



CITY OF BURLINGAME PLANNING COMMISSION STAFF REPORT

Agenda Item: 7a	Hearing Date: August 10, 2026
Project No.	DSRA23-0005
Location	1501 Trousdale Drive APNs: 025-123-191 and 025-123-192
Applicant and Architect	Matthew Brausch- Ameresco and Vahram Massehian – Sutter Health
Property Owners	Mills-Peninsula Health Service
Staff	Catherine Keylon, Senior Planner
General Plan Designation	Public/Institutional
Zoning	P/I (Public/Institutional)
Lot Area	20.8 acres

PROJECT DESCRIPTION

Review of an application for a Conditional Use Permit Amendment for the construction of solar carports with an energy storage system and amendment to conditions of approval for helipad usage at the Sutter Health Mills-Peninsula Medical Center located on a 20.8 acre site in the P/I (Public/Institutional) Zoning District.

RECOMMENDATION

Staff recommends the Planning Commission, by resolution, approve the Conditional Use Permit Amendment, as conditioned.

BACKGROUND

On November 15, 2004, the City of Burlingame certified the Final Environmental Impact Report (FEIR; State Clearinghouse #2003072005) and approved a Conditional Use Permit (CUP) for the Peninsula Hospital Replacement Project (City Council Resolution No. 105-2004); the "Approved Project". The Approved Project consisted of the demolition of the existing 450,760 square foot hospital building; construction of a new 435,186 square foot six- to seven-story main hospital building, a 146,323 square foot, four- to five-story medical office building, a freestanding, four-level parking garage, and surface parking; and relocation of the existing helipad. The resulting Mills-Peninsula Medical Center (MPMC), also previously known as "Peninsula Hospital", is located at the southwest corner of El Camino Real and Trousdale Drive in the northern portion of Burlingame.

On June 23, 2008, the Planning Commission approved an amendment to the Approved Project's CUP to allow the addition of another floor on top of the medical building and a modification to the helipad design placement on a raised platform rather than a dirt mound. A second amendment to the Approved Project CUP was approved on August 23, 2010 for design changes related to exhaust flues, fire lane/path, and rooftop screening. On September 21, 2015, the City Council adopted a resolution confirming the City's approval of the construction of the helipad in accordance with the Approved Project's Caltrans permit requirements and California Public Utilities Code Section 21661.5.

ANALYSIS

The applicant has submitted an application to amend the Approved Project's CUP to accommodate the proposed project, which consists of two parts:

- 1) Solar Energy System - the installation of solar photovoltaic (PV) carports and energy storage units housing lithium-ion batteries to be installed in the existing surface parking lot, and removal of 121 trees to accommodate these items; and
- 2) Helipad Usage - amendments to the existing conditions of approval related to the helipad usage.

Collectively, these components comprise the “Project” for Planning Commission consideration.

Solar Energy System

The applicant proposes the construction of eight (8) solar carports supporting a total of 1,950 solar modules, as well as the installation of energy storage units housing lithium-ion batteries in the surface parking lot on the west side of the property, behind the hospital tower.

As proposed, the solar energy system installation would result in the loss of 121 existing trees and eight (8) parking spaces near the southeast corner of Solar Array G to accommodate electrical pads associated with the Project. A total of 1,551 parking spaces will remain where a minimum of 1,540 parking spaces are required per BMC Section 25.40.030. The battery storage units and infrastructure have been placed strategically to be close to the electrical service for the site and will not impact emergency vehicle access and other facility operations. All solar carports will have a minimum vertical clearance of 13'-6" to comply with fire apparatus access requirements.

The 1,950 PV modules will be installed on eight (8) steel carport structures to form arrays consisting of 156 to 396 modules. Each module is approximately 6.5 feet by 3.5 feet and is attached in a fixed orientation to the underlying support structure. The overhead carport structures that carry the solar modules will be stationary at a 7-degree tilt. The steel column for the carport will be embedded in concrete piers within the landscape islands. As the carport structures are proposed in the landscaped areas of the parking lot, 121 trees are proposed to be removed.

