Addendum for the
Mills Peninsula Hospital Replacement Project
[SCH] #2003072005

Prepared by

THE CITY OF BURLINGAME CALIFORNIA INCORPORATED 1908

In Consultation with

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All appendices are incorporated herein by reference.

Section 1.0 Purpose of Addendum

The California Environmental Quality Act (CEQA) recognizes that following the completion of an environmental document and the implementation of a project, that the project proponent may propose subsequent changes to the nature and operation of the project. Before proceeding with changes to a project, CEQA requires the Lead Agency to evaluate these changes to determine whether or not they affect the conclusions in the environmental document.

On November 15, 2004, the City of Burlingame (City) certified the Final Environmental Impact Report (FEIR) (State Clearinghouse [SCH] # 2003072005) and approved a Conditional Use Permit (CUP) for the Peninsula Hospital Replacement Project (City Council Resolution No. 105-2004). The approved project consisted of the demolition of the existing 450,760-square-foot hospital building; construction of a new 435,186-gross-square-foot six- to seven-story main hospital building, a 146,323-gross-square-foot, four- to five-story medical office building, a freestanding, four-level parking garage, and surface parking; and relocation of the existing helipad.

Since certification of the FEIR and approval of the CUP, the approved project was constructed and has since been in operation. In November 2023 the City received an application for a CUP amendment to allow for the construction of eight carport-style solar modules in the surface parking lot and removal of 121 trees to accommodate the modules.

The use of the existing helipad is regulated by the California Department of Transportation (CalTrans) under a heliport permit and the Federal Aviation Administration (FAA). The Caltrans heliport permit does not regulate the number of helicopter trips per year. The certified FEIR evaluated up to six helicopter trips per year to the facility. The existing CUP Conditions of Approval for the approved project allow for up to 24 trips per year (Condition of Approval #45). The actual usage of the helipad has been considerably higher than what the FEIR assumed (ranging between 79 and 101 trips annually between 2022 and 2024). 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 CUP condition of approval related to the annual usage of the helipad. Therefore, the applicant is also requesting removal of CUP Condition of Approval # 45. While the project only involves construction and installation of the solar panels and associated tree removals, this Addendum will also evaluate whether there are any new or more severe impacts associated with existing helipad operations than were previously evaluated in the FEIR.

The CEQA Guidelines Section 15162 states that when an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR or Negative Declaration shall be prepared for that project unless the Lead Agency determined, on the basis of substantial evidence in light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant

environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines Section 15164 states that the Lead Agency or a Responsible Agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in 15162 (see above) calling for preparation of a subsequent EIR or Negative Declaration have occurred.

Based on the proposed project modifications, knowledge of the project site and surrounding area, and the following discussion and analysis, the proposed modified project would not result in a new or substantially more severe significant impact than previously disclosed in the FEIR. Therefore, the standard for subsequent environmental review has not been met and an Addendum has been prepared consistent with CEQA Guidelines Section 15164.

This Addendum, which is to be considered together with the FEIR prepared for the project, will not be formally circulated for public review, but will be attached to the FEIR, pursuant to CEQA Guidelines Section 15164(c).

Section 2.0 Project Description

2.1 Project Location

The approximately 26-acre project site is located at the south corner of the Trousdale Drive and El Camino Real intersection in the City of Burlingame, about 0.3 mile south of the City of Millbrae border. Regional, vicinity, and aerial maps of the project site are shown on Figure 2.1, Figure , and Figure , respectively.

2.2 Summary of Approved Project Evaluated in FEIR

The approved project involved the replacement and expansion of the Mills-Peninsula Medical Center. The approved project consisted of the following components:

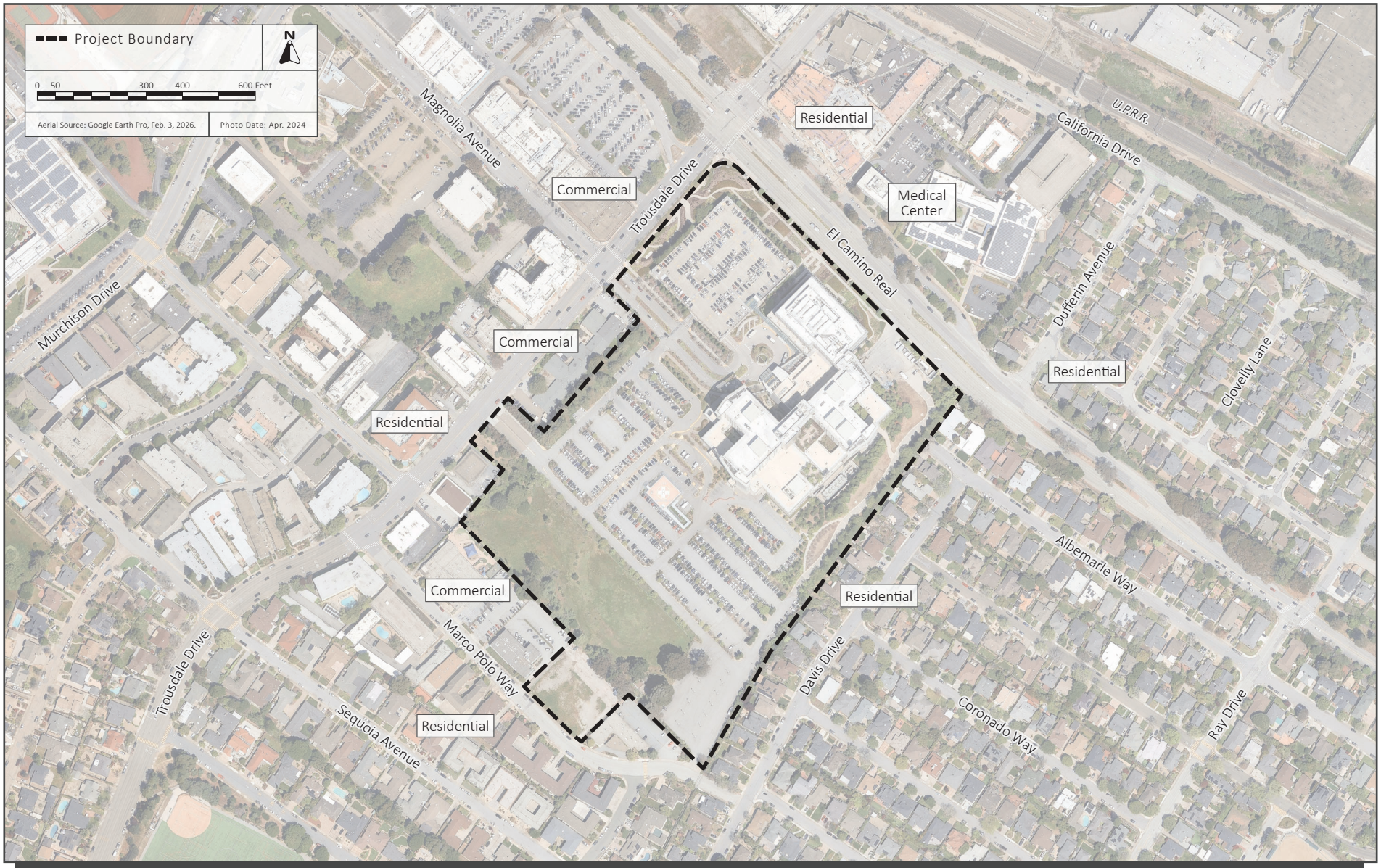
- Merging Parcels 5 (1811 Trousdale Drive) and 3 (1783 El Camino Real) under ownership of the Peninsula Health Care District (District) and Parcels 1 (1515 Trousdale Drive) and 2 (1791 El Camino Real) under ownership of Mills-Peninsula Health Services.
- Rezoning the merged parcels from C-3 (Professional Business Commercial) and Unclassified to C-1 (Retail Commercial)
- Demolition of an existing 450,760-square-foot hospital building and construction of a 435,186-gross-square-foot six- to seven-story main hospital building that would accommodate 313 beds and would have a maximum height of 141.1 feet above the existing grade at the site's El Camino Real border.
- Construction of a 146,323-gross-square-foot, four- to five-story medical office building (MOB) with a maximum height of 111.1 feet above the existing grade at the site's El Camino Real border.
- Construction of a freestanding, four-level garage with 809 parking spaces.
- Construction of four surface parking areas providing 653 parking spaces.
- Removal of 88 protected trees.
- 3.95 acres of landscaped open space and 4.15 acres of "undeveloped space."
- Relocation of the helipad from the east side of the existing hospital to the southwestern interior portion of the site.

The approved project was constructed in 2011 and has since been operational.

