have a significant air quality effect on the environment due to unusual circumstances.

Health Risk Impacts

Project Construction Health Risk Impacts

The project would introduce new sources of toxic air contaminants (TACs) and diesel particulate matter (DPM) during project construction (i.e., through worker and vendor trips, on-site construction, and truck hauling emissions). Community risk impacts were evaluated by estimating cancer risk, the increase in annual PM_{2.5} concentration, and computing the Hazard Index (HI) for non-cancer health risks to nearby sensitive receptors and the nearby Hoover Elementary School.

Refer to Appendix A for details. The construction maximally exposed individual (MEI)⁷ was identified on the first floor of an adjacent single-family residence west of the project site. Table 2 below summarizes the construction risk impacts at the off-site MEI.

Table 2: Construction Risk Impacts at the Off-Site MEI

Source	Cancer Risk (per million)	Annual PM _{2.5} (µg/m ³) ¹	Hazard Index
MEI on First Floor of Adjacent Residence			
Project Construction Unconditioned	12.43 (infant)	0.05	0.01
Project Construction Conditioned ²	2.30 (infant)	0.03	<0.01
<i>Air District Single-Source Threshold</i>	<i>>10.0</i>	<i>>0.3</i>	<i>>1.0</i>
<i>Exceed Threshold? Unconditioned</i>	Yes	<i>No</i>	<i>No</i>
<i>Exceed Threshold? Conditioned²</i>	<i>No</i>	<i>No</i>	<i>No</i>
Maximum School Impact – Hoover Elementary School			
Project Construction Unconditioned	2.76 (child)	0.02	<0.01
<i>Air District Single-Source Threshold</i>	<i>>10.0</i>	<i>>0.3</i>	<i>>1.0</i>
<i>Exceed Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>
Notes:			
¹ µg/m ³ = micrograms per cubic meter			
² Implementation of Air District BMPs and use of equipment with Tier 4 Interim engines during construction.			
Source: Illingworth & Rodkin, Inc. <i>1385 Hillside Circle Construction Emissions & Health Risk Assessment</i> . April 11, 2025.			

As shown in Table 2, the annual PM_{2.5} concentration and HI from construction activities would be below the Air District's single-source significance threshold. The maximum cancer risks from construction activities at the construction MEI would exceed the single-source significance threshold. However, with implementation of the Condition of Approval to control dust, listed previously, cancer risk would be reduced to below the Air District threshold. Further, implementation of the Condition of Approval below would reduce DPM emissions and reduce the project's construction cancer risk by 30 percent.

Condition of Approval: The project applicant shall implement a feasible plan to reduce DPM emissions by 30 percent such that increased cancer risk from construction would be reduced below TAC significance levels as follows:

1. All construction equipment larger than 25 horsepower used at the site for more than two

⁷ The project MEI is identified as the sensitive receptor(s) that is most impacted by the project's health risk impacts from construction activities.

continuous days or 20 hours total shall meet U.S. EPA Tier 4 Interim emission standards for PM (PM₁₀ and PM_{2.5}), if feasible.

2. Alternatively, the applicant may develop another construction operations plan demonstrating that the construction equipment used on-site would achieve a reduction in construction DPM emissions by 30 percent or greater. Elements of the plan could include a combination of some of the following measures:
 - o Installation of electric power lines during early construction phases to avoid use of diesel portable equipment,
 - o Use of electrically-powered equipment,
 - o Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered,
 - o Change in construction build-out plans to lengthen phases, and
 - o Implementation of different building techniques that result in less diesel equipment usage.

Such a construction operations plan would be subject to review by an air quality expert and approved by the City prior to construction.

Therefore, the proposed project would not exceed Air District thresholds for health risk impacts, and the project would not have a significant air quality related health effect on the environment due to unusual circumstances.

Cumulative Health Risk Impacts

A 1,000-foot buffer is the typical buffer distance for cumulative air quality impacts based on Air District guidance. A review of the project area indicated that nearby roadways within the 1,000-foot influence area could have cumulative health risk impacts at the MEI. Table 3 below shows the project and cumulative health risk impacts.

