



Burlingame Housing Element Update

Addendum to the Burlingame General Plan
Environmental Impact Report
(SCH No. 2017082018)

prepared by

City of Burlingame
Community Development Department
501 Primrose Road
Burlingame, California 94010
Contact: Kevin Gardiner, Community Development Director

prepared with the assistance of

Rincon Consultants, Inc.
449 15th Street, Suite 303
Oakland, California 94612

November 2023



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Environmental Scientists | Planners | Engineers

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1 Introduction

This document is an Addendum to the Environmental Impact Report (EIR) (State Clearinghouse [SCH] #2017082018) for the 2040 Burlingame General Plan, which was certified in 2019 (“2019 EIR” or “certified EIR”). This Addendum is being prepared for the City’s 2023-2031 Housing Element Update (HEU), henceforth known as the “proposed project” or “proposed HEU.” The City of Burlingame was the lead agency for the certified EIR and is the lead agency for this Addendum. The Addendum analyzes the environmental effects of proposed revisions (due to the proposed HEU) to the previously approved project analyzed in the certified EIR. This Addendum has been prepared in accordance with relevant provisions of the California Environmental Quality Act (CEQA) of 1970 (as amended) and the CEQA Guidelines.

According to Section 15164 of CEQA Guidelines, an Addendum to a previously certified EIR is the appropriate environmental document in instances when “only minor technical changes or additions are necessary” and when the new information does not involve new significant environmental effects or a substantial increase in the severity of a significant effect beyond those identified in the previous EIR. CEQA Guidelines Section 15164 states the following:

- a. The lead agency or 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 Section 15162 calling for preparation of a subsequent EIR have occurred [these are listed below in Section 1.2].
- b. [Omitted – applies to Negative Declarations]
- c. An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- d. The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- e. A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency’s findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

2 Background

This section provides an overview of the Burlingame 2040 General Plan and its certified EIR to provide context for this Addendum.

2019 EIR Background

The City of Burlingame certified the 2040 General Plan EIR (State Clearinghouse #2017082018) on January 1, 2019. The program-level EIR analyzed the potential environmental impacts of implementing the 2040 General Plan. The 2019 EIR analyzed a maximum buildout associated with implementation of the General Plan of 2,951 net new housing units and 6,876 net new residents. The City also prepared and adopted a Mitigation, Monitoring and Reporting Program (MMRP); CEQA findings; and a Statement of Overriding Considerations in 2019.

Basis for the Addendum

This Addendum analyzes the proposed HEU's impacts in relation to those identified from the 2040 General Plan buildout in the certified EIR. As discussed in the CEQA Guidelines, between the date an environmental document for a project is completed and the date that project is fully implemented, one or more of the following changes may occur: 1) the project may change; 2) the environmental setting of the project may change; or 3) previously unknown information can arise. Before proceeding with a project, CEQA requires the lead agency to evaluate these changes to determine whether they affect the conclusions in the prior environmental document. When an EIR has been adopted and a project is modified or otherwise changed after adoption, additional CEQA review may be necessary. The key considerations in determining the need for the appropriate type of additional CEQA review are outlined in Public Resources Code Section 21166 (CEQA) and CEQA Guidelines Sections 15162 and 15164.

CEQA Guidelines Section 15162(a) provides that a Subsequent EIR is not required unless the following occurs:

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 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 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.

Pursuant to CEQA Guidelines Section 15164(a), an Addendum to a previously certified EIR may be prepared if some changes or additions are necessary but none of the conditions described in Section 15162 have occurred that require preparation of a Subsequent EIR. An Addendum must include a brief explanation of the agency's decision not to prepare a Subsequent EIR and must be supported by substantial evidence in the record as a whole (Section 15164[e]). The decision-making body must consider the Addendum prior to approving the project (Section 15164[d]).

An addendum to the 2019 EIR is appropriate to address the proposed project, because the proposed modifications to the 2040 General Plan do not meet the conditions of Section 15162(a) for preparation of a Subsequent EIR as described herein.

This Addendum presents an analysis of the environmental topics identified in Appendix G of the CEQA Guidelines, using a modified checklist that determines for each topic whether the circumstances set forth in Public Resources Code Section 21166 (and its implementing CEQA Guidelines sections 15162 and 15163) are present with respect to the proposed project or the circumstances surrounding the proposed project.

The certified EIR and this Addendum serve as documents to inform decision-makers and the public of the potential environmental consequences of approving the proposed project. This Addendum neither controls nor determines the ultimate decision for approval of the proposed project. The information presented in this Addendum to the certified EIR will be considered by the City of Burlingame alongside the certified EIR prior to deciding whether to approve the proposed project.

3 Project Description

The proposed HEU would amend the City of Burlingame’s 2040 General Plan by updating the current Housing Element with the proposed 2023-2031 Housing Element and amending the 2040 General Plan and Burlingame Municipal Code (BMC) as needed for consistency and HEU implementation.

The proposed HEU establishes programs, policies, and actions to further the goal of accommodating projected housing demand, as mandated by the State; increasing housing production to meet this demand; improving housing affordability; preserving existing affordable housing; improving the safety, quality and condition of existing housing; facilitating the development of housing for all income levels and household types, including special needs populations; improving the livability and economic prosperity of all Burlingame residents; and promoting fair housing choice for all. This section describes the proposed project, including the project location, major project characteristics, project objectives, and discretionary actions needed for approval.

Lead Agency Name, Address, and Contact

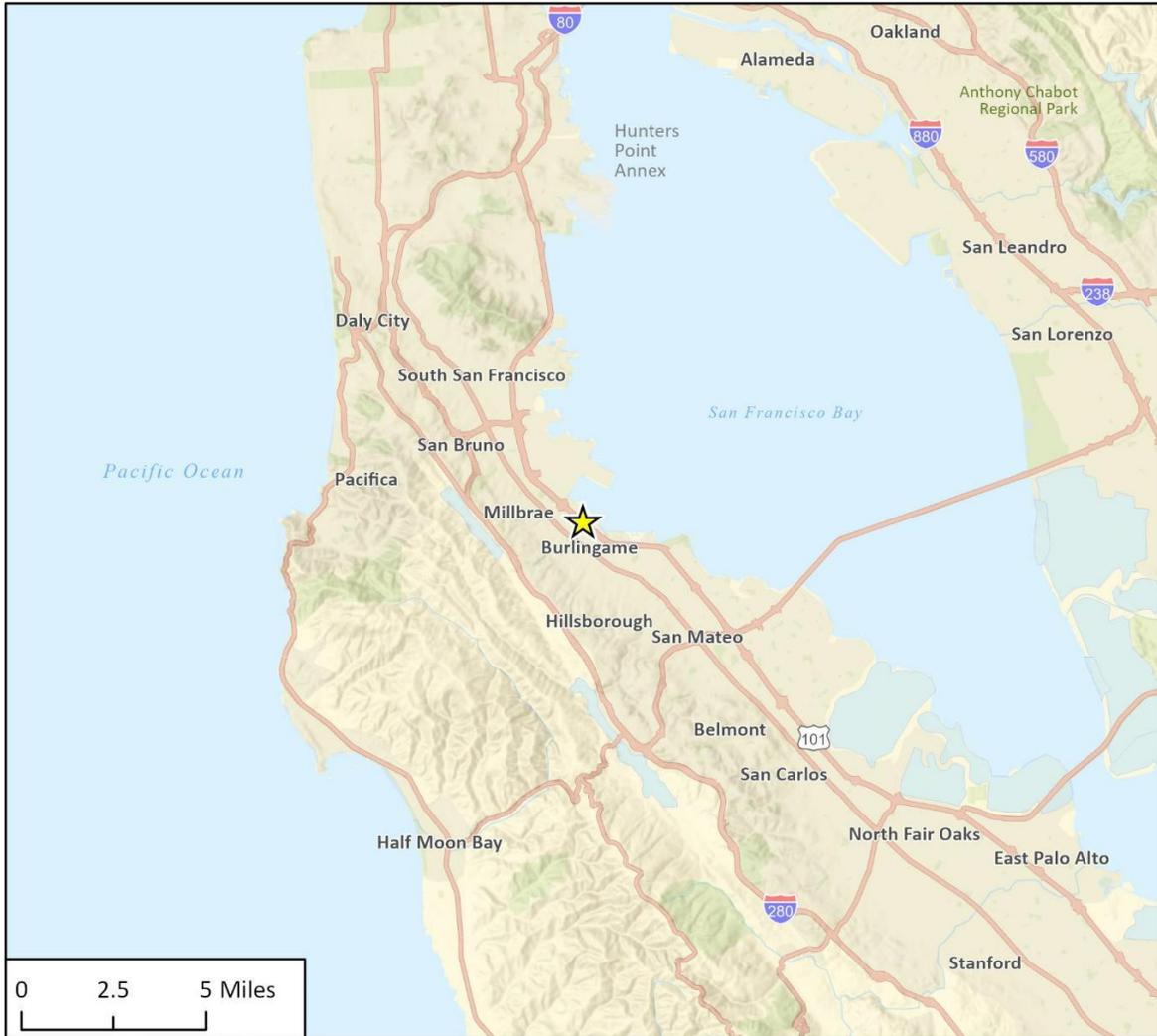
City of Burlingame
501 Primrose Road
Burlingame, California 94010

Contact: Kevin Gardiner, Community Development Director, kgardiner@burlingame.org, 650-558-7253

Project Location

The study area considered in this analysis includes the entire city of Burlingame (hereinafter referred to as “City” or “Burlingame”). Burlingame is located on the San Francisco Bay Peninsula approximately 10 miles south of San Francisco and 30 miles northwest of San Jose. Burlingame encompasses an area of approximately 5.5 square miles (County of San Mateo 2023). The regional location of Burlingame is shown in Figure 1 and the city limits are show in Figure 2.