REGIONAL MAP | FIGURE 2.1-1

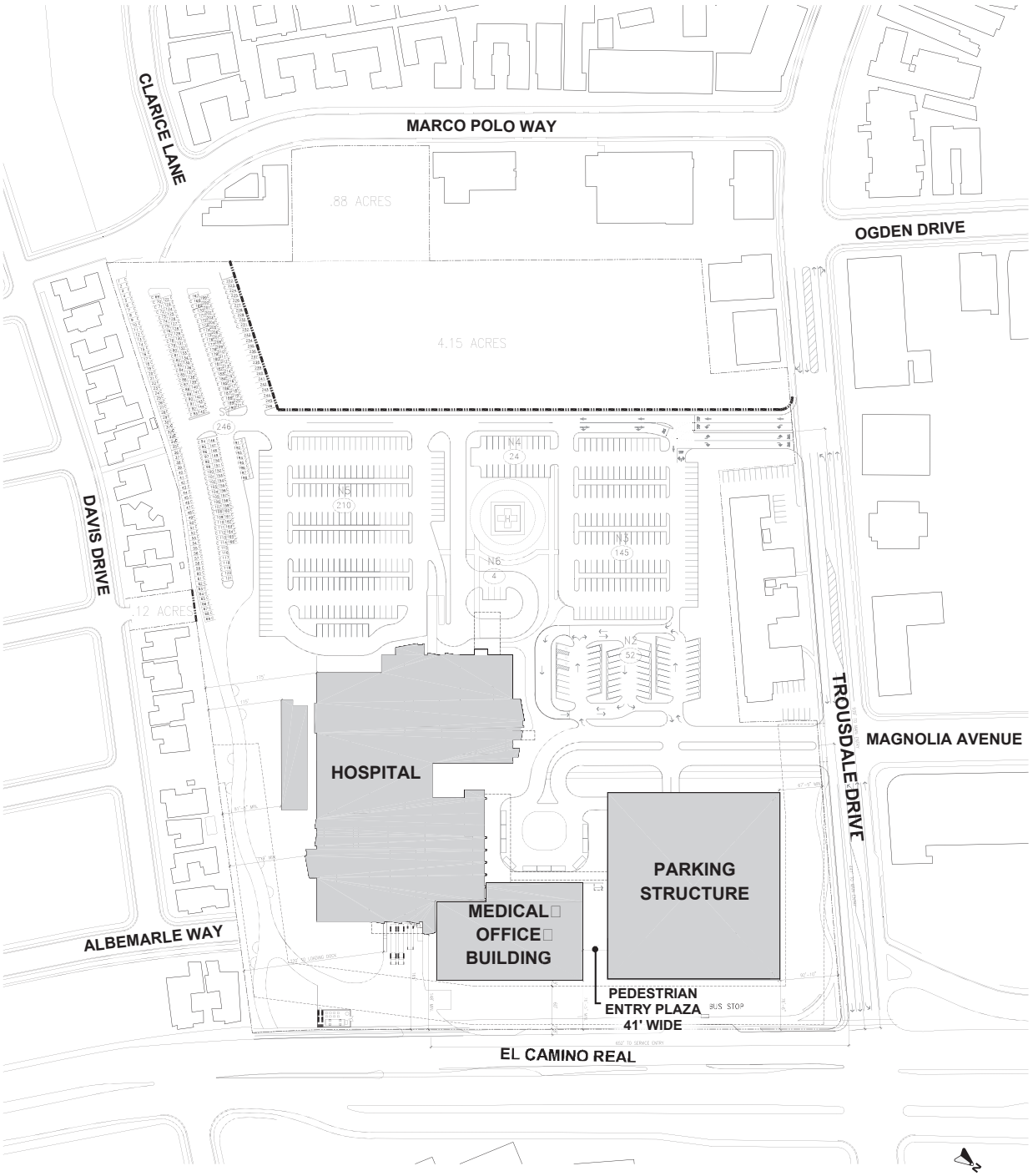
VICINITY MAP

FIGURE 2.1-2



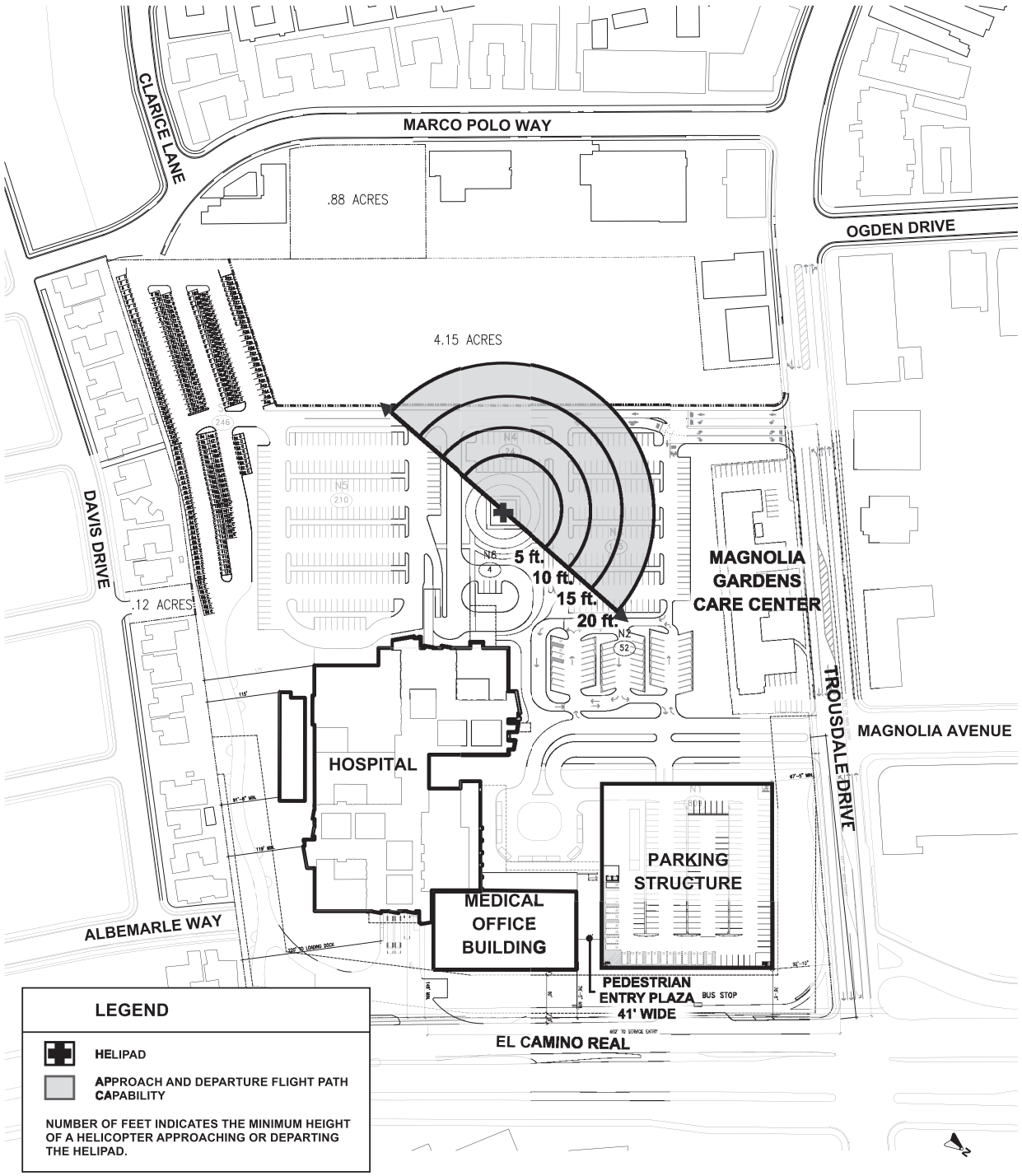
AERIAL MAP

FIGURE 2.1-3



Source: Anshen + Allen Architects, 2004.

APPROVED PROJECT SITE PLAN | FIGURE 2.2-1



Source: Anshen + Allen Architects, 2004.

APPROVED HELICOPTER APPROACH | FIGURE 2.2-2

2.3 Summary of Modified Project

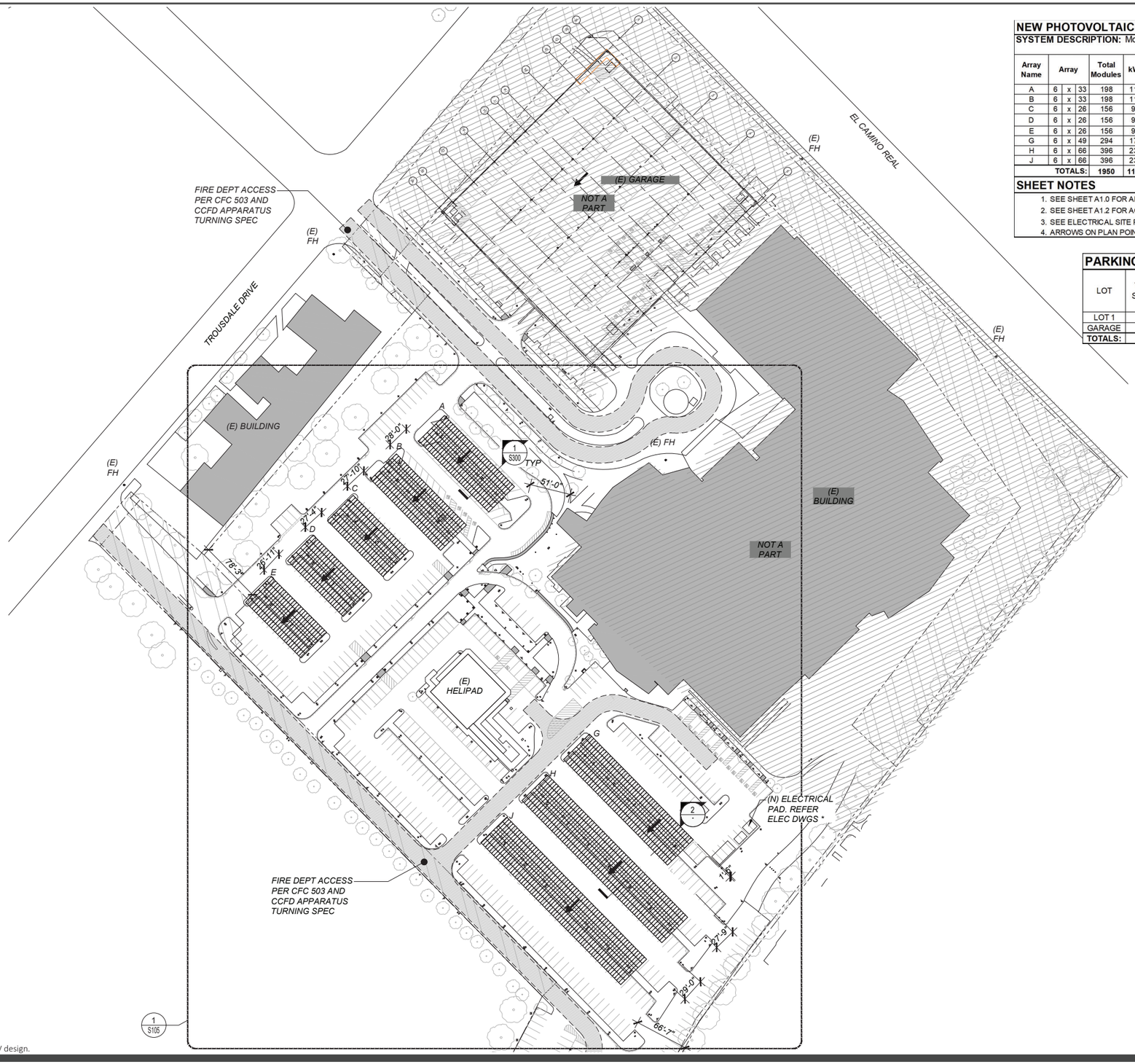
The project applicant proposes an amendment to the CUP to allow for the construction of eight carport-style solar modules in the surface parking lot of the hospital (referred to herein as the "modified project"). The modified project consists of the following components:

- Installation of eight photovoltaic (PV) solar power arrays over the existing surface parking lot located southwest of the hospital building;
- Removal of 121 landscaping trees[1] located within the existing surface parking lot; and
- Removal of eight existing surface parking spaces in order to accommodate the energy storage units and electrical infrastructure.
- Amendment to CUP to remove unenforceable Condition of Approval # 45 regulating helipad trips.

2.3.1 Construction

Construction of the solar power arrays would occur over a period of 21 weeks.

[1] None of the 121 trees are considered protected trees under Burlingame Municipal Code Chapter 11.06.



Source: MMPV design.