Table 3: Impacts from Combined Sources at Off-Site MEI

Source	Cancer Risk (per million)	Annual PM _{2.5} (µg/m3)	Hazard Index
Project Construction Unconditioned	12.43 (infant)	0.05	0.01
Project Construction Conditioned*	2.30 (infant)	0.03	<0.01
Air District Single-Source Threshold	>10.0	>0.3	>1.0
Exceed Threshold? Unconditioned	Yes	No	No
Exceed Threshold? Conditioned*	No	No	No
Cumulative Impacts			
Cumulative Roadways	2.30	0.11	0.01
Cumulative Total Unconditioned	14.73	0.16	0.02

Source	Cancer Risk (per million)	Annual PM _{2.5} (µg/m ³)	Hazard Index
Cumulative Total Conditioned	4.60	0.14	<0.02
Air District Cumulative Source Threshold	>100	>0.8	>10.0
Exceed Threshold? Unconditioned	No	No	No
Exceed Threshold? Conditioned	No	No	No

* Implementation of Air District BMPs and use of equipment with Tier 4 Interim engines during construction.
Source: Illingworth & Rodkin. *1385 Hillside Circle Construction Emissions & Health Risk Assessment*. April 11, 2025.

As shown in Table 3, the annual PM_{2.5} concentration and HI would not exceed the single-source or cumulative-source thresholds. The project's cumulative health risk for cancer would exceed the Air District's threshold. Implementation of the Conditions of Approval listed previously would reduce the annual PM_{2.5} concentration from construction to below Air District thresholds. Therefore, the proposed project would not exceed Air District thresholds for cumulative health risk impacts, and the project would not have a significant cumulative air quality effect on the environment due to unusual circumstances.

Operational Phase Air Quality Impacts

The three-unit project is below the Air District's operational screening threshold for single-family housing, which is 421 units.⁸ Therefore, an operational analysis is not required, and the project would not result in a significant effect due to unusual circumstances.

Construction Phase Noise Impacts

For determining whether noise from the construction of the project would result in a significant impact, a Construction Noise & Vibration Assessment was prepared by Illingworth & Rodkin dated April 11, 2025. The report is attached as Appendix E. The following discussion is based on that report.

The existing noise environment at the project site primarily results from vehicular traffic along local roadways and periodic aircraft overflights associated with the San Francisco International Airport (SFO). The project site is generally surrounded by single-family residences.

Section 18.07.110 of the City's Municipal Code limits construction hours to between 7:00 a.m. and 7:00 p.m. on weekdays, to between 9:00 a.m. and 6:00 p.m. on Saturdays, and to between 10:00

⁸ Bay Area Air District. "Screening For Criteria Air Pollutants And Precursors." https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-4-screening_final-pdf.pdf?rev=ac551d35a52d479dad475e7d4c57afa6&sc_lang=en. Accessed April 15, 2025.

a.m. to 6:00 p.m. on Sundays and holidays. However, the City of Burlingame does not establish noise level thresholds for construction activities. Therefore, the noise analysis uses the noise limits established by the Federal Transit Administration (FTA) for construction noise, which limit daytime construction noise to 80 dBA L_{eq} at residential land uses.

Construction of the proposed project would take approximately 19 months and would include demolition, site preparation, grading/excavation, trenching/foundation, building exterior and interior, and paving. Table 4 summarizes project construction activities at nearby receptors.

Table 4: Construction Noise Levels at Nearby Receptors

Phase of Construction	Calculated Hourly Average L_{eq} (dBA) at Nearest Residences From Operation of Two Loudest Pieces of Construction Equipment at Acoustic Center of Construction Activities				
	Noise Level at 50 feet	North 85 feet	West 95 feet	East 100 feet	South 120 feet
Demolition	85	80	79	79	77
Site Preparation	84	79	78	78	76
Grading/Excavation	84	79	78	78	76
Trenching/Foundation	82	77	76	76	74
Building - Exterior	81	76	75	75	73
Building - Interior/ Architectural Coating	74	69	68	68	66
Paving	81	77	76	75	74

Source: Illingworth & Rodkin. *1385 Hillside Circle Construction Noise & Vibration Assessment*. April 11, 2025.