Figure 1 Regional Location



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Fig. 1 Regional Location

★ Project Location

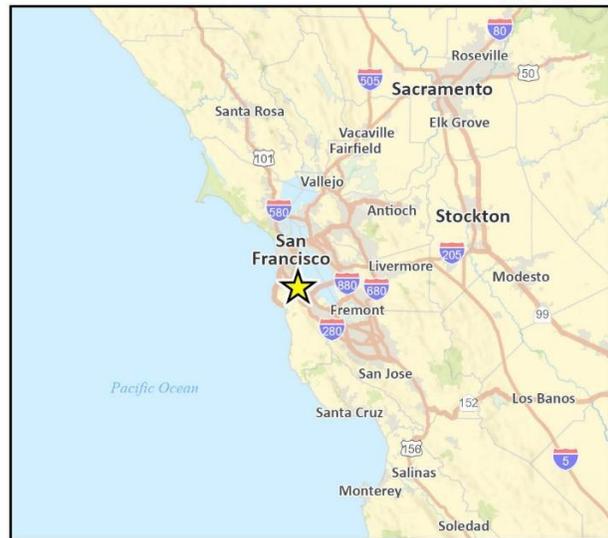
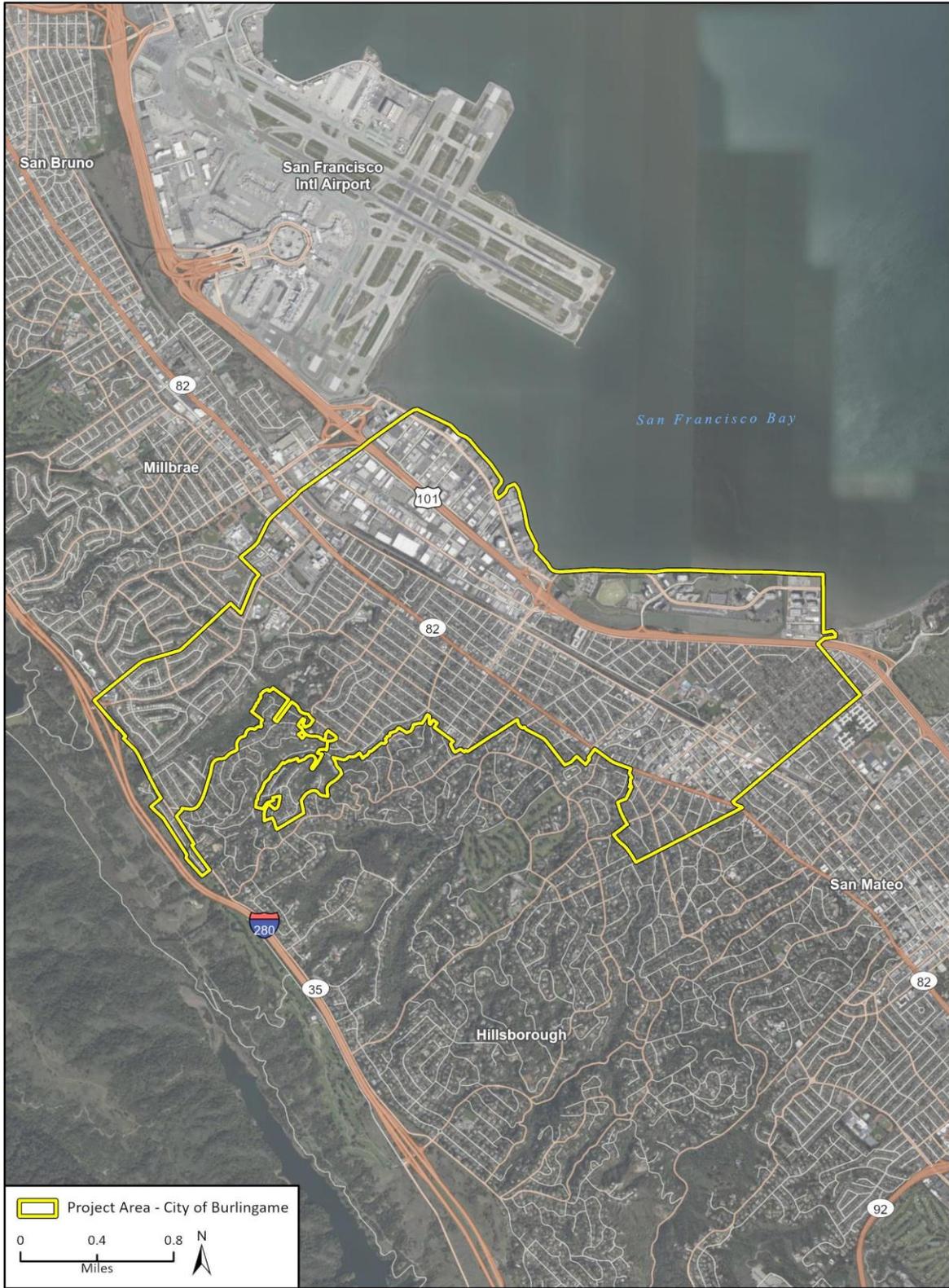


Figure 2 City of Burlingame Location



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Fig 2 Project Location

Existing Setting

Land uses within Burlingame include primarily single-family residential uses and multi-family residential uses, as well as schools, civic buildings, parks and open space, and commercial uses (City of Burlingame 2019). The developable area within Burlingame, located between the Junipero Serra Freeway (Interstate 280) and the Bayshore Freeway (US 101), is largely built out. The housing stock of Burlingame in 2022 was made up of 6,336 single-family detached residences, 581 single-family attached residences, 898 multi-family residences with 2 to 4 units, 5,366 multi-family residences with 5 or more units, and 13 mobile homes (California Department of Finance [DOF] 2022). More than three-quarters of the city's housing stock is over 50 years old, but most residential units remain well maintained as exemplified by the number of building permits issued for improvements during the previous planning period.

Housing Element Update

The proposed project consists of a complete update to the Housing Element of the General Plan. The updates are intended to enable Burlingame to accommodate housing in accordance with State law while continuing to provide services, parks, schools, and offering new programs that support the city's diversity and housing affordability.

The Housing Element is one of the State-mandated elements of the General Plan. The current Housing Element was adopted in 2015. The Housing Element identifies Burlingame's housing conditions and needs, and establishes the goals, objectives, and policies that comprise the City's housing strategy to accommodate projected housing needs, including the provision of adequate housing for low-income households and for special-needs populations (e.g., unhoused people, seniors, single-parent households, large families, and persons with disabilities).

The proposed HEU would bring the element into compliance with State legislation passed since adoption of the 2015-2023 Housing Element and with the current Regional Housing Needs Allocation (RHNA). In December 2021, the Association of Bay Area Governments (ABAG) Executive Board adopted the 6th Cycle Final RHNA, which includes a "fair share" allocation for meeting regional housing needs for each community in the ABAG region.

The proposed HEU includes the following components, as required by State law:

- **Evaluation of the 2015-2023 Housing Element:** An evaluation of the results of the goals, policies, and programs adopted in the 2015-2023 Housing Element that compares projected outcomes with actual achieved results.
- **Demographics and Housing Needs Assessment:** An analysis of the existing and projected housing needs of the community. It provides a profile of socio-demographic information, such as population characteristics, household information, housing stock, tenure, and housing affordability. The assessment also considers local special housing needs, such as seniors, farmworkers, unhoused persons, large households, and female-headed households.
- **Housing Capacity Analysis and Methodology:** An inventory listing adequate sites that are suitably zoned and available within the planning period to meet the city's fair share of regional housing needs across all income levels.
- **Housing Resources:** An identification of resources to support the development, preservation, and rehabilitation of housing.

- **Constraints to Housing Production:** An assessment of impediments to housing production across all income levels covering both governmental (e.g., zoning, fees, etc.) and nongovernmental (e.g., market, environmental, etc.) impediments.
- **Affirmatively Furthering Fair Housing:** An evaluation and policy framework for expanding opportunities and removing constraints to providing housing for disadvantaged households.
- **Community Outreach and Engagement:** An overview of the community engagement that informed the Housing Element goals, policies, and programs.
- **Housing Plan:** This section provides a statement of the community’s goals, policies, and quantified objectives to maintain, preserve, improve, and develop housing, provide zoning for a variety of housing types, as well as a schedule of implementable actions to be taken during the planning period. Quantified objectives are included to make sure that both the existing and the projected housing needs are met, consistent with the City’s share of the RHNA. Some of the primary goals, policies, and programs of the HEU include the following: achieving increased affordability and diversity of housing; providing affirmatively fair housing; providing housing opportunities for City employees, teachers, hospital workers, and others in the service industry; and preserving the City’s “naturally affordable” housing stock. The goals, policies, and programs in the HEU would not result in physical impacts on the environment, beyond the potential growth in population that would be accommodated by additional residential development. For that reason, the focus of this analysis is on the physical impacts on the environment due to additional growth. In other words, implementation of the HEU goals, policies, and programs would not result in CEQA impacts.

The Draft Housing Element is available on the City’s website:

<https://www.burlingame.org/housingelement>

Regional Housing Needs Allocation

The Housing Element must address the City's fair share of the regional housing need and specific State statutory requirements and must reflect the vision and priorities of the local community. ABAG has allocated the region’s 441,176 housing unit growth needs among each city and county in its region through a process called the Regional Housing Needs Determination. From the determination, ABAG assigns each jurisdiction a Regional Housing Needs Allocation (RHNA). The RHNA represents the minimum number of housing units that the City is required to plan for in its Housing Element by providing adequate sites through the General Plan and zoning. As shown in Table 1, Burlingame’s RHNA for the 2023-2031 planning period is 3,257 units distributed among four income categories.

Table 1 RHNA Allocation and Percentage of Income Distribution for Burlingame

Income Level	Percent of Area Median Income (AMI)	Units	Percent
Very Low	<50%	863	26.5%
Low	50-80%	497	15.25%
Moderate	80-120%	529	16.25%
Above Moderate	>120%	1,368	42.0%
Total		3,257	100%

Source: Association of Bay Area Governments Methodology and numbers were approved by ABAG’s Executive board on January 21, 2021 (Resolution No. 02-2021).

Meeting the RHNA

To meet the RHNA and provide sufficient capacity to accommodate future housing development, the HEU specifies sites suitable for residential development, and includes other goals, policies, and programs to encourage housing. However, the Housing Element in and of itself does not develop housing; it is a plan. This housing plan would be supported by existing zoning standards. Housing development is mainly accomplished by the private sector and dependent on factors independent of City control, such as financial resources. The sections below introduce the Sites Inventory, which are sites proposed to meet the RHNA.