NEW PHOTOVOLTAIC ARRAY CODE ANALYSIS: MILLS PENINSULA LOT 1

SYSTEM DESCRIPTION: Module Type JA SOLAR JKM585N-75HL4-BDV (2278mm x 1134mm x 30mm) 31.6 kg

Array Name	Array	Total Modules	kW DC	No. of Cols	Minimum Clear Height	Azimuth	Tilt	Occupancy	Const. Type	Area	Allowable Area
A	6 x 33	198	115.80	4	10'-0"	226 °	7 °	S-2	II-B	5,573 SF	-
B	6 x 33	198	115.83	4	10'-0"	226 °	7 °	S-2	II-B	5,573 SF	-
C	6 x 26	156	91.26	3	10'-0"	226 °	7 °	S-2	II-B	4,391 SF	-
D	6 x 26	156	91.26	3	10'-0"	226 °	7 °	S-2	II-B	4,391 SF	-
E	6 x 26	156	91.26	3	10'-0"	226 °	7 °	S-2	II-B	4,391 SF	-
G	6 x 49	294	171.99	5	10'-0"	226 °	7 °	S-2	II-B	8,276 SF	-
H	6 x 66	396	231.66	7	10'-0"	226 °	7 °	S-2	II-B	11,148 SF	-
J	6 x 66	396	231.66	7	10'-0"	226 °	7 °	S-2	II-B	11,148 SF	-
TOTALS:		**1950**	**1140.72**	**36**				**TOTAL PROJECT AREA:**		**54,891 SF**	**UNLIMITED**

SHEET NOTES

1. SEE SHEET A1.0 FOR ARRAY DIMENSIONS
2. SEE SHEET A1.2 FOR ACCESSIBILITY PLAN SHOWING NEW AND EXISTING ACCESSIBLE CONDITIONS
3. SEE ELECTRICAL SITE PLAN FOR POC INFORMATION AND LOCATION
4. ARROWS ON PLAN POINT TO LOW SIDE OF CANOPY

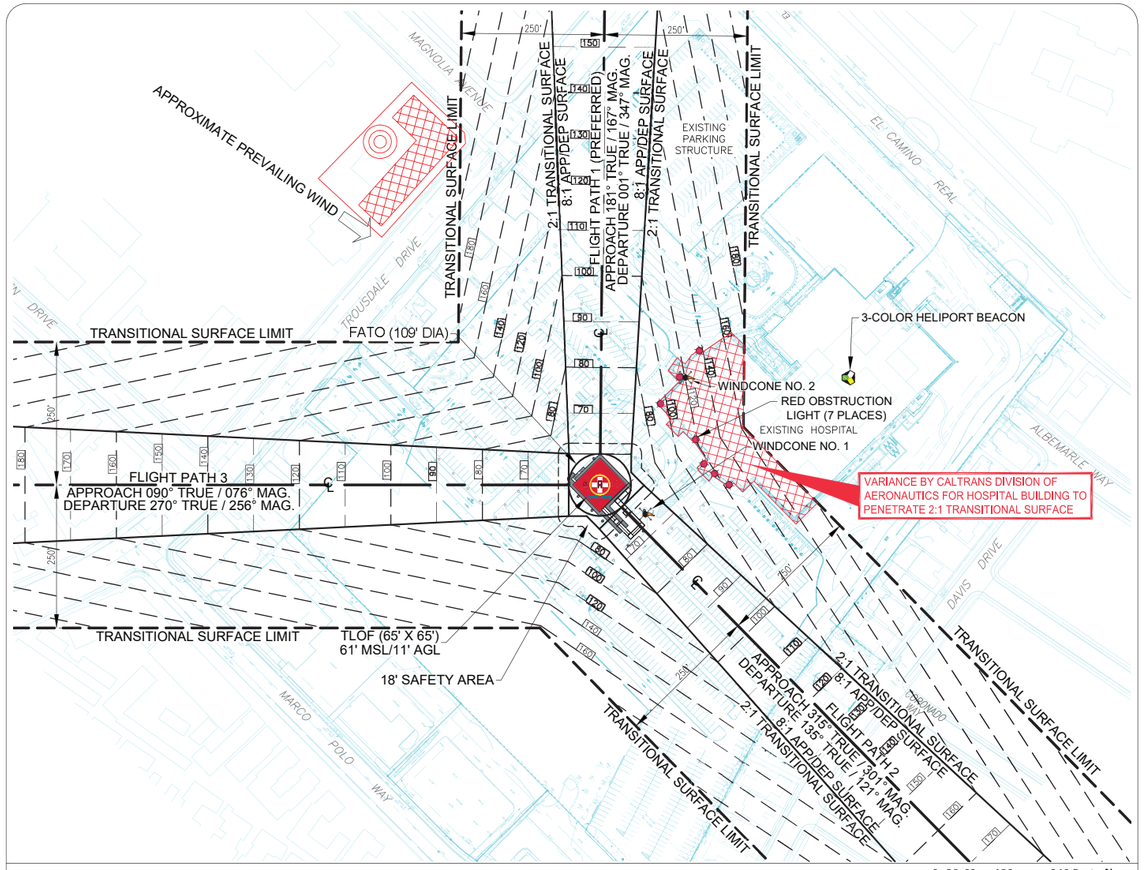
PARKING ANALYSIS: MILLS PENINSULA

LOT	TOTAL STALLS	REQ'D ACCESSIBLE STALLS	PROVIDED ACCESSIBLE STALLS	COVERED STANDARD STALLS	RATIO: COVERED TO UNCOVERED	REQ'D COVERED ACCESSIBLE STALLS	PROVIDED COVERED ACCESSIBLE STALLS
LOT 1	695	13	18	260	37%	5	13
GARAGE	191	6	12	191	100%	6	10
TOTALS:	**886**	**17**	**30**	**451**	**51%**	**11**	**23**

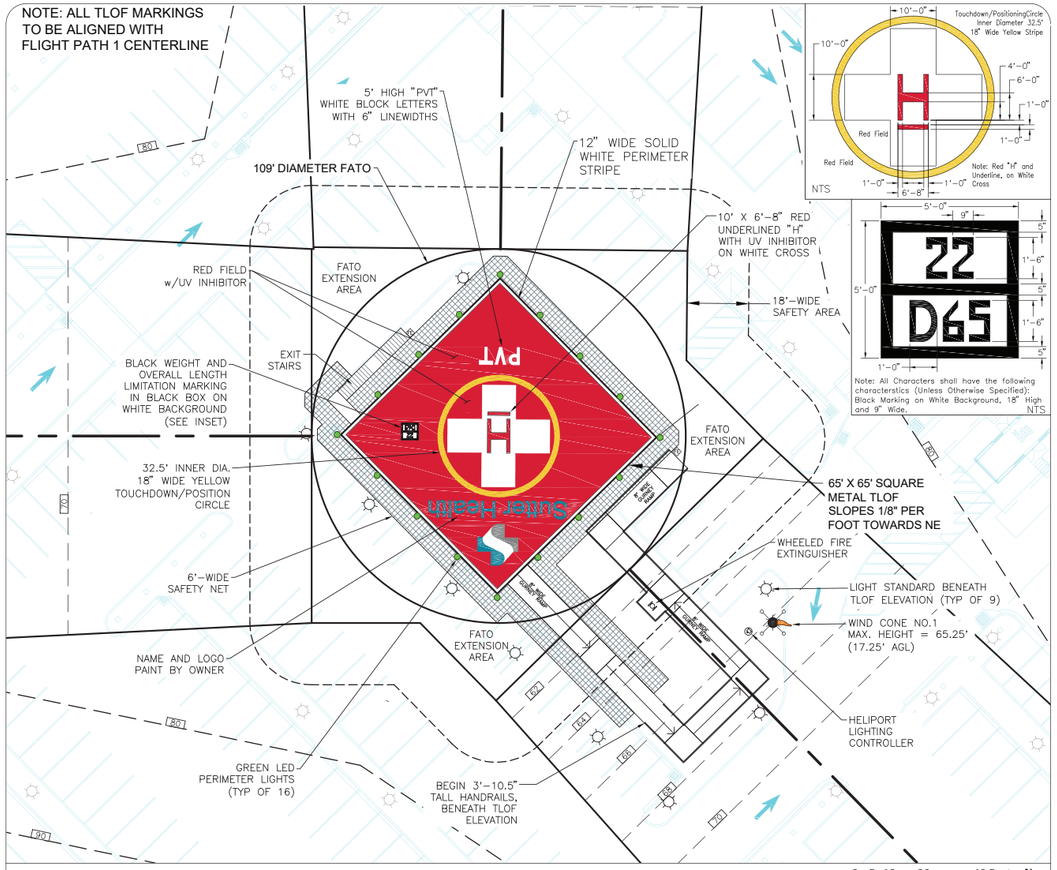
** ELECTRICAL EQUIPMENT SHALL BE APPROVABLE IF IT IS LISTED, LABELED, OR CERTIFIED FOR ITS USE BY A NATIONALLY RECOGNIZED TESTING LABORATORY (NRTL) AS RECOGNIZED BY THE U.S. DEPARTMENT OF LABOR, OCCUPATIONAL SAFETY, AND HEALTH ADMINISTRATION. 2022 CEC SECTIONS 110.2 AND 110.3*