As shown in Table 4, project construction activities measured from the center of the project site would not generate noise levels exceeding 80 dBA L_{eq} at closest existing noise-sensitive residential land uses to the south, east and west. However, noise levels at the nearest residential land use to the north would be above 80 dBA L_{eq} .

Condition of Approval: The project shall implement the following measures to reduce construction noise at nearby residences.

- Maximize the physical separation between noise generators and noise receptors. Such separation includes, but is not limited to, the following measures:
 - Use heavy-duty mufflers for stationary equipment and barriers around particularly noisy areas of the site or around the entire site;
 - Use shields, impervious fences, or other physical sound barriers to inhibit transmission of noise to sensitive receptors;

- Locate stationary equipment to minimize noise impacts on the community; and
 - Minimize backing movements of equipment.
- Use quiet construction equipment whenever possible.
- Impact equipment (e.g., jack hammers and pavement breakers) shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically-powered tools. Compressed air exhaust silencers shall be used on other equipment.
- Other quieter procedures, such as drilling rather than using impact equipment, shall be used whenever feasible.
- Prohibit unnecessary idling of internal combustion engines.
- In compliance with Chapter 18.07.110 of the Municipal Code, construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to the hours between 7:00 a.m. and 7:00 p.m., Monday through Friday, Saturdays between 9:00 a.m. and 6:00 p.m., and Sundays and Holidays between 10:00 a.m. and 6:00 p.m., unless permission is granted with a development permit or other planning approval.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Avoid the use of circular saws, miter/chop saws, and radial arm saws near the adjoining noise-sensitive receptors. Where feasible, shield saws with a solid screen with material having a minimum surface density of two pounds per square foot (e.g., such as ¾" plywood).
- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.
- During interior construction, locate noise-generating equipment within the building to break the line-of-sight to the adjoining receptors.
- The project sponsor shall designate a "disturbance coordinator" for construction activities. The coordinator would be responsible for responding to any local complaints regarding construction noise and vibration. The coordinator would determine the cause of the noise or vibration complaint and would implement reasonable measures to correct the problem.
- The construction contractor shall send advance notice to neighborhood residents within 50 feet of the project site regarding the construction schedule and including the telephone number for the disturbance coordinator at the construction site.

Construction of the project would take 19 months to complete. With implementation of the Condition of Approval above, the temporary construction noise impact would be reduced by reducing construction noise levels emanating for the site, limiting construction hours, and minimizing disruption and annoyance. Therefore, the project would not have a significant effect on the environment due to unusual circumstances.

Construction Phase Vibration Impacts

The construction of the project may generate perceptible vibration when heavy equipment or impacts tools are used. Project construction activities, such as drilling, the use of jackhammers, rock drills and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.), may generate substantial vibration in the immediate vicinity.

The City of Burlingame does not specify a construction vibration limit that should be used to regulate vibration produced by construction equipment. The analysis by Illingworth & Rodkin uses the vibration limits established by the California Department of Transportation (Caltrans) to identify the potential for substantial vibration levels. Caltrans establishes vibration limits of 0.5 inches per second of peak particle velocity (in/sec PPV) at new residential and modern/commercial structures, 0.3 in/sec PPV at older residential structures, and a conservative limit of 0.25 in/sec PPV at historic buildings. For the project, the 0.3 in/sec PPV vibration limit would be applicable at nearby residential buildings. Table 5 below summarizes the vibration levels calculated at various distances representing nearby buildings.