The Department of Housing and Community Development (HCD) guidance is to identify enough housing sites inventory to not only cover the jurisdiction's RHNA, but to also provide for an additional buffer capacity to accommodate realistic production rates of affordable housing units. Having a surplus or buffer can also allow for instances when a smaller residential unit count may have to be considered for a given property. The "No Net Loss" Law (Government Code Section 65863) requires maintenance of sufficient sites to meet the RHNA for all income levels throughout the planning period.

Sites Inventory

The City assessed capacity to meet the RHNA by reviewing entitled and proposed development, accessory dwelling units (ADU), and underutilized sites. The housing projections utilize existing land use and zoning densities, and no rezoning would be necessary for the HEU. The City has identified 31 sites that could provide housing to meet the City's RHNA and buffer. These sites are detailed below in Table 2 and Figure 3, Figure 4, and Figure 5.

Table 2 Housing Inventory Sites

Address	APN	Acreage	General Plan Designation	Zoning Designation	Max Density	Unit Count
999 Howard Ave	029-234-020	0.86	DSP - Myrtle Road Mixed Use	MMU (Myrtle Mixed Use)	90	69
1100 Peninsula Ave	029-242-150	0.84	DSP - R-4 Incentive	R-4-I	90	67
925 Bayswater Avenue	029-244-060	1.39	DSP - Myrtle Road Mixed Use	MMU (Myrtle Mixed Use)	90	111
1500 Ralston Ave	028-285-290	0.54	Medium/High Density Residential	R-3	50	27
501 Primrose Road	029-112-400	1.14	High Density Residential	R-4	26	30
1810 El Camino Real	025-150-090	0.57	North Burlingame Mixed Use	NBMU (North Burlingame Mixed Use)	140	77
1838 El Camino Real	025-150-200	0.6	North Burlingame Mixed Use	NBMU (North Burlingame Mixed Use)	140	81
1764 Marco Polo Way	025-144-080	1.15	North Burlingame Mixed Use	NBMU (North Burlingame Mixed Use)	140	155
1800 Magnolia Ave	025-122-090	0.98	North Burlingame Mixed Use	NBMU (North Burlingame Mixed Use)	140	91
1841 El Camino Real	025-122-140	2.21	North Burlingame Mixed Use	NBMU (North Burlingame Mixed Use)	140	205

City of Burlingame
Burlingame Housing Element Update

Address	APN	Acreage	General Plan Designation	Zoning Designation	Max Density	Unit Count
1845 El Camino Real	025-122-040	0.95	North Burlingame Mixed Use	NBMU (North Burlingame Mixed Use)	140	88
1850 Magnolia Ave	025-122-030	1.12	North Burlingame Mixed Use	NBMU (North Burlingame Mixed Use)	140	104
1871 El Camino Real	025-122-020	1.24	North Burlingame Mixed Use	NBMU (North Burlingame Mixed Use)	140	115
1887 El Camino Real	025-122-010	0.81	North Burlingame Mixed Use	NBMU (North Burlingame Mixed Use)	140	75
1626 Rollins Rd	025-262-460	1.02	Live/Work	RRMU (Rollins Road Mixed Use)	70	71
1634 Rollins Rd	025-262-420	1.02	Live/Work	RRMU (Rollins Road Mixed Use)	70	71
1655 Rollins Rd	025-280-420	3.71	Live/Work	RRMU (Rollins Road Mixed Use)	70	259
1744 Rollins Rd	025-169-290	1.52	Live/Work	RRMU (Rollins Road Mixed Use)	70	105
1675 Rollins Rd	025-280-210	1.38	Live/Work	RRMU (Rollins Road Mixed Use)	70	96
2 Adrian Ct	025-169-120	1.96	Live/Work	RRMU (Rollins Road Mixed Use)	70	136
50 Adrian Ct	025-169-070	2.65	Live/Work	RRMU (Rollins Road Mixed Use)	70	185
40 Broderick Rd	025-166-100	1.46	Live/Work	RRMU (Rollins Road Mixed Use)	70	102
50 Broderick Rd	025-166-110	1.97	Live/Work	RRMU (Rollins Road Mixed Use)	70	138
11 Guittard Rd	025-166-210	1.28	Live/Work	RRMU (Rollins Road Mixed Use)	70	88
25 Ingold Rd	025-280-080	0.96	Live/Work	RRMU (Rollins Road Mixed Use)	70	67
35 Ingold Rd	025-280-200	2.6	Live/Work	RRMU (Rollins Road Mixed Use)	70	181

Source: City of Burlingame, 2023

Pipeline Projects

Projects that have been approved, permitted, or received a certificate of occupancy since the beginning of the RHNA projected period may be credited toward meeting the City’s RHNA for the 6th cycle Housing Element, provided it can be demonstrated that the units will be built during the planning period. The city has identified 26 projects that are entitled or under review. Pipeline projects would generate 2,808 new units within the city.

Accessory Dwelling Units

ADUs, also referred to as granny flats or secondary units, provide an affordable housing option and are an important tool to help meet the housing needs in communities. The ADUs can also be credited towards RHNA. The City anticipates that it will permit an average of 21 accessory dwelling units (ADU)

per year or 167 units during the eight-year planning period. The 21-unit annual projection is based on the City's average ADU production from 2020-2021.

Key Vacant and Nonvacant Sites

The majority of identified sites are nonvacant, with nonvacant sites accommodating more than 50 percent of the lower income units. However, the City has determined that this would not be an impediment to development as the type of sites used for the inventory are consistent with those that have been redeveloped into housing projects in recent years. The City has received several applications for projects that involved redeveloping underutilized low-density commercial property into either full housing or mixed-use housing projects.