0 15 30 60 120 Feet N

MODIFIED PROJECT SITE PLAN | FIGURE 2.3-1



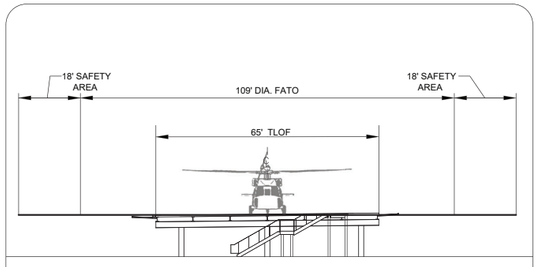
SITE LAYOUT



HELIPORT DETAIL

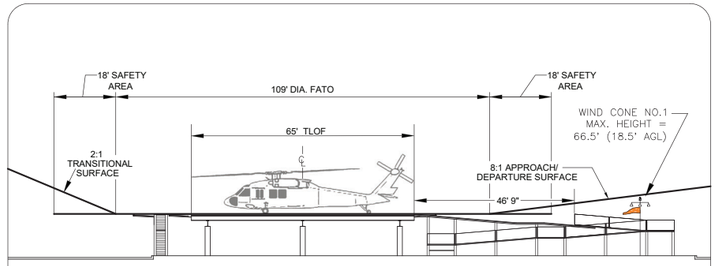
HELIPORT DATA PANEL

Heliport name		Mills Peninsula Medical Center Heliport		Elevation	Above mean sea level (MSL) 61' (rounded)
Street Address		1501 Trousdale Drive, Burlingame, CA 94010			Above ground level (AGL) 11'
Usage (public/private)		Private	Composite design helicopter	Model(s)	Sikorsky UH-60 Blackhawk
FAA airspace case number		2016-AWP-1879-NRA		Maximum main rotor diameter	54
FAA airspace determination letter date		October 21, 2016		Maximum overall length	65
FAA Heliport Design advisory circular in effect at time of design		AC 150/5390-2C		Maximum gross takeoff weight	22,000 Pounds
FAA Heliport Design advisory circular heliport classification		Hospital		Maximum fuel capacity	354 Gallons
NFPA Publication #418, Heliports, heliport classification		H-2	Heliport design criteria	FATO (final approach & takeoff area) length & width (or diameter)*	109' Diameter
State permit	Heliport Site Approval Permit number & date	--		TLOF (touchdown & liftoff area) length & width	65' x 65'
	Heliport Permit number & date	--		Safety area width*	18'
City or county use permit	Permit number & date	--		Total unobstructed width (FATO plus safety area on each side)*	145'
Geographic coordinates (NAD 83) at heliport center	Latitude	37° 35' 30.55"		Fuel/water separator: minimum fuel retention capacity	N/A
	Longitude	122° 23' 01.77"		TLOF surface material	Metal
Local magnetic declination (to nearest degree)		14°		TLOF surface gradient & direction	1% Toward - Northeast
Approach course alignments (magnetic)		167° / 301° / 076°		Center-to-center TLOF separation (where applicable)	N/A
Departure course alignments (magnetic)		347° / 121° / 256°		Lighting Activation - Aviation Lighting	Pilot-Controlled - 123.05 MHz
				Lighting Activation - Gurney Ramp Lighting	Manual Control
				*No objects allowed above TLOF elevation within FATO or Safety Area (except maximum 2" height for perimeter lighting)	



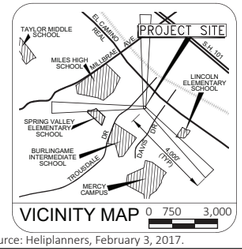
NOTE: ELEVATION VIEW FOR ORIENTATION ONLY; DOES NOT NECESSARILY DEPICT CONSTRUCTION ACCURACY.

NORTHWEST ELEVATION 0 5 10 20 40 Feet



NOTE: ELEVATION VIEW FOR ORIENTATION ONLY; DOES NOT NECESSARILY DEPICT CONSTRUCTION ACCURACY.

SOUTHWEST ELEVATION 0 5 10 20 40 Feet



VICINITY MAP 0 750 3,000

LEGEND

	Lighted LED windcone w/red obstruction light and 4 floodlights (FEC Heliports Model HP0590P, or equivalent)
	LED Obstruction light (red) (FEC Heliports Model HP0500 W/Relay, or equivalent)
FE	Portable Fire Extinguisher (Rating 20-A: 120-BC Per Combined NFPA 418 and California Fire Code Standards) (exact location to be determined by architect or engineer)
	Green LED NVG-Compatible perimeter light (FEC Heliports Model HP0560P, or equivalent)
80	Elevations and airspace contours expressed as feet above Mean Sea Level (MSL)
	3-Color (Green-White-Yellow) Heliport Rotating Beacon

Source: Heliplanners, February 3, 2017.

CALTRANS HELIPORT PERMIT FLIGHT APPROACHES | FIGURE 2.3-2

Section 3.0 Environmental Impacts of the Modified Project

In accordance with CEQA Section 21093(b) and CEQA Guidelines Section 15152(a), this Addendum tiers from the certified 2004 FEIR.

The discussion below describes the environmental impacts of the modified project compared to the impacts disclosed in the 2004 FEIR. This Addendum only addresses resource areas which would be potentially affected by the proposed changes described in Section 2.3 Summary of Modified Project. Since certification of the FEIR and approval of the CUP, the approved project was constructed and has been in operation since 2011.

The modified project would result in the installation of eight PV solar power arrays over the existing surface parking located southwest of the hospital building. The modified project would result in the removal of 121 landscaping trees and eight existing surface parking spaces, and would eliminate Condition of Approval #45 of the CUP regulating helipad trips.

The Addendum accordingly evaluates potential impacts associated with the project, including analysis of existing helipad operations under the project's Caltrans-issued heliport permit compared to those analyzed in the FEIR.

This section presents the discussion of impacts related to the following environmental subjects in their respective subsections:

3.1 Resource Areas Not Analyzed Further

The following resource areas are not analyzed further because proposed changes in the modified project do not relate to these resource areas and they were determined to have the same impacts as analyzed in the 2004 FEIR. A brief explanation is provided for each resource topic.

3.1.1 Agriculture and Forestry

The 2004 FEIR found that the approved project would have no impact on agricultural resources.[2] The project is located on a developed site in an urbanized area of Burlingame that is not designated or zoned for agricultural uses, is not under a Williamson Act contract, and is not considered forest land or zoned Timberland Production. The modified project would occur within the same site as the

[2] City of Burlingame. *Final Environmental Impact Report for the Peninsula Hospital Replacement Project*. September 16, 2004. SCH # 2003072005. Appendix B.

approved project and therefore, would also have no impact on agricultural or forestry resources. For these reasons, the modified project would not result in new or substantially more severe significant agriculture and forestry impacts than disclosed in the 2004 FEIR. **[Same Impact as the Approved Project (No Impact)]**

3.1.2 Cultural Resources

The 2004 FEIR disclosed that there are no known cultural resources located on the project site, and therefore none would be affected by the approved project.[3] To prevent impacts to subsurface resources, the approved project was required to implement standard stop-work mitigation measures to reduce the potential for impacts to unknown subsurface cultural resources. The modified project does not involve grading and would install eight PV solar power arrays over the existing surface parking lot of the hospital. For these reasons, the modified project would not result in new or substantially more severe significant cultural resources impacts than disclosed in the 2004 FEIR. **[Less Impact than the Approved Project (Less than Significant Impact)]**

3.1.3 Energy

The modified project involves the installation of eight PV solar power arrays over the existing surface parking lot of the hospital building that would generate carbon-free electricity to offset the existing hospital's energy consumption. The applicant estimates the system will generate 3,750 megawatts of energy annually[4]. This available electricity would replace other sources of electricity that would likely be generated through fossil fuel combustion, primarily power generated by power generating facilities that use natural gas. For these reasons, the modified project would not result in new or substantially more severe significant energy impacts than disclosed in the 2004 FEIR. **[Less Impact than the Approved Project (Less than Significant Impact)]**

3.1.4 Geology and Soils

The 2004 FEIR concluded that conformance with the California Building Code (CBC) would reduce geological impacts from the approved project to less than significant.[5] The modified project involves the installation of eight PV solar power arrays over the existing surface parking located southwest of the hospital building. Consistent with the approved project, the modified project would be required to comply with the CBC thereby reducing geologic impacts to less than significant. For these reasons, the modified project would not result in new or substantially more severe significant geology and soils impacts than disclosed in the 2004 FEIR. **[Same Impact as the Approved Project (Less than Significant Impact)]**

[3] City of Burlingame. *Final Environmental Impact Report for the Peninsula Hospital Replacement Project*. September 16, 2004. SCH # 2003072005. Appendix B.
[4] AMERESCO. Letter to Burlingame Planning & Zoning regarding the project description. Submitted by Matthew Brausch, Project Development Manager. May 23, 2025.
[5] Ibid.

3.1.5 Greenhouse Gas Emissions

The 2004 FEIR did not evaluate impacts from greenhouse gas (GHG). This resource area was not added to the Appendix G checklist until 2010, after the certification of the 2004 FEIR. An Air Quality Assessment (Appendix A) completed by Illingworth & Rodkin, Inc. dated June 9, 2026 calculated construction and operational GHG emissions from the modified project. GHG emissions associated with construction would be minor and were computed at 21 metric tons for the entire construction period. Neither the City nor the Bay Area Air District have thresholds of significant for construction GHG emissions.

Operation of the helipad, based on a maximum of 117 helicopter operations per year, is estimated to result in emissions of 62 metric tons of GHG per year. The Air District has not established thresholds that apply to aircraft. The thresholds for land use projects are intended to guide design to meet future California's Climate Change Scoping Plan goals to reduce GHG emissions by 85 percent below 1990 levels in 2030 and become carbon neutral by 2045. The State's plan to reduce aviation emissions in the future will rely on reformulation of fuels and incorporation of more efficient aircraft and aircraft operations in the future.

The Project would construct solar arrays that would generate carbon-free electricity. The applicant estimates the system will generate 3,750 megawatts of energy annually[6]. This available electricity would replace other sources of electricity that would likely be generated through fossil fuel combustion, primarily power generated by power generating facilities that use natural gas. The energy produced by the solar power arrays would be used to offset the existing hospital's energy consumption and related GHG emissions by as much as 1,500 metric tons GHG annually. For these reasons, the modified project would reduce the amount of GHG emissions compared to the approved project, and not result in new or substantially more severe significant GHG impacts than disclosed in the 2004 FEIR. **[Less Impact than the Approved Project (Less than Significant Impact)]**

3.1.6 Hazards and Hazardous Materials

The 2004 FEIR concluded that the approved project would have less than significant impacts related to hazards and hazardous materials with the incorporation of mitigation measure HM-1.1, HM-2.1, and HM-2-2, which required pre-construction surveys prior to demolition of the former hospital buildings and the implementation of a health and safety plan during construction of the now operational hospital. These mitigation measures were already completed as part of the approved project. While construction of the modified project could involve the use of potentially hazardous materials, including vehicle fuels, oils, and fluids, it does not involve any demolition. All hazardous materials would be transported, contained, stored, used, and disposed of in accordance with manufacturers' instructions and would be handled in compliance with all applicable standards and regulations. Construction-related hazardous materials use would be temporary, and does not constitute routine transport, use, or disposal. For these reasons, the modified project would not

[6] AMERESCO. Letter to Burlingame Planning & Zoning regarding the project description. Submitted by Matthew Brausch, Project Development Manager. May 23, 2025.

result in new or substantially more severe significant hazards and hazardous materials impacts than disclosed in the 2004 FEIR. **[Less Impact than the Approved Project (Less than Significant Impact)]**

3.1.7 Hydrology and Water Quality

The 2004 FEIR concluded that the approved project would result in less than significant impacts to hydrology and water quality through the implementation of a Storm Water Pollution Prevention Plan (SWPPP), which would include best management practices to reduce pollution in storm water runoff.[7] The modified project would not disturb more than one acre of soil, therefore, a SWPPP is not required, and the modified project would not introduce additional areas of impervious surfaces, nor would it alter existing grades, therefore there would be no alteration of existing drainage patterns. For these reasons, the modified project would not result in new or substantially more severe significant hydrology and water quality impacts than disclosed in the 2004 FEIR. **[Less Impact than the Approved Project (Less than Significant Impact)]**