The carport structures will be constructed from steel beams and columns that will be primed and painted with marine grade paint to match the architectural aesthetic of the campus, which is depicted in the renderings on sheet MP-A1.1 of the attached project plans. The solar carports will be positioned in the interior rows of the parking lot to preserve the trees and landscaping along the perimeter and main drive aisles. In addition, the existing 30-foot-tall parking lot light fixtures will be replaced with 12-foot light fixtures under the new solar carports. The energy storage units and supporting electrical equipment will be screened and secured, as shown on the renderings on sheet MP-A1.1 of the attached project plans.

The Project will result in minimal noise generated by small cooling fans that are comparable to the sound of a residential air conditioning unit. The solar arrays use inverters to convert the DC electricity produced by the modules into AC electricity which can be sent to the building or utility grid. These inverters convert the electricity and monitor output. The solar arrays will have two to four inverters dispersed throughout each and they will be mounted to the columns. The cooling fans are contained within the inverters and typically run during the daytime when the inverters are in operation.

The construction of the solar carports and energy storage system will take approximately 21 weeks (5 months). The application materials note that the proposed system will offset approximately 20% of the hospital's electricity usage by generating about 3,750 MWh of energy annually. The proposed solar project could mitigate 2,650 metric tons of carbon dioxide (CO₂) emissions each year. The applicant notes that this reduction in CO₂ emissions is equivalent to removing 573 vehicles from the roads or offsetting emissions of 3 million pounds of coal from being burned each year based on Environmental Protection

Agency (EPA) calculations. In addition, the on-site energy storage from the Project provides savings to the hospital by storing solar generated renewal energy during daytime and utilizing this energy in the evenings to reduce demand on the energy grid.

The proposed solar carports meet the applicable development standards of the Public/Institutional zoning district, as shown in Table 1 below.

Table 1: Project Information – Solar Arrays and Associated Equipment

	Proposed	Allowed/Required
Setbacks Front:	529'-10"	20'-0"
Side: (Left) (Right)	66'-7" 78'-3"	20'-0"
Rear:	80'-6"	20'-0"
FAR:	N/A*	3.0
Parking:	1,559** existing spaces - 8 surface spaces = 1,551 spaces (+11 spaces)	1,540 spaces

* The solar carports do not count in FAR under Code Section 25.30.060(B) which excludes parking garages and parking structures from commercial, industrial multi-unit and mixed-use buildings, either above ground or underground

** Total parking – 737 surface spaces + 822 spaces in parking structure = 1,559 total spaces at MPMC

Urban Reforestation and Tree Protection Ordinance

An Arborist Report was prepared by BrightView Tree Care Services, dated April 26, 2022, to evaluate the proposed removal of the 121 trees. According to the applicant, the existing trees would pose a safety risk for the Project due to the proximity of the electrical equipment to overhanging tree limbs, debris such as falling leaves and branches, and invasive roots creating hazards to the operation of the solar equipment. Seventy-two (72) of the parking lot trees to be removed are Chinese elms. A list of the type, quantity and health status of the trees proposed for removal is provided in Table 2 below. The arborist report indicates that these trees are in various stages of decline, and are planted in very compact soil with confined growing space. Approximately 450 trees will remain on the Project site.

Table 2: Trees Proposed for Removal

Species Common Name (Scientific Name)	Quantity	Health
American Hornbeam (<i>Carpinus Caroliniana</i>)	33	Good
	12	Poor
Red Maple (<i>Acer Rubrum</i>)	3	Poor
Allee Chinese Elm (<i>Ulmus Parvifolia Cv</i>)	1	Fair
	72	Poor
Coast Redwood (<i>Sequoia Sempervirens</i>)	0	Good

Total	121	
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All the trees proposed for removal are not protected by the City's Urban Reforestation and Tree Protection Ordinance (BMC Chapter 11.06). The Project application was submitted and deemed complete prior to January 2025, the effective date of the updated Ordinance. At the time the Project application was deemed complete, a protected size tree was defined as having a 48-inch circumference (15-inches in diameter) when measured at 54-inches above grade. Accordingly, tree replacement was not required for the trees proposed for removal by the Project. Therefore, the Project does not include added landscaping or tree plantings.