Figure 3 Housing Element Update Sites Inventory Locations

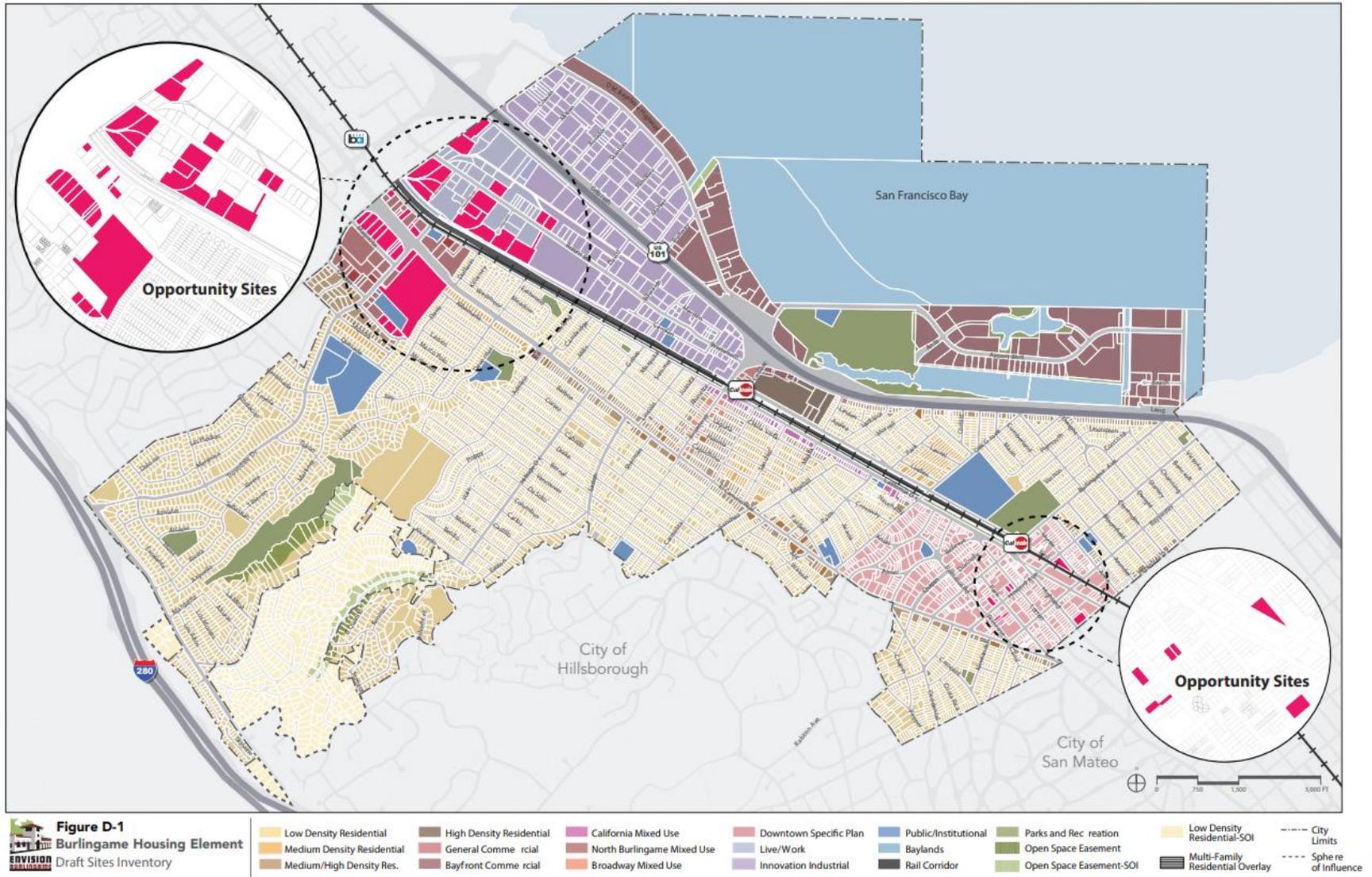


Figure 4 Opportunity Sites Map – Downtown Burlingame

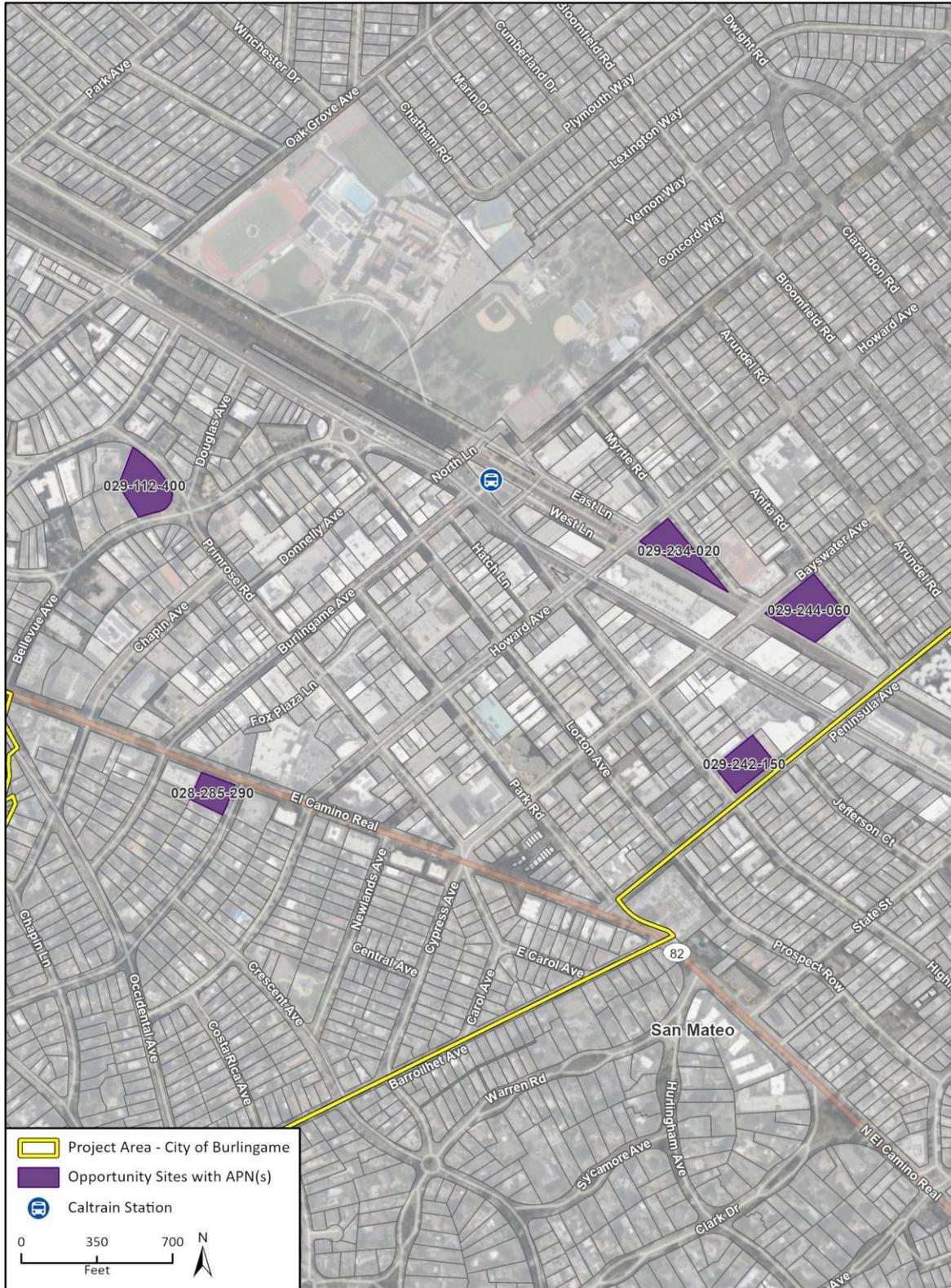
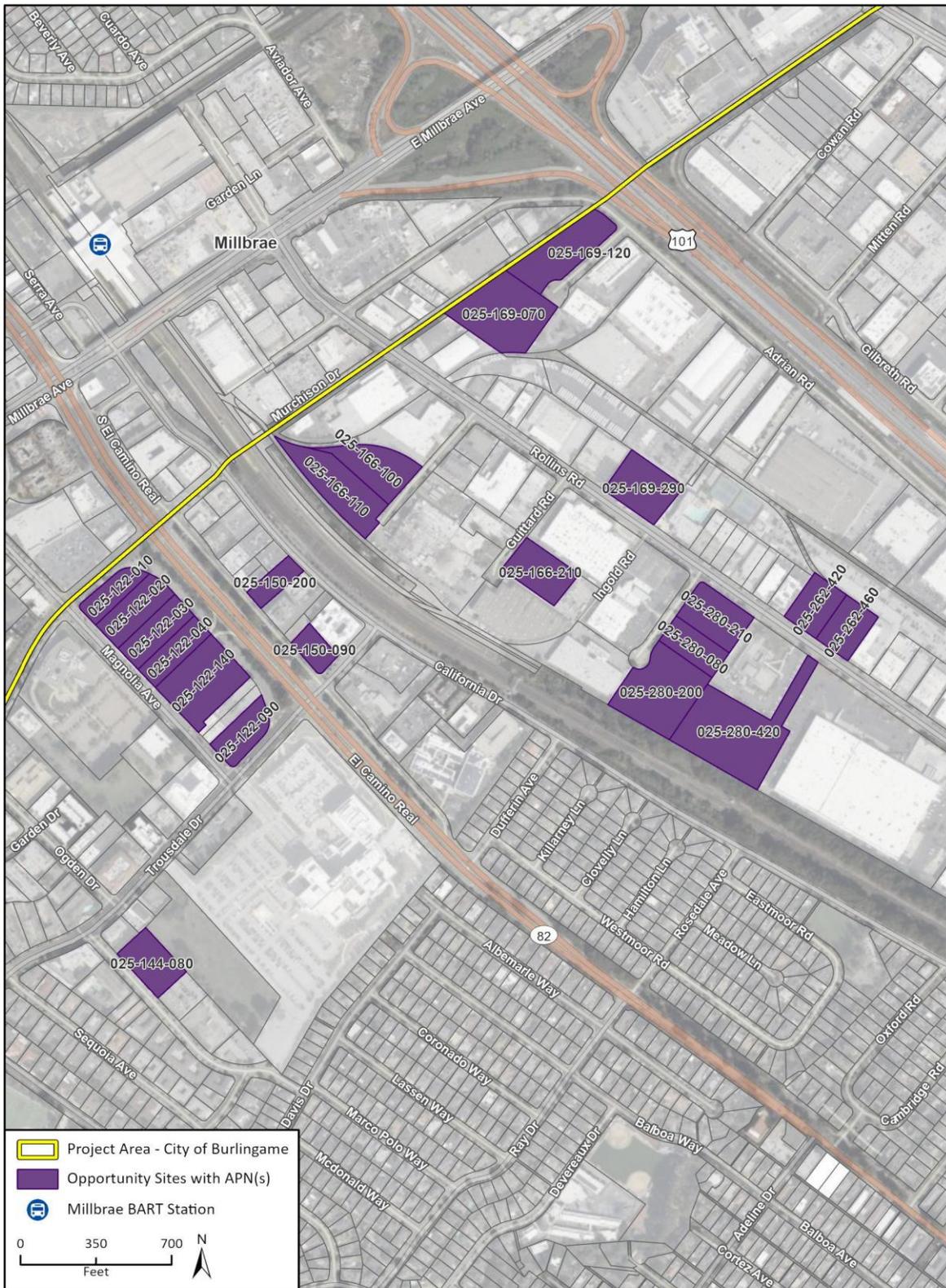


Figure 5 Opportunity Sites Map – North Burlingame



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 Fig 5 Opportunity Sites - North Burlingame

Housing Element Buffer

To ensure that sufficient capacity exists in the HEU to accommodate the RHNA throughout the planning period, the State recommends that the jurisdiction create a buffer in the housing element inventory of at least 15 to 30 percent more capacity than required, especially for capacity to accommodate the lower income RHNA. The Housing Element does not assume significant housing production beyond the RHNA target of 3,257; the buffer is only to ensure that adequate sites are available should development projects be built at lower densities or different income levels than anticipated, and/or if entitled projects do not proceed to construction. As shown in Table 3, the buffers range from 8 percent to 132 percent depending on income category.

Table 3 Sites Inventory Affordability Breakdown

Income Level	Very Low	Low	Moderate	Above Moderate	Total Units
RHNA	863	497	529	1,368	3,257
Pipeline Projects	253	234	97	2,224	2,808
ADUs	50	50	50	17	167
Key Vacant/Nonvacant Sites	658	363	422	934	2,378
Total	961	647	569	3,175	5,353
Buffer	11%	30%	8%	132%	181%

Source: City of Burlingame Housing Element Table HE-32

Opportunity Sites Located Near Transit-Oriented Areas

There are several major transit stops within 0.5-mile of a majority of the proposed opportunity sites. These include the Burlingame Caltrain station, Millbrae BART/Caltrain station, and San Mateo County Transit District (Samtrans) routes ECR and 397. These sites are within walking distance of the existing transit stops that serve Downtown and northern Burlingame. As shown in Figure 5, 25 of the 31 opportunity sites identified in the HEU are within the northern portion of Burlingame. These sites are located in areas within walking distance of frequent bus and shuttle service stops, specifically San Mateo County Transit District (Samtrans) route ECR and 397, which serves the El Camino Real & Trousdale Drive bus stop. These opportunity sites are also within walking distance to the Millbrae BART station located at 200 Rollins Road in Millbrae, as shown in Figure 3. As shown on Figure 4, six of the 31 opportunity sites identified in the HEU are within Downtown Burlingame and located within 0.5-mile of the Caltrain station located at 290 California Drive. Furthermore, all of the proposed opportunity sites are located within a short distance of El Camino Real, which has been identified as a high-quality transit corridor by the Metropolitan Transportation Commission (MTC), as defined by California Public Resources Code, Section 21155(b)(3).

Housing Element Update CEQA Assumptions

CEQA Buildout Assumptions

For the purposes of the CEQA analysis, this document assesses a “maximum development scenario,” which is a greater amount of development potential than what was analyzed in the 2040 General Plan EIR. The EIR relied upon a “projected buildout scenario” which encompassed population growth that could be accomplished within existing urban areas that already support urban infrastructure, i.e., a reasonable expected buildout scenario, rather than maximum potential buildout.

In comparison, the HEU relies on a maximum buildout scenario. This scenario assumes the maximum population growth potential of residential units within the city that could occur under the HEU. However, the proposed project's actual contribution to population growth may be less than estimated here, as housing development is mainly accomplished by the private sector and dependent on factors independent of City control, such as financial resources. This scenario allows a full analysis of potential impacts in the event that development occurs at a rate higher than it has historically. This maximum development scenario assumes that the entire housing sites inventory would be developed as housing as allowed by existing land use and zoning designations and does not account for removal of existing development (primarily low-rise commercial uses) that would be demolished to allow for housing. As a result, the impact analysis represents a conservative approach to assessing potential impacts.