3.1.8 Land Use and Planning

The modified project would not involve any features that would divide an established community, such as a large roadway or walls. Burlingame City Council adopted the 2040 General Plan on January 7, 2019, followed by adoption of the updated Zoning Code on December 6, 2021. With these updates the project site was rezoned from C-1 to P/I (Public/Institutional). The modified project would be consistent with the site's previous C-1 and current P/I zoning district regulations. Consistent with the approved project, the modified project requires a CUP (in both the C-1 and P/I zoning districts). For these reasons, the modified project would not result in new or substantially more severe significant land use impacts than disclosed in the 2004 FEIR. **[Same Impact as the Approved Project (Less than Significant Impact)]**

3.1.9 Mineral Resources

The 2004 FEIR found that there are no known mineral resources on the proposed project site and therefore the approved project would have no impact on mineral resources.[8] The modified project would occur at the same project site and would not impact mineral resources. For these reasons, the modified project would not result in new or substantially more severe significant mineral resources impacts than disclosed in the 2004 FEIR. **[Same Impact as the Approved Project (No Impact)]**

3.1.10 Population and Housing

The 2004 FEIR found that the approved project would not include housing nor would it eliminate existing housing and would therefore result in less than significant impacts to population and

[7] City of Burlingame. *Final Environmental Impact Report for the Peninsula Hospital Replacement Project*. September 16, 2004. SCH # 2003072005.
[8] Ibid. Appendix B.

housing.[9] The modified project involves installation of solar array over the existing hospital parking and would not include housing or eliminate any housing. For these reasons, the modified project would not result in new or substantially more severe significant impacts to population and housing than disclosed in the 2004 FEIR. **[Same Impact as the Approved Project (Less than Significant Impact)]**

3.1.11 Public Services

The 2004 FEIR concluded that the approved project would have no impact on public services.[10] The modified project involves installation of solar arrays over an existing parking lot of the hospital and would not increase demand for public services. For these reasons, the modified project would not result in new or substantially more severe significant public services impacts than disclosed in the 2004 FEIR. **[Same Impact as the Approved Project (No Impact)]**

3.1.12 Recreation

The 2004 FEIR concluded that the approved project would have less than significant impacts on recreation facilities.[11] The approved project would have the potential to indirectly result in employees choosing to move to the area and use local recreational facilities. The hospital has been operational since 2011; therefore, this indirect impact has already occurred. The modified project would not alter employment levels at the hospital and would not have the potential to increase the use of recreational facilities. For these reasons, the modified project would not result in new or substantially more severe significant recreation impacts than disclosed in the 2004 FEIR. **[Less Impact than the Approved Project (No Impact)]**

3.1.13 Transportation

The 2004 FEIR found that the approved project would result in significant and unavoidable transportation impacts due to inadequate parking during construction of the approved project.[12] All other transportation impacts would be reduced to less than significant with the incorporation of mitigation measures TR-1.1, TR-2.1 through TR-2.6, TR-3.1, TR-6.1 through TR-6.2, and TR-8.1. These measures were all implemented as part of the approved project. While the modified project would result in the loss of eight surface parking spaces, parking is no longer considered a significant environmental impact. The introduction of solar arrays would not generate additional vehicle, pedestrian, or bicycle trips to the hospital, or interfere with existing transportation facilities serving the site and surrounding area. For these reasons, the modified project would not result in new or substantially more severe significant transportation impacts than disclosed in the 2004 FEIR. **[Less Impact than the Approved Project (No Impact)]**

[9] City of Burlingame. Final Environmental Impact Report for the Peninsula Hospital Replacement Project. September 16, 2004. SCH # 2003072005. Appendix B.
[10] Ibid.
[11] Ibid.
[12] City of Burlingame. Final Environmental Impact Report for the Peninsula Hospital Replacement Project. September 16, 2004. SCH # 2003072005.

3.1.14 Utilities and Service Systems

The 2004 FEIR concluded that the approved project would result in less than significant utilities and service system impacts with the incorporation of mitigation measure UT-5.1, which required that the approved project include water conservation measures in the hospital building and landscaping.[13] The hospital building has been operational since 2011 and these measures were implemented as part of the approved project. The modified project involves the installation of solar power arrays over the existing surface parking of the hospital building and would not result in impacts to utilities and service systems, as the solar arrays would not require water, generate wastewater, generate solid waste, or increase the employment or patient levels at the hospital. For these reasons, the modified project would not result in new or substantially more severe significant utilities impacts than disclosed in the 2004 FEIR. **[Less Impact than the Approved Project (Less than Significant Impact)]**

3.1.15 Wildfire

The 2004 FEIR concluded that the project site is located in a developed urban infill area and is not adjacent to or intermixed with wildlands.[14] As a result, the approved project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. The modified project would occur at the same project site; therefore, the modified project would not exacerbate wildfire hazards at the site. For these reasons, the modified project would not result in new or substantially more severe significant wildfire impacts than disclosed in the 2004 FEIR. **[Same Impact as the Approved Project (No Impact)]**

3.1.16 Conclusion

Based on the discussion above, the modified project would result in the same or lesser impacts for those topics discussed above, than the project evaluated in the 2004 FEIR. For these reasons, the modified project would not result in new or substantially more severe significant a impacts than disclosed in the 2004 FEIR.

[13] Ibid.

[14] City of Burlingame. Final Environmental Impact Report for the Peninsula Hospital Replacement Project. September 16, 2004. SCH # 2003072005. Appendix B.

3.2 Aesthetics

3.2.1 Environmental and Regulatory Setting

The approved project consisted of replacing an existing hospital with a new hospital building and medical office building. Additionally, the approved project required the removal of 88 protected trees and was conditioned to replace trees in accordance with the City's Tree and Vegetation Ordinance.

Senate Bill 743

Senate Bill (SB) 743 was adopted in 2013 and requires lead agencies to use alternatives to level of service (LOS) for evaluating transportation impacts, specifically vehicle miles traveled (VMT). SB 743 also included changes to CEQA that apply to transit-oriented developments, as related to aesthetics and parking impacts. Under SB 743, a project's aesthetic impacts will no longer be considered significant impacts on the environment if:

- The project is a residential or mixed-use residential project, or employment center project and
- The project is located on an infill site within a transit priority area (TPA).[15]

SB 743 also clarifies that local governments retain their ability to regulate a project's aesthetics impacts outside of the CEQA process. The project site is located within a TPA.[16]

3.2.2 2004 FEIR Aesthetics Findings

The FEIR concluded that the approved project would result in significant and unavoidable visual impacts due to the following factors:

- The approved would alter the visual setting and significantly affect viewer groups in the Davis Drive neighborhood.

[15] An "infill site" is defined as "a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses." A "transit priority area" is defined as "an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan." A "major transit stop" means "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Source: California Legislative Information. "Chapter 2.7. Modernization of Transportation Analysis for Transit-Oriented Infill Projects [21099- 21099.]." Accessed April 13, 2023. https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=13.&part=&chapter=2.7.&article=.

[16] Metropolitan Transportation Commission. Transit Priority Areas (2021). Accessed August 22, 2025. https://opendata.mtc.ca.gov/datasets/MTC::transit-priority-areas-2021-1/explore?location=37.339970%2C-121.895569%2C15.33

The FEIR imposed the following mitigation measures on the approved project:

- **Mitigation Measures LU-5.1:** (to revise the landscaping plan to include tree species to mask the screen wall and continue Burlingame's "tree theme" using trees from the City's tree list and as recommended in the proposed North Burlingame/Rollins Road Specific Plan) and VQ-1.1 (below) combined could reduce visual impacts of the screen wall on El Camino Real; however, even with the proposed mitigation, the visual impacts due to loss of the open space character would remain significant and unavoidable.
- **Mitigation Measure VQ-1.1:** Incorporate design features to minimize the apparent mass of the screen wall. The project sponsor shall incorporate design features into the screen wall façade to reduce the mass of the wall. The design features, including articulation and variations in textures and color, shall be sufficient to create a sense of segmentation along the screen wall so that a sense of solid massing throughout the wall is avoided.
- **Mitigation Measure VQ-1.2:** Set back upper floors of the MOB. The project sponsor shall modify the design of the MOB to set back the upper floors of the MOB along its southeastern elevation. The purpose of this measure is to increase the separation between the viewers and the MOB so that a sense of open space and views of the sky are maintained for viewers along Davis Drive. The initial setback from the building façade facing Davis Drive shall be at the fourth floor and extend a depth of one bay (30 feet). The fifth floor shall then be set back an additional 30 feet.
- **Mitigation Measure VQ-6.1:** Implement Construction Visual Improvements Plan to reduce visual quality degradation by phase construction. The project sponsor shall agree to develop and implement a Construction Visual Improvements Plan that would make visual improvements to construction zones within a given construction phase and between phases if the zone is not scheduled for construction activity or will remain unused for a period greater than six months. Construction zones subject to this mitigation measure shall be defined by the City Planner, plan shall consider the size of the area, the nature of the construction activity, and the proximity or visibility of the area to public vantage points or residential uses. The Construction Visual Improvements Plan shall be implemented by the project contractor(s) and must be approved by the City Planner. The intent of the plan is to aesthetically improve portions of the project site that would remain unimproved for an extended period and screen the construction zone from view by passersby along the public streets and sidewalks, or to make the zone usable for MPHS employees, patients, and the public. Possible improvements in the plan include, but are not limited to, the following (if timelines other than six months are specified below, the shorter of six months or the time specified below shall apply):
    a. The project sponsor shall clear a construction zone of construction debris and remove construction equipment whenever construction is not anticipated for at least two weeks.
    b. If a site is a construction zone, but no construction activities are scheduled for more than one month, the project sponsor shall be responsible for regular garbage removal and watering of any existing landscaping.
    c. The project sponsor shall remove or visually treat fencing around construction zones that front onto El Camino Real, Trousdale Drive, Marco Polo Way, or Davis Drive in a

manner deemed acceptable by the Chief Building Official, in order to promote safety, connectivity through the site, and pedestrian friendliness.

d. If a site is not in use as a construction zone for more than six months due to demolition or construction of a structure, the project sponsor shall improve the site with landscaping (e.g., trees, shrubs, and groundcover), passive recreation/open space facilities (e.g., benches, picnic tables), decorative fencing and/or seating walls, and pedestrian and bicycle routes that connect to adjacent open spaces. Pedestrian/bicycle networks shall be defined by and to the satisfaction of the City Planner.
e. The project sponsor shall install all landscaping as early as possible to decrease visual impacts of construction.