Table 5: Construction Equipment Vibration Levels

Equipment	PPV at 25 ft (in/sec)	West (10 ft) PPV	East (25 ft) PPV	South (50 ft) PPV	North (55 ft) PPV
Clam shovel drop	0.202	0.354	0.202	0.094	0.085
Hydromill (slurry wall) in soil	0.008	0.014	0.008	0.004	0.003
Hydromill (slurry wall) in rock	0.017	0.030	0.017	0.008	0.007
Vibratory Roller	0.210	0.368	0.210	0.098	0.088
Hoe Ram	0.089	0.156	0.089	0.042	0.037
Large bulldozer	0.089	0.156	0.089	0.042	0.037
Caisson drilling	0.089	0.156	0.089	0.042	0.037
Loaded trucks	0.076	0.133	0.076	0.035	0.032
Jackhammer	0.035	0.061	0.035	0.016	0.015
Small bulldozer	0.003	0.005	0.003	0.001	0.001
Small Vibratory Roller	0.087	0.153	0.087	0.041	0.037

Notes:

Bold text denotes an exceedance of the 0.3 in/sec PPV threshold.

Source: Illingworth & Rodkin. *1385 Hillside Circle Construction Noise & Vibration Assessment*. April 11, 2025.

As shown in Table 5, construction would not exceed 0.25 PPV at a distance of 25 feet from the project site. However, the use of a vibratory roller, or the dropping of a clam shovel, could result in vibration levels exceeding the 0.3 in/sec PPV limits recommended by Caltrans. The project would implement the following measures as a Condition of Approval to reduce vibration levels to below 0.3 in/sec PPV.

Condition of Approval: The project applicant shall ensure the contractor implements the following measures during all phases of demolition and construction to reduce vibration levels to less than 0.3 in/sec PPV at adjacent buildings.

- Place operating equipment on the construction site as far as possible from vibration-sensitive receptors.
- Use smaller vibratory rolling equipment, for example the Caterpillar model CP433E vibratory compactor, within 20 feet of the adjacent buildings to reduce vibration levels to 0.3 in/sec PPV or less.
- Select demolition methods not involving impact tools.
- Avoid dropping heavy equipment, such as a clam shovel drop, within 20 feet of the adjacent residential building west of the site.
- Designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person shall be clearly posted on the construction site.

Implementation of the Condition of Approval above would minimize vibration impacts. Therefore, the project would not have a significant construction vibration effect on the environment due to unusual circumstances.

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

There are no officially designated state scenic highways in the project area. The nearest officially designated state highway is Interstate 280, which is located approximately one mile west of the project site and is not visible from the project site.⁹ The project, therefore, would not damage scenic resources within a highway officially designated as a state scenic highway. As a result, the scenic highways exception to the exemption does not apply under 15300.2(d).

⁹ California Department of Transportation. "California State Scenic Highway System Map". Accessed February 18, 2025. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.

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

The project site is not included on any lists compiled pursuant to Section 65962.5 of the Government Code; therefore, no exception to the exemption applies under 15300.2.¹⁰

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

This discussion is based, in part, on a California Department of Parks and Recreation (DPR) 523 form prepared for the project by Page & Turnbull in October 2018. The form is attached as Appendix F.

The main residence on-site was constructed circa 1916. However, it was not found to be significant for any events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States or any significant persons. The architect of the property is not known. At one point, the residence maintained characteristics of the Craftsman style but has been significantly altered over time. Additionally, much of the landscape and its associated features have been lost to development leading to a loss of integrity. Therefore, the residence is ineligible for listing on the *California Register of Historical Resources (CRHR)* or the *National Register of Historic Places (NRHP)*.¹¹ Based on this analysis, it is concluded that the proposed project would not result in the demolition of any recognized historic structures.

No structures on-site are listed on the CRHR or the NRHR.^{12,13} The City has four officially designated resources: Burlingame Train Station, the Kohl Mansion, Howard-Ralston Eucalyptus Tree Rows, and Severn Lodge Dairy Wallscape. The nearest historic landmark is the Kohl Mansion located at 2750 Adeline Drive, which is approximately 0.4 miles north of the project site.