The CEQA analysis for the HEU is focused on the resulting physical changes that would take place as a result of the implementation of the HEU. However, the proposed HEU does not include and would not require zoning changes that could result in changes in the uses, scale or density of development beyond what is allowed under the existing General Plan and zoning designations. While the HEU does include programs that indicate that potential zoning code updates may occur, as needed, any potential zoning code updates will be done in the future. In addition, potential zoning code updates that would occur as a result of HEU programs, would not result in changes to land use densities, compared to existing allowable densities. As such, this would not result in a physical impact on the environment that is different than what was envisioned in the 2019 EIR and for that reason is not discussed further.

CEQA Baseline and Comparison to the 2019 EIR

The CEQA baseline for this analysis is the maximum allowable development for residential uses under the City's 2040 General Plan EIR in 2019. The 2019 General Plan EIR determined that the projected buildout population is what can be accomplished within existing urban areas that already support urban infrastructure. None of the General Plan growth would be accommodated on land that requires the expansion of urban infrastructure or that is outside of the urbanized portions of the city.

The 2019 EIR made projections of its potential buildout based on historic trends. However, since the General Plan was adopted, the City has seen a significant increase in buildout compared to historic trends. The potential growth anticipated by the HEU is based on current trends that the City has observed. And for that reason, the potential growth associated with the HEU is greater than what was anticipated in the 2019 EIR. Below is a summary of the additional growth anticipated by the HEU.

Based on historic trends, the 2040 General Plan EIR assumed that an additional 2,951 housing units could be constructed in Burlingame as a result of the General Plan. In total, the 2019 General Plan assumed 16,065 total dwelling units by 2040.¹ This translates to a projected population of 36,600 residents at full buildout, a net increase of 6,876 residents.

As discussed above, the HEU buildout analyzed in the Addendum is what could be accommodated under buildout of the General Plan, including the HEU, based on the latest trends observed by the City. The HEU would allow for growth to occur due to implementation of its goals, policies, and programs. Given that the HEU projected population trends based on the latest trends and given that

¹ 16,065 = 13,114 (existing) + 2,951 (new units allowed by the 2040 General Plan).

the HEU would include goals, policies, and programs that would allow for growth, the HEU would result in growth beyond what was estimated in the 2019 EIR.

As shown on Table 4, buildout from the proposed HEU under the maximum development scenario would result in 2,402 more residential units and 5,864 more residents compared to the buildout projections analyzed in the 2040 General Plan EIR. With the proposed project, the updated number of housing units would be 18,467² and the updated population would be 42,464³ (if all pipeline projects and every site in the sites inventory were built to full capacity).

Please note that the air quality and noise analysis in this Addendum was prepared at an earlier stage of the Addendum, before the residential unit counts for the Key Vacant/Nonvacant Sites were finalized. The air quality and noise analysis were based on a slightly higher estimated buildout of 2,859 net new housing units, which translated to 18,924 total residential units, and a total population of 43,552. Because these buildout out numbers are greater than the final buildout numbers, the air quality and noise analysis would be conservative and the City did not update the analysis.

Table 4 Total Development Evaluated in the 2019 EIR Compared to the Housing Element Update

	Buildout under General Plan EIR	Buildout under Proposed Housing Element Update (including buffer)	Change in Buildout
Net New Housing Units (# of units)	2,951	5,353	+2,402
Net New Population (# of people)	6,876	12,740 ¹	+5,864

¹ Based on Burlingame persons per household of 2.38 (DOF 2022)

Project Objectives

The purpose of the project is to address the housing needs of the City, to support City programs to increase diversity and housing affordability, and to update the 2040 General Plan to meet the requirements of current State law. Burlingame’s Housing Element identifies strategies and programs that focus on:

- Providing adequate housing sites to meet the City’s RHNA and provide an appropriate buffer of additional housing development capacity;
- Assisting in the provision of housing for all income levels;
- Retaining existing inventory of affordable housing;
- Removing governmental and other constraints to housing investment; and
- Affirmatively furthering fair housing opportunities.

Required Approvals

The City Council would need to take the following discretionary actions in conjunction with the proposed HEU:

- Adoption of the 2023-2031 Housing Element of the General Plan
- Amendments to the General Plan to ensure internal consistency between the Housing Element and other chapters. This would include changes to the Safety Element to meet current State law requirements.

² 18,467 = 16,065 (2040 General Plan Baseline) + 2,402 (new units allowed by the proposed project).

³ 42,464 = 36,600 (2040 General Plan Baseline) + 5,864 (new population from the proposed project).

California Native American Tribal Consultation

On June 22, 2023, the City of Burlingame contacted California Native American Tribal governments by sending a Senate Bill (SB) 18 notification letter via email to tribes with an affiliation with the project area based on a list provided by the Native American Heritage Commission (NAHC). Under SB 18, Native American tribes have 90 days to respond and request further project information and request formal consultation. The City did not receive a request for formal consultation under SB 18. Therefore, no California Native American Tribes traditionally or culturally affiliated with the project area have requested consultation pursuant to Public Resources Code Section 21080.3.1.

4 Environmental Checklist and Impacts of Proposed Changes to the General Plan

This Addendum evaluates potential environmental impacts that could result from the proposed Housing Element Update. The existing environmental conditions in Burlingame are substantially the same under present conditions as described in the 2019 EIR; the analysis below provides updates where necessary to characterize potential impacts.

Appendix G of the CEQA Guidelines provides a checklist of environmental issues areas that are suggested as the issue areas that should be assessed in CEQA analyses. The 2019 EIR addressed in detail 18 of the 20 suggested environmental issue areas. Impacts associated mineral resources were not discussed in depth as no impacts were found to occur. In addition, updates to the CEQA guidelines have resulted in two additional issue areas, Energy and Wildfire. Energy is addressed within Chapter 22, *CEQA-Mandated Section*, of the 2019 EIR. Wildfire was briefly addressed within Section 8, *Hazards and Hazardous Materials*. However, in order to provide a thorough and conservative analysis of potential impacts associated with the proposed text amendment to the 2040 General Plan, this Addendum addresses all 20 environmental issue areas suggested by Appendix G of the CEQA Guidelines, as listed below.

- | | |
|----------------------------------|-------------------------------|
| 1. Aesthetics | 11. Land Use/Planning |
| 2. Agriculture and Forestry | 12. Mineral Resources |
| 3. Air Quality | 13. Noise |
| 4. Biological Resources | 14. Population/Housing |
| 5. Cultural Resources | 15. Public Services |
| 6. Energy | 16. Recreation |
| 7. Geology/Soils | 17. Transportation |
| 8. Greenhouse Gas Emissions | 18. Tribal Cultural Resources |
| 9. Hazards & Hazardous Materials | 19. Utilities/Service Systems |
| 10. Hydrology/Water Quality | 20. Wildfire |

Potential environmental impacts of the proposed project are analyzed to determine whether impacts are consistent with the impact analysis provided in the 2019 EIR, and whether additional mitigation measures are required to minimize or avoid potential impacts. Where impacts are identified in the following analysis, discussion of existing applicable policies and regulations are also discussed as relevant to the avoidance of potential impacts.

1. Aesthetics

Impacts of 2040 General Plan

The 2019 EIR determined that impacts related to aesthetics from implementation of the General Plan would be less than significant with no mitigation required (Section 5, *Aesthetics and Visual Resources*). New development under the General Plan would alter the visual character in parts of Burlingame. However, development would be required to comply with existing regulations and General Plan policies, which would result in cumulative mitigating benefits. Moreover, several policies in the 2040 General Plan would ensure that new development would be compatible with the existing built environment. Of those policies, those relevant to the proposed project are listed below.

- Policy CC-4.2** Emphasize attractive building and site design by paying careful attention to building scale, mass, placement, architecture, materials, landscaping, screening of equipment, loading areas, signage and other design considerations.
- Policy CC-4.7** Regulate the design of streets, sidewalks, cluster home development, architecture, site design, grading, landscaping, and utilities in hillside areas to protect aesthetics, natural topography, and views of surrounding open space and distant landscapes.

Impacts of the Proposed Project

The proposed project would result in development that would occur in the same areas as those analyzed in the General Plan; there would be no changes to the land use or zoning maps and no change to the General Plan boundaries. Development standards in the zoning code, General Plan policies regarding design, and Residential Design Standards and Guidelines would also apply. In addition, the new units would be primarily infill development met through pipeline projects, ADUs, and underutilized sites. Given their expected size and location, the new units are not likely to adversely affect the existing aesthetic quality in the proposed project area. New development under the HEU would be required to comply with existing regulations and zoning standards regarding building height, scale, lighting, and design, similar to development analyzed within the 2019 EIR.

In addition, in accordance with Public Resources Code Section 21099, Modernization of Transportation Analysis for Transit-Oriented Projects, aesthetics shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets the following criteria:

- The project is on an infill site.
- The project is in a Transit Priority Area (TPA). A TPA is an area within 0.5 mile of a major transit stop.
- The project is a residential, mixed-use residential, or employment-center use.

Most of the future residential projects (that would be accommodated by the HEU) would meet these criteria. These future projects that meet these criteria would not result in an aesthetics impact pursuant to CEQA.

Furthermore, applications for housing subject to the proposed project would be subject to the Burlingame Municipal Code Section 25.68.060 which requires that future development be reviewed by the Planning Commission for consistency with applicable design guidelines and compatibility with existing character. Compliance with these requirements would ensure that the new housing would

not substantially degrade the existing visual character in the proposed project area, damage existing scenic resources, or create light or glare that would adversely affect views.

The proposed project would not result in new or substantially more severe impacts to aesthetics and the proposed project would therefore be consistent with the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur related to aesthetics, and no new mitigation measures are necessary.

Conclusion

Less than Significant Impact (Same as 2040 General Plan)

2. Agriculture and Forestry Resources

Impacts of 2040 General Plan

The 2019 EIR determined that implementation of the General Plan would result in no impacts to agricultural or forestry resources (Section 6, *Agricultural and Forestry Resources*). The City of Burlingame is an almost fully developed, urbanized area that does not contain any areas zoned or designated solely for commercial agriculture or forestry resources; therefore, there are no potential impacts from future development under the 2040 General Plan.