3.2.3 Analysis of Modified Project

The modified project would meet the criteria of SB 743 because 1) the hospital is an employment center and 2) the project is located within a transit priority area. Consistent with Public Resources Code Section 21099, the modified project would have a less than significant aesthetics impact.

Since certification of the FEIR, the replacement hospital, medical office building, parking structure, and associated improvements have been constructed, including replacement trees in accordance with the City's Tree and Vegetation Ordinance. There is a total of 371 on-site trees, the majority of which are parking lot trees.[17]

3.2.3.1 *Scenic Vistas*

The FEIR concluded that the approved project would alter the visual setting and significantly affect viewer groups along El Camino Real and viewer groups in the Davis Drive neighborhood. The approved project was constructed in 2011 and has since been operational. Therefore, these impacts have already occurred. The modified project would introduce eight PV solar power arrays over the existing surface parking lot located southwest of the hospital building and remove 121 landscaping trees. These modifications would not alter the visual setting along El Camino Real or the Davis Drive neighborhood beyond what has already occurred at the site. The hospital building would block views of the modified project from El Camino Real. The proposed PV solar power arrays would have a minimum clearance of 10 feet and a maximum height of approximately 19 feet and six inches. As shown in Figure 3.2-1, the modified project would be mostly below the existing tree canopy and would not result in substantial visual impact on the Davis Drive neighborhood. **[Less Impact than the Approved Project (Less than Significant Impact)]**

[17] BrightView. *Tree Evaluation for Sutter Mills-Peninsula, California.* April 26, 2022.

Source: MMPV design.

PROPOSED RENDERINGS | FIGURE 3.1-1

3.2.3.2 *Scenic Resources in a State Scenic Highway*

Interstate 280 (I-280), located 1.3 miles west of the project site, is officially designated as a State Scenic Highway. The modified project would not be visible from I-280. **[Same Impact as the Approved Project (Less than Significant Impact)]**

3.2.3.3 *Regulations Governing Scenic Quality*

The modified project proposes to remove 121 existing on-site trees, none of which are protected. Since the modified project would not remove protected trees, the project would not conflict with the City's Urban Reforestation and Tree Protection Ordinance (BMC 11.06) and would not be required to replace the trees that will be removed. Because the project was submitted November 8, 2023, prior to the January 16, 2025 effective date of the updates to BMC 11.06 , the project is not subject to the current in-lieu fee requirements for tree removals without replacements. **[Same Impact as the Approved Project (Less than Significant Impact)]**

3.2.3.4 *Light and Glare*

The modified project would introduce PV solar arrays at the project site. The solar modules would be covered with an anti-reflective coating, which serves to diffuse light and reduce glare. A glare analysis was conducted to determine whether the project would result in substantial glare.[18] The results of the analysis indicate that the project would not result in substantial light or glare. **[Same Impact as the Approved Project (Less than Significant Impact)]**

3.2.4 Conclusion

As documented above, the modified project would not result in new or substantially more severe significant aesthetics impacts than disclosed in the 2004 FEIR. Furthermore, consistent with Public Resources Code Section 21099, the modified project would have a less than significant aesthetics impact.

[1818] ForgeSolar. *ForgeSolar Glare Analysis Mills Peninsula Medical Center*. June 21, 2022.

3.3 Air Quality

The following discussion is based, in part, on an Air Quality Assessment completed by Illingworth & Rodkin, Inc. dated June 9, 2026. This report is included as Appendix A to this Addendum.

3.3.1 Environmental Setting and Regulatory Setting Updates

The approved project consisted of replacing an existing hospital with a new hospital building and medical office building. The approved project was constructed in 2011 and has since been operational.

3.3.1.1 *2017 Clean Air Plan*

The Bay Area Air District (Air District) is the agency primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area, which includes the project area. Regional air quality management districts, such as the Air District, must prepare air quality plans specifying how federal and state air quality standards will be met. The Air District's most recently adopted plan is the Bay Area 2017 Clean Air Plan (CAP). The 2017 Clean Air Plan focuses on the following two related Air District goals and how to achieve them:

- Protect air quality and health at the regional and local scale by attaining all state and national air quality standards and eliminating disparities among Bay Area communities in cancer health risk from TAC; and
- Protect the climate by reducing Bay Area greenhouse gas (GHG) emissions 40 percent below 1990 levels by 2040 and 80 percent below 1990 levels by 2050.

3.3.1.2 *CEQA Air Quality Guidelines*

The Air District CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. Jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing air quality impacts developed by the Air District within their CEQA Air Quality Guidelines. The guidelines include information on legal requirements, Air District rules, methods of analyzing impacts, and recommended mitigation measures. The latest CEQA Air Quality Guidelines are the 2022 CEQA Air Quality Guidelines adopted on April 20, 2023 by the Air District's Board of Directors.

3.3.2 2004 FEIR Air Quality Findings

The 2004 FEIR found that the approved project's operational emissions of ROG, NOx, and PM_{10} would not exceed the significance threshold of 80 pounds per day.[19] The 2004 FEIR found that construction air quality impacts would be less than significant with the implementation of the following mitigation measures:

[19] The Air District's current threshold for ROG is 54 pounds per day.

- **Mitigation Measure AQ-1:** Implement recommended dust control measures. To reduce particulate matter emissions during project demolition and construction phases, the project sponsor shall require the construction contractors to comply with the dust control strategies developed by the BAAQMD. The project sponsor shall include in construction contracts the following requirements:
    a. Cover all trucks hauling construction and demolition debris from the site;
    b. Water all exposed or disturbed soil surfaces at least twice daily;
    c. Use watering to control dust generation during demolition of structures or break-up of pavement;
    d. Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved parking areas and staging areas;
    e. Sweep daily (with water sweepers) all paved parking areas and staging areas during the earthwork phases of construction;
    f. Provide daily clean-up of mud and dirt carried onto paved streets from the site;
    g. Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.);
    h. Limit traffic speeds on unpaved roads to 15 mph;
    i. Install sandbags or other erosion control measures to prevent silt runoff to public roadways; and
    j. Replant vegetation in disturbed areas as quickly as possible.

3.3.3 Analysis of Modified Project

3.3.3.1 *Conflict/Obstruct with an Air Quality Plan*

The 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; b) includes relevant control measures; and c) does not interfere with implementation of CAP control measures.

2017 Clean Air Plan

The modified project would not conflict with the 2017 CAP because it would not result in the generation of construction criteria air pollutants and/or precursors that exceed the thresholds shown in Table 3.3-1 (refer to discussion below). Thus, the modified project is not required to incorporate project-specific control measures listed in the 2017 CAP. Further, implementation of the project would not inhibit the Air District or partner agencies from continuing progress toward attaining state and federal air quality standards and eliminating health-risk disparities from exposure to air pollution among Bay Area communities, as described within the 2017 CAP. **[Same Impact as the Approved Project (Less than Significant Impact)]**

Construction Period Emissions

The California Emissions Estimator Model (CalEEMod) Version 2022 was used to compute emissions associated with modified project. Construction would involve removal of 121 trees, concrete demolition, drilling of support columns, installation and assembly of structures/modules, and construction traffic. Construction would occur over 102 days in 2026. Table 3.3-1 shows the estimated average daily air emissions from construction of the modified project.

Table 3.3-1: Construction Period Emissions for the Modified Project

Year	ROG	NOx	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Construction Emissions Total (Tons)				
2026	0.01	0.07	0.002	0.002
Average Daily Construction Emissions (pounds/day)				
2026 (102 construction workdays)	0.14	1.30	0.03	0.03
Bay Area Air District Thresholds (pounds per day)	54 lbs./day	54 lbs./day	82 lbs./day	54 lbs./day
Exceed Threshold?	No	No	No	No

As shown in Table 3.3-1, average daily emissions from the modified project are predicted to be well below the Air District significance thresholds. Consistent with the approved project, the modified project would implement Mitigation Measure AQ-1 to further reduce construction period emissions. **[Same Impact as the Approved Project (Less than Significant Impact with Mitigation Incorporated)]**

Operational Period Emissions – Criteria Pollutants

The modified project consists of modifications to an existing medical center that has been in operation since 2011. Therefore, the operational emissions associated with the existing medical center have already been accounted for in the 2004 FEIR. The modified project proposes to install solar arrays, which would not generate operational criteria pollutant emissions, as there would be no increase in the amount of vehicular traffic at the hospital nor additional building area. For these reasons, the modified project would not increase the existing hospital's operational criteria pollutant emissions. **[Same Impact as the Approved Project (Less than Significant Impact)]**

Helipad Usage

The existing helipad is regulated by CalTrans under a heliport permit. The 2004 FEIR did not assume and evaluate the amount of helicopter flights that have occurred since the 2011 implementation of the approved project, nor does the CalTrans permit limit the number of helicopter trips per year.

The FEIR for the approved project evaluated six helicopter trips per year, while the approved CUP allows up to 24 helicopter trips per year. The hospital averages between 79 and 117 trips per year.

To account for the observed usage of the helipad and the removal of CUP Condition of Approval 45 purporting to limit usage, the Addendum evaluates emissions associated with the maximum observed helicopter flights and compares them to Air District thresholds.

Helicopter operations result in emissions during two types of operations: landing-take-off (LTO) operation cycles and cruise.[20] These emissions were computed separately from CalEEMod based on published emission factors for various helicopter models.[21] Emissions from helicopter operations at a rate of 117 annual flights are presented in Table 3.3-2 below.

Table 3.3-2: Helicopter Air Pollutant Emissions

Type	Quantity[1]	NOx	HC	CO[b]	$PM_{10}/PM_{2.5}$
		Annual Emissions (tons/metric tons)			
BO 105	105	0.09	0.33	0.42	0.00
Bell 222 (Bell 429)	12	0.02	0.03	0.03	0.00
Total		0.11	0.36	0.46	<0.01
Air District Thresholds		**10**	**10**	**--**	**15/10**
		Average Daily Emissions (lbs/day)			
Total		0.6	1.9	2.5	<0.01
Air District Thresholds		**54**	**54**	**--**	**82/54**

[1] Number of annual flights = 117

[2] HC = Hydrocarbon

As shown in Table 3.3-2, annual and average daily emissions resulting from 117 annual flights are well below the Air District significance thresholds and would not cause any new or more severe impacts than previously identified in the FEIR. **[Same Impact as the Approved Project (Less than Significant Impact)]**

3.3.3.2 *Result in a Cumulatively Considerable Net Increase of a Criteria Air Pollutant*

As discussed above, the project would result in less than significant construction and operational criteria pollutant emissions. Because the modified project would have less than significant criteria pollutant impacts, it would not result in a cumulatively considerable contribution to any criteria pollutants for which the region is in non-attainment. **[Same Impact as the Approved Project (Less than Significant Impact)]**

[20] For this assessment, a single engine Hughes MD500E was assumed.