Helipad Usage

In 2004, the Approved Project included a helipad located in the surface parking lot on the west side of the property, behind the hospital tower. The FEIR for the Approved Project evaluated up to six helicopter trips per year, and the Approved Project CUP limited the maximum number of helicopter trips to 24 per year. Actual frequency of use of the helipad is dependent on the number of emergencies and has ranged between 79 and 117 trips annually between 2022 and 2024.

The City has received complaints from residents near MPMC regarding both the number of helicopter trips and the flight paths used by the helicopters. However, the operations at the existing helipad are regulated by the California Department of Transportation ("Caltrans") under a heliport permit and the Federal Aviation Administration ("FAA"), which has exclusive sovereignty over airspace and can preempt any local controls. The City has no regulatory authority over the operations of helipads and cannot regulate the number of flights or their flight paths.

The Approved Project's Caltrans heliport permit does not regulate the number of helicopter trips per year. However, as noted above, use of the helipad is regulated by Caltrans and the FAA; the City does not have the authority to enforce the existing conditions of approval related to usage of the helipad. Given that the City does not have the authority to regulate operations of the helipad, including flight paths or frequency of flights, the applicant is requesting amendments to the CUP to remove the conditions of approval related to the helipad usage.

Staff is recommending removal of the unenforceable helipad-related conditions regulating operations, as requested by the applicant. A new Condition of Approval has been added requiring the helipad to operate in accordance with all FAA regulations and the conditions of the Heliport Permit issued by Caltrans (new Condition of Approval #4).

Conditional Use Permit Amendment

The intent of a Conditional Use Permit is to allow the Planning Commission or other City decision-making body to determine if the proposed use is compliant with the Municipal Code, General Plan, and surrounding uses in accordance with the required findings in BMC Section 25.66.060. For an amendment to an approved CUP, as is proposed for this Project, the Planning Commission is required to make the same findings that are required for the original approval (BMC Section 25.88.040.D.).

Subject to conditions of approval, the Project is consistent with the General Plan and land use designation of Public/Institutional as the property will remain unchanged with an institutional use. The Project is in support of the goals set forth in the City's Climate Action Plan by providing a renewable energy source that results in greenhouse gas emission reductions. The new system will generate 3,750 MWh of energy

annually, which will offset approximately 20% of the facility's electricity usage while providing additional shade for the parking areas.

While the Project involves the removal of 121 trees, the solar carports with energy storage system will not impact the intended use of the parking lots to accommodate the hospital staff, patients and visitors. The Project will not adversely affect the public convenience, health, interest, safety, or general welfare, constitute a nuisance, or be materially injurious to the improvements, persons, property, or uses in the vicinity and zoning district in which the property is located in that the solar carports will be stationary will generate minimal noise. The carports will have small cooling fans comparable to the sound of a residential air conditioning unit (60 decibels at distance of 1 meter). The solar carports have been designed with anti-reflective coating on the top of the modules to minimize the potential for glare. A glare analysis was conducted using the Forge Solar software, which is FAA-accepted, and the results indicated no harmful glare was detected on the adjacent properties. The results were also reviewed by the applicant's independent engineering consulting firm, Artelier Ten. All construction will be required to comply with applicable requirements of the California Building Code and International Fire Code.

Tree Removal Reduction and Replacement

The Planning Commission may wish to direct the applicant to consider project revisions that reduce the number of trees to be removed and to prepare a landscape plan that includes replacement trees. For instance, with minor changes to the placement of the solar carports, there could be a net decrease of 13 trees necessary to be removed. The applicant could investigate the feasibility of preserving as many trees as possible by relocating solar modules from the northwest end of Arrays A through E to the southeast end of Arrays G, H, and J. In addition, replacement trees could be added along the center median of the main entrance drive to the site and along the El Camino Real and Trousdale Drive frontages.