Impacts of the Proposed Project

The proposed project would not include uses or activities related to agriculture and forestry and would not introduce uses or activities to areas designated for agriculture or forestry, nor would there be changes to the City's land use or zoning maps. Thus, the proposed project would not result in the loss or conversion of agricultural or forest land. Moreover, there are no areas zoned or designated solely for commercial agriculture or forestry resources within or near the proposed opportunity sites. Therefore, the proposed project would not introduce new impacts or substantially increased impacts related to agriculture and forestry resources and would be consistent with the impact analysis provided in the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur related to agriculture and forestry resources, and no new mitigation measures are necessary.

Conclusion

No Impact (Same as 2040 General Plan)

3. Air Quality

Impacts of 2040 General Plan

The 2019 EIR determined that air quality impacts from implementation of the General Plan would be less than significant with no mitigation required (Section 7, *Air Quality*). Air Quality impacts from the General Plan are discussed in terms of two categories: short-term impacts due to construction

and long-term operational impacts. While construction related to buildout of the General Plan would result in emissions of pollutants, the 2019 EIR concludes that such impacts would be less than significant with implementation of Bay Area Quality Management District (BAAQMD) guidelines and measures.

In terms of long-term operational impacts, the General Plan would result in increases in population and employment and consequently an increase in traffic and air pollutant emissions. However, the 2019 EIR concludes that the projected population and employment growth in the General Plan and several General Plan Policies would be consistent with the goals or regional air quality planning. Development under the General Plan could also result in new sensitive receptors, including residential uses near non-residential uses, which could result in impact from odors and other pollutants. However, the 2019 EIR concludes that such impacts would be less than significant with implementation of General Plan policies to ensure compatibility of residential development with surrounding uses. Of those policies, some of those relevant to the proposed project are listed below.

- Policy HP-3.2** Work with local businesses, industries, and developers to reduce the impact of stationary and mobile sources of pollution. Ensure that new development does not create cumulative net increases in air pollution, and require Transportation Demand Management Techniques (TDM) when air quality impacts are unavoidable.
- Policy HP-3.3** Require that developers mitigate impacts on indoor air quality for new residential and commercial developments, particularly along higher-density corridors, near industrial uses, along the freeway and rail line, such as in North Burlingame, along Rollins Road, and in Downtown. Potential mitigation strategies include installing air filters (MERV 13 or higher), building sound walls, and planting vegetation and trees as pollution buffers.
- Policy HP-3.10** Ensure projects that generate truck traffic and existing truck routes avoid sensitive land uses such as schools, daycares, senior facilities, and residences.
- Policy HP-3.11** Require dust abatement actions for all new construction and redevelopment projects.
- Policy HP-3.12** Require construction projects to implement the Bay Area Air Quality Management District's Best Practices for Construction to reduce pollution from dust and exhaust as feasible.

Impacts of the Proposed Project

The proposed project would result in development that would occur in the same areas as those analyzed in the General Plan; there would be no changes to the land use or zoning maps and no change to the General Plan boundaries. However, the proposed HEU would increase residential units compared to the 2019 EIR.

Air quality impacts from construction activities would be temporary and would not generate substantially greater air quality impacts than those analyzed in the 2019 EIR. The 2019 EIR concludes that the projected population and employment growth in the General Plan and several General Plan Policies would be consistent with the goals or regional air quality planning. The implementation of these policies would render potential construction emissions impacts from future development projects consistent with 2017 Clean Air Plan's goal to attain air quality standards. Of those policies, some of those relevant to the proposed project are listed below.

Policy HP-3.11 Require dust abatement actions for all new construction and redevelopment projects.

Policy HP-3.12 Require construction projects to implement the Bay Area Air Quality Management District’s Best Practices for Construction to reduce pollution from dust and exhaust as feasible.

The 2019 EIR concludes that operational air quality impacts generated by the General Plan would be less than significant because population growth in the General Plan Area would be consistent with the region-wide growth projections in the 2017 Clean Air Plan. The 2019 EIR also determined that the projected increase in VMT under the proposed Burlingame 2040 General Plan would not exceed the projected population increase that would occur under the General Plan, as shown below in Table 5.

Table 5 Net Increase in Housing Element Population versus VMT

Scenario	2040 General Plan	2040 General Plan Plus HEU	Net Increase
Population	36,600 ¹	43,552 ²	6,952 ²
Percentage change			19%
VMT (Daily)	1,461,059	1,556,615	95,556
Percentage change			7%

¹ Population growth estimate based on Table 7-12 of the 2019 EIR

² As described in Section 3, Project Description, this analysis was based on a slightly higher estimated total population of 43,552, which represents a net growth of 6,952. The anticipated population associated with the proposed project is 42,464 with a net growth of 5,864.

Source: Hexagon Transportation Consultants, 2023

As shown above, the proposed project would result in a 7 percent increase in daily VMT. However, as shown in Table 5, the VMT increase is less than the population increase. As in the 2019 EIR, the projected increase in VMT from the proposed project would not exceed the projected population increase. As such, the proposed project would have the same less than significant impact as identified in the 2019 EIR.

In addition, the proposed opportunity sites are within proximity to existing transportation and pedestrian facilities. Growth under the proposed HEU would be located within 0.5 mile of El Camino Real, which has been identified as a high-quality transit corridor by the Metropolitan Transportation Commission (MTC), as defined by California Public Resources Code, Section 21155(b)(3). Furthermore, some of the proposed opportunity sites are within a half mile of a major transit stop, including the Millbrae BART/Caltrain Station as well as the Burlingame Caltrain Station. The HEU focuses growth in areas located near commercial uses and services and on underutilized sites. CEQA Guidelines Section 15064.3 (b)(1) states the following: “...Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.” Because of the proposed project’s proximity to major transit stops and a high-quality transit corridor, the proposed project would have reduced VMT compared to existing conditions and would also reduce air quality impacts from vehicle trips, compared to existing conditions. The proposed project would not result in significant operational impacts to air quality beyond those generated by the General Plan.

The proposed project would not introduce new impacts or substantially increased impacts related to air quality and would be consistent with the impact analysis provided in the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur related to air quality, and no new mitigation measures are necessary.

Conclusion

Less than Significant Impact (Same as 2040 General Plan)

4. Biological Resources

Impacts of 2040 General Plan

The 2019 EIR determined that impacts on biological resources from implementation of the General Plan would be less than significant with no mitigation required (Section 8, *Biological Resources*). Because Burlingame has been largely urbanized for many years, important biological resources are almost entirely associated with existing undeveloped areas of the City. Most of these are protected from future development by existing land use designations: parks and open space areas, creek corridors, lagoons, bay and estuaries, and areas of undevelopable topography or where geologic or other hazards exist. Moreover, City measures and policies aimed at minimizing loss of biological resources and habitat would reduce impacts from potential development. The 2019 EIR identifies General Plan policies that would further reduce biological impacts to less than significant levels. Of those policies, those relevant to the proposed project are listed below.

- Policy HP-5.1** Preserve critical habitat areas and sensitive species within riparian corridors, hillsides, canyon areas, tree canopies, and wetlands that are within the City's control. Consult with the California Department of Fish and Wildlife to identify and map significant habitat areas, and focus protection measures on habitats with special status species. Protect declining or vulnerable habitat areas from disturbance during design and construction of new development.
- Policy HP-5.2** Identify and protect habitats that contribute to the healthy propagation of migratory birds, including trees and natural corridors that serve as stopovers and nesting places. Avoid construction activities that involve tree removal between March and June unless a bird survey has been conducted to determine that the tree is unused during breeding season by avian species protected under California Fish and Game Codes 3503, 3503.5 and 3511.
- Policy HP-5.3** Protect and restore riparian corridors to ensure they function as healthy biological areas and wildlife habitats. Where appropriate, restore riparian habitat with native vegetation.
- Policy HP-5.5** Continue to preserve and protect valuable native trees and introduced species that contribute to the urban forest, but allow for the gradual replacement of trees for on-going natural renewal. Promote replacement with native species. Use zoning and building requirements to ensure that existing trees are integrated into new developments and that existing trees are well protected during construction activity.

- Policy HP-5.11** Protect Burlingame’s canyon and hillside areas by ensuring that construction adjacent to these spaces is environmentally sensitive and preserves natural topography and vegetation.
- Policy HP-5.12** Preserve wetland habitat and associated species in compliance with the federal “no net loss” policy. Where jurisdiction allows, establish buffer zones at the edge of wetland habitats, and restrict development in these zones. If development occurs adjacent to a wetlands area, ensure a qualified biologist has conducted a wetlands delineation in accordance with federal and State guidelines.
- Policy HP-5.14** Through environmental review, ensure that all projects affecting resources of regional concern satisfy regional, State, and federal laws.

Impacts of the Proposed Project

The proposed project would result in development that would occur in the same areas as those analyzed in the General Plan; there would be no changes to the land use or zoning maps and no change to the General Plan boundaries. New housing would also be required to adhere to City measures and policies to reduce biological resources impacts. Development under the project would occur on parcels that have already been developed and not within areas designated as open space or where vegetation and other biological resources would be affected. As a result, the proposed project would not introduce new impacts or substantially increased impacts related to biological resources and would be consistent with the impact analysis provided in the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur to biological resources, and no new mitigation measures are necessary.

Conclusion

Less than Significant Impact (Same as 2040 General Plan)

5. Energy

Impacts of 2040 General Plan

The 2019 EIR determined that energy impacts from implementation of the General Plan would be less than significant with no mitigation required (Section 22.6, *Energy*). The 2019 EIR concluded that new and existing land uses within Burlingame would consume energy during construction and to support normal day-to-day operations in the form of gasoline, diesel, natural gas, and/or electricity. However, the Bay Area is well served by suppliers of gasoline and diesel fuels; the energy required to support development occurring under the proposed General Plan Update would not constitute a significant impact for demand for these sources of energy. Additionally, the City of Burlingame is committed to sustainable practices that would enhance community-wide energy efficiency, including General Plan policies that would reduce energy impacts, such as those presented below.

- Policy HP-2.6** Pursue the goal of using 100% renewable energy for the City’s municipal accounts. Encourage residents and businesses to opt up to 100% renewable purchase for additional community-wide greenhouse gas reductions. Encourage and support opportunities for developing local solar power projects.

- Policy HP-2.7** Encourage homeowners to install solar power systems. Provide information to homeowners on the benefits of solar power and funding opportunities. Promote Property Assessed Clean Energy (PACE) programs that finance renewable energy systems. Offer incentives for home solar power systems.
- Policy CC-1.7** Incentivize solar panel installation on existing buildings and new developments.
- Policy CC-1.9** Support the use of sustainable building elements such as green roofs, cisterns, and permeable pavement. Continue to enforce the California Green Building Standards Code (CALGreen). Adopt zero net-energy building goals for municipal buildings.