[21] The emissions account for 117 LTO cycles per day in addition to ¼ -hour of flight. Each helicopter landing was associated with two LTO cycles and one-half hour of flight cruise emissions.

3.3.3.3 *Expose Sensitive Receptors to Substantial Pollutant Concentrations*

Construction activities include use of diesel off-road equipment and heavy-duty diesel trucks. The modified project would result in temporary emissions from construction activities. As reported in Table 3.3-1 above, these emissions are quite small and well below the Air District thresholds. Construction is expected to last less than six months and be distributed throughout the parking lots, such that intense emissions are not occurring in any one location. Construction activities would occur about 100 to over 500 feet from nearby sensitive receptors. Extensive use of diesel-powered equipment would not occur. There would be some minor demolition of pavement; however, earthwork is not proposed. As a result, these temporary emissions would not pose any significant health risk impacts.

The modified project proposes to install solar arrays, which would not generate operational toxic air contaminant emissions, as there would be no increase in the amount of vehicular traffic at the hospital nor would the modified project involve other sources of TACs such as diesel back-up generators. For these reasons, the modified project would not increase the existing hospital's operational TACs emissions, and therefore, would not increase health risk impacts for surrounding residents and other sensitive receptors.

Finally, as described above, heliports are not a listed source of toxic air contaminants (TACs) by the California Air Resources Board or the Bay Area District. They involve infrequent aircraft operations and use aviation fuel, which does not emit the higher rate of TACs that diesel fuel emits. The heliport does not pose a health risk impact because the emissions from infrequent helicopters operations would not have substantial TAC emissions. **[Same Impact as the Approved Project (Less than Significant Impact)]**

3.3.3.4 *Other Emissions/Odors*

The modified project consists of the installation of eight PV solar power arrays in the existing parking lot of an operating hospital building. According to the Air District, industrial and commercial operations such as wastewater treatment plants, sanitary landfills, petroleum refineries, chemical factories, and paint and coating operations typically emit objectionable odors. The Air District has not identified solar arrays as sources of objectionable odors. Nor does use of the helipad involve other objectionable odors. Consistent with the approved project, the modified project would not have the potential to expose nearby sensitive receptors (i.e., residential areas) to objectionable odors. **[Same Impact as the Approved Project (Less than Significant Impact)]**

3.3.4 Conclusion

As documented above, the modified project would not result in new or substantially more severe significant air quality impacts than disclosed in the 2004 FEIR. Consistent with the 2004 FEIR, the modified project would implement Mitigation Measure AQ-1 to further reduce air quality impacts.

3.4 Biological Resources

The following discussion is based, in part, on an Assessment of Helipad Use Impacts on Birds completed by H.T. Harvey & Associates, Inc. dated June 14, 2026. This report is included as Appendix D to this Addendum.

3.4.1 Environmental Setting and Regulatory Setting Updates

The approved project consisted of replacing an existing hospital with a new hospital building and medical office building. Additionally, the approved project required the removal of 88 protected trees and was conditioned to replace trees in accordance with the City's Tree and Vegetation Ordinance. The approved project was constructed in 2011 and has since been operational.

3.4.2 2004 FEIR Biological Resources Findings

The 2004 FEIR concluded that the approved project would result in less than significant impacts with the implementation of the following mitigation measures:

- **Mitigation Measure BR -1.1:** Replace loss of Protected Trees. The Project sponsor shall submit an application to the City of Burlingame' s Parks and Recreation Department Director for a tree removal permit and meet the replacement requirements of the Tree and Vegetation Ordinance (Municipal Code, Title 11. 06.020). Included with the permit application shall be a landscaping plan that illustrates species, numbers, and sizes of replacement trees.
- **Mitigation Measure BR -1.2:** Maintain and protect trees to be retained. The Project sponsor shall be responsible for maintaining and protecting the existing on- site trees to be retained. The following specific actions shall be followed to maintain the health of the remaining trees:
    a. Any pruning shall be done according to the direction of a certified arborist and all pruning shall comply with International Society of Arboriculture, Western Chapter Standards or other comparable standards deemed acceptable to the City Arborist.
    b. Any abandoned utility lines (water, electrical, etc.) in the root zones radius of ten times the trunk diameter) shall be cut and left in the ground to the satisfaction of the City Arborist.
    c. Any surfacing material inside the root zone shall be pervious and installed on top of the existing grade. As an example, pervious pavers are acceptable provided the base material is also sufficiently pervious. Base rock containing granite fines is not sufficiently pervious.
    d. Temporary construction fencing shall be erected to protect the retained trees of a size to be established by the City Arborist. The fencing shall be placed at the perimeter of the root zone unless the pavement is supervised by a certified arborist. The fencing shall be in place prior to the arrival of construction materials or equipment.

e. The landscape irrigation shall be designed to prevent trenching inside the root zones of retained trees.
f. Supplemental irrigation shall be provided during construction. Approximately 10 gallons of water for each inch of trunk diameter should be applied at or near the perimeter of the root zone every two weeks during the dry months (any month receiving less than 1 inch of rainfall on average).
g. Retained trees shall be thoroughly mulched with a 3 -inch layer of bark chips with the exception of a 6- to 12 -inch area around the base of the root collar, which must be left bare and dry.

- **Mitigation Measure BR -2.1:** Conduct pre -construction surveys for nesting birds and implement protective measures if identified. The removal of trees, shrubs, or weedy vegetation shall be avoided during the February 1 through August 31 bird nesting period to the extent possible. If no vegetation or tree removal is proposed during the nesting period, no surveys shall be required. If it is not feasible to avoid the nesting period, a survey for nesting birds shall be conducted by a qualified wildlife biologist no sooner than 14 days prior to the start of removal of trees, shrubs, grassland vegetation, buildings, grading, or other construction activity. Survey results shall be valid for 21 days following the survey; therefore, if vegetation or building removal is not started within 21 days of the survey, another survey shall be required. The area surveyed shall include all construction sites, access roads, and staging areas, as well as areas within 150 feet outside the boundaries of the areas to be cleared or as otherwise determined by the biologist. In the event that an active nest is discovered in the areas to be cleared, or in other habitats within 150 feet of construction boundaries, clearing and construction shall be postponed for at least two weeks or until a wildlife biologist has determined that the young have fledged (left the nest), the nest is vacated, and there is no evidence of second nesting attempts.

3.4.3 Analysis of Modified Project

3.4.3.1 *Substantial Adverse Effects on Candidate, Sensitive, or Special-Status Species*

The modified project would remove 121 non-protected trees that could support nesting birds. Consistent with the approved project, the modified project would implement Mitigation Measure BR-2.1, ensuring avian nesting activity would not be disturbed by project construction. The solar arrays, once installed, would not inhibit nesting activity in future breeding seasons. In fact, the structure could attract birds for nesting and roosting. Further, the modified project would not pose a risk due to bird collisions, since the greatest risk of avian collisions occurs in the area within 40–60 feet of the ground, because this is the area in which most bird activity occurs.[22,23] **[Same Impact as the Approved Project (Less than Significant Impact with Mitigation Incorporated)]**

[22] Sheppard, C. and G. Phillips. *Bird-Friendly Building Design, 2nd Ed. The Plains, VA: American Bird Conservancy*, 2015.
[23] San Francisco Planning Department. *Standards for Bird-Safe Buildings*. July 14, 2011.

3.4.3.2 *Substantial Adverse Effect on Riparian Habitat or Other Sensitive Natural Community*

According to the 2004 FEIR, the project site does not support riparian habitat or sensitive natural communities. **[Same Impact as the Approved Project (Less than Significant Impact)]**

3.4.3.3 *Substantial Adverse Effect on State or Federally Protected Wetlands*

According to the 2004 FEIR, the project site does not support federally protected wetlands. **[Same Impact as the Approved Project (Less than Significant Impact)]**

3.4.3.4 *Interfere Substantially with the Movement of Any Native Resident or Migratory Fish or Wildlife Species*

Wildlife corridors in Burlingame include creek or stream channels and associated riparian vegetation, canyons, and the bay shoreline. The 2004 FEIR concluded that the project site did not support sensitive habitat or species. To account for the observed usage of the helipad and the removal of CUP Condition of Approval 45 purporting to limit usage, an assessment (see Appendix D) was completed by a qualified biologist at H.T. Harvey & Associates that considered potential flight paths of birds in the project vicinity and assessed the potential effects of helicopter flights to and from Mills Peninsula Medical Center on birds.

The Mills Peninsula Medical Center and surrounding area are heavily urbanized. As a result, relatively few bird species are expected to occur in the vicinity, and such species would occur in low abundance. The majority of bird species occurring in the project vicinity at any time of year are common, widespread, urban-adapted species. Even during migration, no sensitive or special-status bird species are expected to occur in the project vicinity.

As helicopters fly to and from the helipad at Mills Peninsula Medical Center, the noise and movement of the helicopters are expected to disturb birds in the vicinity to some extent. Such noise may temporarily disrupt birds' foraging, resting, nest-building, and other behaviors. However, such impacts would be temporary and short-term, occurring primarily when a helicopter first appears, and bird behavior would return to normal quickly. Given the high levels of noise and human activity from traffic, residential activities, schools, railyards, and other land uses in the immediate vicinity of the helipad, birds in the project vicinity are already habituated to such disturbance to the point that no birds are expected to permanently leave the area, abandon their nests, or suffer injury or mortality as a result of the disturbance. Further, birds would be able to see and hear the helicopter approaching from a distance and move out of the way so that no injury or mortality associated with collision with the helicopter would occur.