The City's General Plan area contains ten recorded Native American sites; 31 historic period buildings, structures, or objects; and one other historic period resource. Since the proposed project would be built on a previously developed site, the likelihood of discovering an archeological resource is low. The following standard measures would be implemented as part of the project to avoid impacts to unknown subsurface resources.

¹⁰ California Environmental Protection Agency. "Cortese List Data Resources". Accessed February 19, 2025. <https://calepa.ca.gov/sitecleanup/corteselist/>.

¹¹ Page & Turnbull Inc. *1385 Hillside Circle DPR 523L Forms*. October 18, 2018.

¹² California State Parks. "California Historical Resources". Accessed February 18, 2025. <https://ohp.parks.ca.gov/ListedResources/?view=name&criteria=burlingame>.

¹³ National Park Service. "National Register Database and Research." Accessed February 18, 2025. <https://www.nps.gov/subjects/nationalregister/database-research.htm>.

Conditions of Approval:

- If suspected prehistoric or historic resources are encountered during excavation and/or grading of the site, construction personnel shall be instructed to immediately suspend all activity within a 50-foot radius and the City shall be notified. A licensed archaeologist shall be retained in order to 1) evaluate the find(s) to determine if they meet the definition of a historical or archaeological resource; and 2) submit a resource mitigation and monitoring reporting program with appropriate recommendations regarding the disposition of such finds prior to resumption of construction activities. A report of findings documenting any data recovery shall be submitted to the Northwest Information Center (if applicable). Project personnel shall not collect or move any cultural materials. The City shall implement the recommendations of the qualified archaeologist.
- In the event that human remains are discovered during excavation and/or grading of the site, all activity within a 50-foot radius of the find shall be stopped. The City and the San Mateo County Coroner's office shall be notified. If the remains are determined to be Native American, the Coroner will notify the Native American Heritage Commission (NAHC) immediately. Once the NAHC identifies the most likely descendants, the descendants will make recommendations regarding proper burial, which will be implemented in accordance with Section 15064.5(e) of the CEQA Guidelines.

Conclusion

Based on the analysis above, none of the exceptions to categorical exemptions detailed in CEQA Guidelines Section 15300.2 apply to the proposed project.

Section 15303 – New Construction or Conversion of Small Structures

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel. Examples of this exemption include, but are not limited to:

- (a) One single-family residence, or a second dwelling unit in a residential zone. In urbanized areas, up to three single-family residences may be constructed or converted under this exemption.
- (b) A duplex or similar multi-family residential structure, totaling no more than four dwelling units. In urbanized areas, this exemption applies to apartments, duplexes and similar structures designed for not more than six dwelling units.

- (c) A store, motel, office, restaurant or similar structure not involving the use of significant amounts of hazardous substances, and not exceeding 2500 square feet in floor area. In urbanized areas, the exemption also applies to up to four such commercial buildings not exceeding 10,000 square feet in floor area on sites zoned for such use if not involving the use of significant amounts of hazardous substances where all necessary public services and facilities are available and the surrounding area is not environmentally sensitive.
- (d) Water main, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length to serve such construction.
- (e) Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences.
- (f) An accessory steam sterilization unit for the treatment of medical waste at a facility occupied by a medical waste generator, provided that the unit is installed and operated in accordance with the Medical Waste Management Act (Section 117600, et seq., of the Health and Safety Code) and accepts no offsite waste.
- (g) The site can be adequately serviced by all required utilities and public services.

The Class 3 exemption allows for three single-family residences to be constructed in an urbanized area. The project proposes demolishing the existing improvements on-site to construct three single-family residences in an urbanized residential area. The project would be consistent with the General Plan designation and zoning district. Therefore, the proposed project qualifies for a Categorical Exemption under Class 3.

V. Conclusion

As documented in Section IV. Environmental Review, with the incorporation of the City's standard conditions of approval, none of the exceptions contained in CEQA Guidelines Section 15300.2 apply to the project and the project is consistent with the criteria in CEQA Guidelines Section 15303. The project, therefore, qualifies as exempt from the provisions of CEQA under Class 3 of the CEQA Guidelines.