Impacts of the Proposed Project

The proposed project would result in additional housing units on certain parcels, where requested by applicants and approved by the City. However, there would be no changes to the land use or zoning maps and no change to the General Plan boundaries. The proposed HEU would increase residential units compared to the 2019 EIR. However, new housing projects would be required to comply with standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. California's Green Building Standards Code (CALGreen; California Code of Regulations, Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the California Energy Commission. As the name implies, these standards are specifically crafted for new buildings to result in energy efficient performance, so the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. Furthermore, new housing projects would further reduce their use of nonrenewable energy resources as the electricity generated by renewable resources provided by PG&E continues to increase to comply with state requirements through Senate Bill 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. Therefore, the proposed project would not result in new or substantially more severe energy impacts and the proposed project would therefore be consistent with the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur related to energy use, and no new mitigation measures are necessary.

Conclusion

Less than Significant Impact

6. Geology/Soils

Impacts of 2040 General Plan

The 2019 EIR determined that geology and soils impacts from implementation of the General Plan would be less than significant with no mitigation required (Section 9, *Geology, Soils, and Minerals*). Development built on or near the San Andreas Fault zone could expose people and structures to a

fault rupture. Portions of the city are also subject to liquefaction, soil erosion, settlement and subsidence, landslides and lateral spreading, and contain expansive soils. However, adherence to State-mandated building standards and compliance with the Earthquake Fault Zoning Act and General Plan policies would reduce the risk to property and human health. Some of the relevant General Plan policies are listed below.

Policy CS-7.1 Require any site with a slope exceeding 10 percent to reference the Landslide Hazard Potential Zone maps of the State of California for all required geotechnical and structural analysis.

Policy CS-7.2 Require that any residential facility that is being increased more than 50 percent assessed value or physical size conform to all provisions of the current building code throughout the entire structure.

Policy CS-7.3 Create and implement a geologic review procedure that requires geologic reports be prepared as part of the development review process.

Impacts of the Proposed Project

The proposed project would result in development that would occur in the same areas as those analyzed in the General Plan; there would be no changes to the land use or zoning maps and no change to the General Plan boundaries. As a result, the proposed project would be subject to the same impacts as those identified in the 2019 EIR. Development within Burlingame would continue to be subject to provisions of the California Building Code and General Plan to minimize or avoid potential hazards relevant to geological issues. Adherence to these requirements would reduce the potential for property damage, injury, or death resulting from seismic hazards. As a result, the proposed project would not introduce new impacts or substantially increased impacts related to geology, soils, and seismicity, and would be consistent with the impact analysis provided in the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur to geology, soils, and seismicity, and no new mitigation measures are necessary.

Conclusion

Less than Significant Impact (Same as 2040 General Plan)

7. Greenhouse Gas Emissions

Impacts of 2040 General Plan

The 2019 EIR determined that greenhouse gas (GHG) emissions impacts from implementation of the General Plan would be significant and unavoidable (Section 10, *Greenhouse Gas Emissions*). Development associated with implementation of the General Plan would be inconsistent with the 2017 Scoping Plan Update, and the 2017 Clean Air Plan, because community-wide emissions would not be in line with state GHG reduction goals. As such, to mitigate this, the 2019 EIR includes Mitigation Measure 10-1 which proposes new General Plan Policies M-3.10, M-4.7, and IF-6.9 which would implement a bicycle sharing program, increase available shuttles, and increase renewable energy enrollment through ECO100. The EIR could not conclusively demonstrate that the General

Plan would not generate GHG emissions that exceed the City's Year 2020, Year 2030, Year 2040 GHG reduction goals. Therefore, this impact was found to be significant and unavoidable.

The 2019 EIR also determined that the General Plan would be inconsistent with Plan Bay Area 2040, because the City cannot demonstrate the currently adopted Specific Plans within the Burlingame El Camino Real PDA in conjunction with the policies contained in the proposed update would reduce per capita CO₂ emissions from passenger vehicles and light duty trucks by 15 percent, by 2035. Accordingly, the 2019 EIR found that the 2040 General Plan would conflict with or obstruct implementation of a plan, policy, or regulation adopted with the intent to reduce GHG emissions. No feasible mitigation was identified. Thus, this impact was found to be significant and unavoidable in the 2019 EIR.

Since preparation of the 2019 EIR, BAAQMD has updated the thresholds of significance for Greenhouse Gas Emissions. BAAQMD identifies the following threshold for Long Range Plans:

1. Meet State's goals to reduce emissions to 40% below 1990 levels by 2030 and carbon neutrality by 2045; or
2. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b)

While the City adopted a Climate Action Plan (CAP) in 2019, the City's CAP was developed at a time when the State had not yet identified its goal of carbon neutrality by 2045 (BAAQMD 2022). As such, while future residential projects associated with the proposed project would reduce GHG emissions through compliance with the 2019 CAP, it cannot be guaranteed that implementation of the 2019 CAP would meet the State's goal of carbon neutrality by 2045.

BAAQMD has also identified the following thresholds of significance that would apply for individual projects:

- Projects must include, at a minimum, the following project design elements:
 1. Buildings
 - a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
 - b. The project will not result in any wasteful, inefficient, or unnecessary energy use as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
 2. Transportation
 - a. The project will achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target that reflects the recommendations provided in the Governor's Office of Planning and Research's *Technical Advisory: Evaluating Transportation Impacts in CEQA*:
 - i. Residential projects: 15 percent below the existing VMT per capita
 - ii. Office projects: 15 percent below the existing VMT per employee
 - iii. Retail projects: no net increase in existing VMT
 - b. The project will achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

Impacts of the Proposed Project

Future building associated with the HEU would comply with the requirement to not include natural gas appliances or natural gas plumbing because the City requires that new residential buildings in the City of Burlingame be all electric, pursuant to the City of Burlingame's 2022 Reach Code (City of Burlingame 2022). Future buildings would not result in any wasteful, inefficient, or unnecessary energy use, as explained in Section 5 of this Addendum. Future buildings are also expected to achieve VMT of 15 percent below the regional average for two reasons. First, most of the future buildings would be located within 0.5 mile of a major transit stop or high quality transit corridor, which can be assumed to have a less than significant VMT impact according to CEQA Guidelines Section 15064.3, subdivision (b)(1). Second, for those buildings that would be located outside of a 0.5 mile of a major transit stop or high quality transit corridor, the City requires projects implement Trip Reduction Measures to achieve the required minimum vehicle trip generation reduction, pursuant to Municipal Code Section 25.43.030. Finally, future buildings would achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2, as this is a City requirement pursuant to Municipal Code Section 25.40.060.

As explained above, future individual projects would comply with the requirements identified in the BAAQMD Guidelines for individual projects. Moreover, the City would implement citywide mitigation for development, which would be required to comply with 2040 General Plan EIR Mitigation Measure 10-1, which would help reduce GHG emissions generated by communitywide activities through additional policies as part of the General Plan Update. However, the proposed HEU would not comply with the requirements for the BAAQMD Guidelines for Plans (since the City's current CAP does not address carbon neutrality by 2045). For this reason, GHG emissions would be similar to or reduced compared to those identified in the certified EIR.

Effects and Mitigation Measures

New or substantially more severe effects would occur to GHG emissions. No new feasible mitigation measures have been identified at this time.

Conclusion

Significant and Unavoidable (Same as 2040 General Plan)

8. Hazards and Hazardous Materials

Impacts of 2040 General Plan

The 2019 EIR determined that hazards and hazardous materials impacts from implementation of the General Plan would be less than significant with no mitigation required (Section 11, *Hazards and Hazardous Materials*). Within the city, there are multiple identified sites with existing and potential problems related to hazardous materials, including water and soil contamination, health hazards from existing or historical land uses that use or generate hazardous materials, and the improper disposal of hazardous materials by business, industry, and individual households. Portions of the city are located within Area B of the Airport Influence Area (AIA) boundary zones of San Francisco International Airport. Thus, as required by State law, all applicable plans, ordinances, and development applications must be reviewed by the City/County Association of Governments of San Mateo County, which serves as the Airport Land Use Commission. Implementation of the General Plan would include residential and commercial land uses, which could involve routine use, storage,

and disposal or transportation of hazardous materials or result in the accidental release of hazardous materials in Burlingame. Nonetheless, compliance with existing federal, state, and city regulations would minimize any potential impacts from hazardous materials. The 2019 EIR includes General Plan Policies that would further reduce hazards impacts. Some of the relevant policies are listed below.

- Policy CS-6.1** Require the proper storage and disposal of hazardous materials to prevent leakage, potential explosions, fire, or the release of harmful fumes. Coordinate with the Fire Department to identify and monitor pre-incident plans associated with hazardous materials storage and use.
- Policy CS-6.3** Explore efficient, economical, and convenient ways to offer household hazardous waste collection for residents in partnership with the solid waste contractors and San Mateo County.
- Policy CS-6.4** Assess future residents' exposure to hazardous materials when new residential development or sensitive populations are proposed within the Live/Work land use designation. Do not allow residential development or sensitive populations if such hazardous conditions cannot be mitigated to an acceptable level of risk.
- Policy CS-8.1** Consider all applicable Federal statutes (including 49 U.S.C. 47107), Federal regulations (including 14 Code of Federal Regulations 77 et seq.), the Federal Aviation Administration (FAA) Airport Compliance Manual, FAA Advisory Circulars, other forms of written guidance, and State law with respect to criteria related to land use safety and airspace protection when evaluating development applications within the Airport Influence Area of the San Francisco International Airport and Mill-Peninsula Medical Center helipad.
- Policy CS-8.2** Require development projects within the Airport Influence Area designated in the Airport Land Use Compatibility Plan of the San Francisco International Airport to comply with all applicable Federal statutes (including 49 U.S.C. 47107), Federal regulations (including 14 Code of Federal Regulations 77 et seq.), the FAA's Airport Compliance Manual, FAA Advisory Circulars, other forms of written guidance, and State law with respect to criteria related to land use safety and airspace protection.
- Policy CS-8.3** Ensure all applicable plans, ordinances, and development applications are reviewed by the City/County Association of Governments for San Mateo County's Airport Land Use Commission, as required by State law.