A draft condition regarding tree removal reduction and replacement has been included below for consideration, should the Planning Commission desire to provide such direction to the applicant:

That the applicant investigate the feasibility of preserving as many trees as possible by adjusting the design and location of the solar modules. In addition, the applicant shall identify locations on the project site for the installation of replacement trees, to the maximum extent feasible. The revised solar module design and location, and replacement tree locations shall be shown on the updated project plans to be reviewed and approved by the Planning Division prior to building permit issuance.

Conditions of Approval

The attached draft resolution includes conditions of approval for the Approved Project that remain applicable and conditions of approval for the current Project. This updated set of conditions of approval will supersede all previous conditions of approval. Condition of Approval # 1 has been added to identify that the previous conditions of approval have been superseded.

Environmental Review

On November 15, 2004, the City certified the FEIR and approved the CUP for the Approved Project. Since that certification, two addenda to the FEIR have been prepared for modifications to the Approved Project. The first addendum was prepared in June 2008 for a CUP amendment to allow the addition of a floor on top of the medical building and a modification to the helipad design. The second addendum was prepared in 2010, for minor design changes to the hospital and medical center. The Approved Project has been constructed and is in operation.

The City has prepared another addendum (the “Addendum”) to evaluate both components of the Project – the solar carport construction and the removal of the helipad-related conditions. The Addendum analyzes pertinent categories of potential CEQA impacts, including aesthetics, noise, air quality and biological resources.

The following technical studies were prepared for this analysis and to support the EIR Addendum conclusions:

- 1) Glare analysis, Forge Solar software (FAA-accepted), June 2022
- 2) Air quality analysis, Illingworth & Rodkin, Inc., October 30, 2025 updated June 9, 2026
- 3) Biological Assessment of helipad use on birds, H.T. Harvey & Associates, June 14, 2026
- 4) Noise Study, Helicopter Noise Analysis, SM&W, April 21, 2025

The Addendum is attached, with these studies provided for reference. The Addendum concludes that the Project would not cause new or more severe environmental impacts than those already identified in the FEIR, would not require revisions to the FEIR, and would not require any further environmental review under any of the criteria listed in CEQA Guidelines Section 15162. The Addendum analysis explains that the Project will not change the operations of the existing medical center that has been in operation since 2011 and will result in negligible ambient noise level increases. Each carport will have small cooling fans that are comparable to the sound of a residential air conditioning unit (60 decibels at distance of 1 meter). The solar carports have been designed with anti-reflective coating on the top of modules to minimize the potential for glare, and the Project would not result in additional employment or patient levels, nor additional vehicle trips to the site, therefore roadway noise would be unaffected.

The Addendum further notes that construction is estimated to take approximately 5 months and would have limited noise impacts. There are no air quality impacts associated with the operations of the Project and the contractor will comply with the City’s construction hours. Construction emissions would fall well below the Bay Area Air Quality Management District significance thresholds.

Finally, as to the helipad usage, the Applicant confirms that the hospital averages between 79 and 117 trips per year. Based on noise exposure modeling, operation of the helipad would expose surrounding sensitive uses to noise levels of less than 65 dBA CNEL, which is the FAA threshold for significant noise exposure. Operation would also be consistent with the City’s General Plan Policy CS-4.8 which considers land uses compatible with aircraft noise of 65 dBA CNEL or less. Further, annual average noise levels resulting from flights which deviate to the west from the north/south and southeast flight paths would not exceed 60 dBA CNEL at surrounding noise sensitive uses. The Addendum therefore concludes that noise impacts from the helipad usage remain less than significant, consistent with the findings of the 2004 FEIR.

Attachments:

Area Map
2004 Approved Project CUP Resolution
Arborist Report, BrightView, April 2022
Caltrans Heliport Permit
Glare analysis, Forge Solar, June 2022
Resolution
Proposed Plans dated June 19, 2025
EIR Addendum

- Appendix A - Air Quality
- Appendix B – Helicopter Noise Analysis
- Appendix C - Helicopter Noise Analysis Peer Review
- Appendix D – Assessment of Helipad Use Impacts on Birds