Use of the helipad by 117 annual helicopter visits would have greater disturbance on nesting, foraging, roosting, and resting birds than the six helicopter visits per year evaluated for the certified EIR. However, such disturbance would be short-term; would not result in substantial changes in bird

behavior (e.g., sufficient to cause the abandonment of active bird nests); would affect low numbers of bird species and individuals, given the low bird diversity and abundance in the project vicinity; and would primarily affect species that are common and widespread. As a result, the increased number of helicopter visits would not have any measurable effect on regional populations of any bird species, or on the diversity of the bird community in the project vicinity. Such an impact would therefore be less than significant. **[Same Impact as the Approved Project (Less than Significant Impact)]**

3.4.3.5 *Conflict with Local Policies or Ordinances Protecting Biological Resources*

The modified project would remove 121 non-protected trees, with no tree removal permits required and would therefore not conflict with the City's Urban Reforestation and Tree Protection Ordinance. Consistent with the approved project, the modified project would be required to implement Mitigation Measure BR-1.2, which requires maintaining and protecting on-site trees that would be retained. While the project would remove non-protected trees from the site, these trees were planted as a result of the approved project and were not trees that existed prior to the 2004 FEIR. **[Same Impact as the Approved Project (Less than Significant Impact with Mitigation Incorporated)]**

3.4.3.6 *Conflict with the Provisions of an Adopted Habitat Conservation Plan, Natural Community Conservation Plan, or Other Approved Local, Regional, or State Habitat Conservation Plan*

The project site is not located in an adopted Habitat Conservation Plan or Natural Community Conservation Plan. **[Same Impact as the Approved Project (No Impact)]**

3.4.4 Conclusion

As documented above, the modified project would not result in new or substantially more severe significant impacts biological resources than disclosed in the 2004 FEIR. Consistent with the 2004 FEIR, the modified project would implement Mitigation Measure BR-2.1, ensuring avian nesting activity would not be disturbed by project construction. Consistent with the 2004 FEIR, the modified project would be required to implement Mitigation Measure BR-1.2, which requires maintaining and protecting on-site trees that would be retained.

3.5 Noise

The following discussion is based, in part, on a Helicopter Noise Analysis completed by Shen Milsom Wilke (SM&W) dated April 21, 2025 and a peer review completed by Illingworth & Rodkin, Inc. dated January 27, 2026. These reports are included as Appendix B and Appendix C, respectively, to this Addendum.

3.5.1 Environmental Setting and Regulatory Setting Updates

The approved project consisted of replacing an existing hospital with a new hospital building and medical office building. The approved project was constructed in 2011 and has since been operational.

As discussed in Section 2.3.1, the FEIR assumed and evaluated up to six helicopter trips per year. However, since installation of the helipad at its current location, the hospital averages between 79 and 117 trips per year. In addition, the flight approaches identified in the Heliport Permit differ from what was evaluated in the FEIR. The use of the helipad is regulated by Caltrans, Division of Aeronautics pursuant to a heliport permit which is not regulated or enforced by the City. Since the City does not regulate the number of helicopter trips per year pursuant to this permit, nor the flight approaches regulated by the FAA, the proposed project will remove the CUP Condition of Approval 45 which attempts to do so. Accordingly, the potential noise impacts associated with the existing helipad operations are evaluated below.

3.5.2 2004 FEIR Noise Findings

The 2004 FEIR found that construction vibration, mechanical noise, parking noise, and helicopter operational noise would be less than significant. The 2004 FEIR concluded that construction noise impacts would be significant and unavoidable after implementation of the following mitigation measures:

- **Mitigation Measure NO-1.1:** Implement best management practices to reduce construction noise. The project sponsor shall incorporate the following practices into the construction documents to be implemented by the project contract, and these practices shall be provided to the City Planner for approval prior to the issuance of building permits.
    a. 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 movement of equipment.

b. Use quiet construction equipment whenever possible.
c. 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 equipment. Other quieter procedures, such as drilling rather than using impact equipment, shall be used whenever feasible.
d. Prohibit unnecessary idling of internal combustion engine.
e. Select routes for movement of construction-related vehicles and equipment in conjunction with the Burlingame Planning Department so that noise sensitive areas, including residences, hotels, and outdoor recreation areas, are avoided as much as possible. Include these routes in materials submitted to the City Planner for approval prior to the issuance of building permits.
f. Designate a noise disturbance coordinator who will be responsible for responding to complaints about noise during construction. The telephone number of the noise disturbance coordinator shall be conspicuously posted at the construction site and shall be provided to the Burlingame Planning Director. Copies of the construction schedule shall be posted at nearby sensitive areas.

3.5.3 Analysis of Modified Project

3.5.3.1 *Substantial Increase in Ambient Noise Levels*

In accordance with the City's Noise Element, residential and hospital noise levels are considered satisfactory with a Community Noise Equivalent Level (CNEL)[24] of less than 60 dBA, while noise environments between 60 dBA and 70 dBA CNEL are considered conditionally acceptable, and noise environments between 70 and 80 dBA CNEL are considered normally unacceptable.[25]

Construction

Construction of the modified project would occur over a period of 21 weeks. Construction of the project would result in temporary increases in ambient noise levels. In accordance with the 2004 FEIR, the modified project would implement Mitigation Measure NO-1.1 to reduce construction noise. Additionally, construction of the project would occur in accordance with the time limits established by the City of Burlingame's Noise Ordinance.[26] **[Same Impact as the Approved Project (Less than Significant Impact with Mitigation Incorporated)]**

[24] The Community Noise Equivalent Level (CNEL) is a 24-hour weighted average sound measurement used in California to assess noise, particularly for airports.

[25] City of Burlingame. *Draft Environmental Impact Report for the Peninsula Hospital Replacement Project*. January 21, 2004. SCH # 2003072005. Page 3.5-6.

[26] Section 10.40.037 of the Noise Ordinance establishes that noise levels generated by construction are prohibited between the hours of 8:00 p.m. and 7:00 a.m. Monday through Saturday and between the hours of 6:00 p.m. and 10:00 a.m. Sundays and holidays.

Operation

Solar Arrays

The modified project consists of modifications to an existing medical center that has been in operation since 2011. Therefore, the operational noise associated with the medical center has already been accounted for in the 2004 FEIR, and has become part of the existing environmental setting. The proposed PV solar power arrays would result in negligible ambient noise level increases, since the panels have minimal moving parts. The only moving parts are the small cooling fans within the electronics. The cooling fans have a rated noise level of 60 Decibels at a distance of one meter. This level of noise is comparable to the sound of a residential air conditional unit and would be less than significant. The modified project would not result in additional employment or patient levels, nor additional vehicle trips to the site, therefore roadway noise would be unaffected.

Helipad Usage

The existing helipad is regulated by CalTrans under a heliport permit and state and federal law generally preempt the City from regulating emergency helicopter trips. The modified project would amend the CUP to remove unenforceable Condition of Approval # 45, which regulates the number of helipad trips up to 24 trips per year.

The 2004 FEIR did not evaluate the amount of helicopter flights that have occurred since the 2011 implementation of the approved project. The 2004 FEIR assumed that the helipad would have a maximum of six flights per year and that all relevant noise thresholds would be met at the neighboring residential parcels. The 2004 FEIR utilized a 60 dBA CNEL criteria when considering noise impacts from the annual average helipad operations. This threshold is more conservative than the FAA's adopted threshold of 65 dBA CNEL for significant noise exposure.

The hospital averages between 79 and 117 trips per year. In order to assess noise levels associated with the helipad usage, updated noise modeling was completed (refer to Appendix B). In accordance with the FAA, the modeling assumed an annualized maximum observed case of 0.32 flights per day (refer to Appendix B). The results of the modeling predicted that annualized maximum observed-case helicopter noise would be below 60 dBA CNEL threshold at all residential areas.

Approximately 25 percent of the flight operations at the helipad occur on days when two or more flights occur. In order to assess noise exposure to area residents when two flights occur per day, Illingworth & Rodkin, Inc. completed supplemental noise modeling for the two flights per day scenario (refer to Appendix C). Based on the 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. It was determined that the use of the 65 dBA CNEL standard, as prescribed in City General Plan Policy CS-4.8, would be reasonable for use in determining the compatibility of the surrounding land uses with noise resulting from two flights per day.[27] Further, in the event that flights deviated to the west of the designated flight paths shown on Figure 2.3-2,

[27] General Plan Policy CS-4.8 considers land uses compatible with aircraft noise of 65 dBA CNEL or less.

the supplemental modeling found that 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, and that noise levels resulting from two flights per day at the facility would only exceed 65 dBA CNEL at the nursing home to the northwest of the helipad. Based on the above, noise impacts from the helipad usage are less than significant, consistent with the findings of the 2004 FEIR and, therefore, the modified project would not result in a new significant noise impact or substantially more severe noise impacts than disclosed in the 2004 FEIR.. **[Same Impact as the Approved Project (Less than Significant Impact)]**

3.5.3.2 *Groundborne Vibration*

The 2004 FEIR concluded that construction vibration levels would not exceed the 0.2 in/sec vibration significant criterion. The 2004 FEIR found vibration levels from construction equipment would range from 0.003 to 0.0089 at a distance of 25 feet. The modified project would remove trees and install eight solar arrays, neither of which would involve substantial construction activity (e.g. building demolition, significant grading, pile driving, etc.) involving equipment that would generate significant vibration levels. The nearest residences to the project site are located more than 25 feet away and would therefore not be exposed to vibration levels from construction of the modified project in excess of the 0.2 in/sec vibration significant criterion. For these reasons, the modified project would not result in new significant or substantially more severe vibration impacts than disclosed in the 2004 FEIR. **[Same Impact as the Approved Project (Less than Significant Impact)]**

3.5.3.3 *Expose People to Excessive Noise Levels from Airport Operations*

The project site is located within the airport land use plan for the San Francisco International Airport. The site does not fall within the 60 dB CNEL contours. The 2004 FEIR concluded that the approved project would not expose people residing or working in the project area to excessive noise levels. The proposed modified project would continue to not be located within the 60 dB CNEL contours. For these reasons, the modified project would not result in a new or more severe impact than disclosed in the 2004 FEIR for the approved project. **[Same Impact as the Approved Project (Less than Significant Impact)]**

3.5.4 Conclusions

As documented above, the modified project, with adherence to Mitigation Measure NO-1.1 identified in the 2004 FEIR, would not result in new or substantially more severe significant noise and vibration impacts than disclosed in the 2004 FEIR.

Section 4.0 Conclusion

The modified project proposes to construct eight carport-style solar modules in the surface parking lot of the existing Mills-Peninsula Medical Center, remove 121 non-protected trees from the site, and remove CUP Condition of Approval 45. Based on the above analysis of the modified project, no substantive revisions are needed to the 2004 FEIR because none of the criteria listed in CEQA Guidelines Section 15162 have occurred. Specifically, based on the above analysis:

- The modified project would make no substantial changes to the project that would require major revisions of the 2004 FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- There are no substantial changes with respect to the circumstances under which the modified project would be undertaken that would require major revisions to the 2004 FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; and
- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the 2004 FEIR was certified as complete, that shows any of the following:
    - The modified project would have one or more significant effects not discussed in the 2004 FEIR;
    - Significant effects previously examined would be substantially more severe than shown in the 2004 FEIR;
    - Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the modified project, but the project proponents decline to adopt the mitigation measure or alternative; or
    - Mitigation measures or alternatives which are considerably different from those analyzed in the 2004 FEIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Therefore, pursuant to State CEQA Guidelines Section 15164, an Addendum has appropriately been prepared.

Section 5.0 References

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Section 6.0 Lead Agency and Consultants

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