Impacts of the Proposed Project

The proposed project would result in development that would occur in the same areas as those analyzed in the General Plan; there would be no changes to the land use or zoning maps and no change to the General Plan boundaries. As such, the proposed project would be subject to the same impacts as those identified in the 2019 EIR. New housing does not typically introduce hazardous materials and any hazardous materials that would be generated by the proposed project would be limited to the kind of hazardous materials typically found in residential areas (i.e., cleaning projects, paint, etc.). New housing would be required to comply with the same local, state, and federal regulations identified in the General Plan. Furthermore, future development would require compliance with Section 25.41.050 of the Burlingame Municipal Code which states that the use, handling, storage, and transportation of hazardous and extremely hazardous materials must comply with the provisions of the California Hazardous Materials Regulations and the California Fire and

Building Codes, as well as the laws and regulations of the California Department of Toxic Substances Control and the County Environmental Health Agency. Housing Opportunity Sites in the most northern portions of the city near the airport are subject to height limits imposed by the FAA and SFO Airport. The maximum height in the portions of this area affected by the flight paths is limited based on the Height Restrictions specified in the San Mateo County Comprehensive Airport Land Use Plan. Through compliance with the San Mateo County Comprehensive Airport Land Use Plan, any future impacts associated with safety hazards or excessive noise (due to the project being located near an airport) would be reduced to a less than significant level. Future development would be required to comply with these existing regulations. Furthermore, the SFO Airport Land Use Commission has reviewed the HEU and determined that it is consistent with the Airport Land Use Compatibility Plan (ALUCP). Thus, the proposed project would not introduce new impacts or substantially increased impacts related to hazards and hazardous materials and would be consistent with the impact analysis provided in the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur related to hazards and hazardous materials and no new mitigation measures are necessary.

Conclusion

Less than Significant Impact (Same as 2040 General Plan)

9. Historic and Cultural Resources

Impacts of 2040 General Plan

The 2019 EIR determined that cultural resources impacts from implementation of the General Plan would be less than significant. Impacts on paleontological resources would be less than significant with mitigation incorporated (Section 12, *Historic and Cultural Resources*). Development under the General Plan could adversely affect historical resources, including through construction activities that could result in the disturbance of undiscovered archaeological resources during grading or other on-site excavation activities. In addition, development could impact archaeological resources where excavation and other earthmoving activities are required. However, the 2019 EIR concludes that existing regulations and the implementation of the following General Plan policies and their associated actions would reduce potential impacts to a less than significant level. The following General Plan policies are listed in the 2019 EIR and are relevant to the proposed project.

Policy CC-3.1 Require the applicant for any discretionary permit that involves remodeling, removing or substantially altering any structure older than 50 years old at the time of the application to prepare a Historic Resources Survey consistent with State CEQA requirements to identify the historical significance of the property.

Policy CC-3.3 When a structure is deemed to have historic significance, use the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings when evaluating development applications and City projects, or development applications that may affect scenic views or the historic context of nearby historic resources.

- Policy CC-3.4** Integrate consideration of historical and cultural resources into the development review process to promote early resolution of conflicts between cultural resources preservation and other community goals and objectives.
- Policy CC-3.5** Identify opportunities to establish National Park Service Certified Historic Districts to encourage the preservation of Burlingame’s historic neighborhoods and districts, and to qualify property owners for the Federal Preservation Tax Incentives Program.
- Policy CC-3.6** Promote the use of the State Historic Building Code to facilitate the reuse and conversion of historical buildings to alternative uses.
- Policy CC-3.10** Prohibit the demolition of historic resources unless one of the following findings can be made:
- 1) The rehabilitation and reuse of the resource is not structurally or economically feasible.
 - 2) The demolition is necessary to protect the health, safety, and welfare of the public.
 - 3) The public benefits of demolition outweigh the loss of the historic resource.

At the time of the 2019 EIR, information on the likelihood of discovering paleontological resources was not available and there were no existing General Plan policies requiring the discovery, monitoring, and protection of paleontological resources. Therefore, the 2019 EIR includes Mitigation Measure 12-1 which requires development comply with paleontological assessment, monitoring, recovery, and findings. Mitigation Measure 12-1 reduces potentially significant impacts on paleontological resources to less than significant levels.

Impacts of the Proposed Project

The proposed project would result in development that would occur in the same areas as those analyzed in the General Plan; there would be no changes to the land use or zoning maps and no change to the General Plan boundaries. As such, the potential for impacts from the proposed project would be generally the same as what was identified in the 2019 EIR. Moreover, since the new housing units would be primarily infill development on already developed lots, depth and extent of grading would be similar to that anticipated and analyzed in the 2019 EIR. Therefore, the potential to uncover buried resources during construction of new housing would be similar to that anticipated and analyzed in the 2019 EIR. . Future development under the HEU could impact archaeological resources where excavation and other earthmoving activities are required, similar to that anticipated and analyzed in the 2019 EIR. Nevertheless, development would be required to comply with Mitigation Measure 12-1 which would reduce impacts on paleontological resources. Therefore, the proposed project would not introduce new impacts or substantially increased impacts related to historic or other cultural resources and would be consistent with the impact analysis provided in the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur to cultural resources, and no new mitigation measures are necessary.

Conclusion

Less than Significant Impact for Cultural Resources (Same as 2040 General Plan)

Less than Significant with Mitigation for Paleontological Resources (Same as 2040 General Plan)

10. Hydrology/Water Quality

Impacts of 2040 General Plan

The 2019 EIR determined that hydrology and water quality impacts from implementation of the General Plan would be less than significant with no mitigation required (Section 13, *Hydrology and Water Quality*). Construction and operation of future development from the General Plan could result in discharges of hazardous materials, sediment, and wastewater that could contaminate downstream waters. However, the 2019 EIR concludes that compliance with State, regional, and County regulations, policies, and standards would reduce potential impacts.

The 2019 EIR also determined that development from the General Plan would alter stormwater drainage patterns, which could result in substantial erosion, siltation, or flooding in Burlingame. However, implementation of the General Plan goals, policies, and actions, as well as compliance with San Mateo County Flood Control District Hydrology and Hydraulic Manual development standards, would reduce the potential for impacts associated with drainage system changes and increased runoff. The 2019 EIR identifies the following General Plan policies and actions, which would reduce impacts on hydrology and water quality to a less than significant level.

- Policy HP-6.1** Protect and maintain the water quality of the four creek systems and watersheds (Burlingame Creek, Easton Creek, Mills Creek, and Sanchez Creek) that course through the City and drain into San Francisco Bay. Participate in regional efforts, such as the Bay Area Integrated Regional Water Management Plan, to protect Burlingame's waterways and maintain water quality.
- Policy HP-6.5** Work with public and private property owners to reduce stormwater runoff in urban areas and to protect water quality in creeks and the Bay. Require implementation of best management practices to reduce accumulation of non-point source pollutants in the drainage system originating from streets, parking lots, residential areas, businesses, and industrial operations.
- Policy HP-6.6** Continue to follow requirements for the Municipal Regional Stormwater and National Pollutant Discharge Elimination System (NPDES) Permit to monitor stormwater activities, and provide annual reports on compliance activities.
- Policy HP-6.7** Identify opportunities to upgrade and improve the City's stormwater conveyance system.
- Policy IF-4.1** Ensure that local storm drain infrastructure is sufficiently maintained to minimize flood hazards.
- Policy IF-4.2** Identify and correct problems of localized flooding. Promote the use of green infrastructure, whenever feasible, to mimic a natural hydrologic system that uses stormwater as a resource.

- Policy IF-4.4** Encourage Low Impact Development (LID) techniques, such as green infrastructure which uses vegetation and soil to capture, treat, and retain stormwater runoff. Promote the use of pervious surfaces, green streets, and rainwater harvesting to achieve multiple benefits, such as creating open space, improving stormwater quality, and increasing groundwater recharge. Avoid or minimize the impact of stormwater discharges on local receiving waters, including the San Francisco Bay.
- Policy IF-4.5** Design smart improvements to public spaces including streets, parks, and plazas for stormwater retention and groundwater infiltration by diverting urban runoff to bioretention systems and implementing LID techniques. Integrate green infrastructure that restores a natural hydrologic system such as trees, rain gardens, and vegetated swales into the urban environment. Encourage stormwater facilities that are designed to be a functional and attractive element of public spaces.
- Policy IF-4.6** Impose appropriate conditions on grading projects performed during the rainy season to ensure that silt is not conveyed to storm drainage systems.
- Policy IF-4.7** Require new development to be designed to prevent the diversion of stormwater onto neighboring parcels.
- Policy CS-5.3** Continue to require appropriate setback and building elevation requirements for properties located along the Bayshore, lagoons, and in other low-laying areas that are susceptible to the effects of sea level rise. Consider other strategies to support resiliency through design.

Impacts of the Proposed Project

The proposed project would result in development that would occur in the same areas as those analyzed in the General Plan; there would be no changes to the land use or zoning maps and no change to the General Plan boundaries. Development would continue to be subject to the same regulations that would minimize exposure to flood-related hazards and minimize water quality impacts and impacts to wetlands resulting from new development. In addition, Burlingame is primarily built out and proposed development under the HEU would occur in previously developed areas of the city. Therefore, construction of new housing units under the HEU would not substantially increase impervious surface area, alter drainage patterns, or expose additional residents to flood-related hazards. Finally, new projects would be required to comply with Chapter 4.30 of the Burlingame Municipal Code, which requires a storm drainage fee for all parcels of real property in the city that drain into the city storm drainage system. As a result, the proposed project would not introduce new impacts or substantially increase impacts related to hydrology and flooding and would be consistent with the impact analysis provided in the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur to hydrology and flooding, and no new mitigation measures are necessary.

Conclusion

Less than Significant Impact (Same as 2040 General Plan)

11. Land Use/Planning

Impacts of 2040 General Plan

The 2019 EIR determined that land use impacts from implementation of the General Plan would be less than significant with no mitigation required (Section 14, *Land Use and Planning*). The General Plan includes re-designation of some General Commercial areas to be designated as “mixed use” to add higher density housing in areas of high mobility nodes, notably along Broadway, California Drive, and in North Burlingame. The General Plan does not propose any infrastructure or construction that would physically divide the community.

Impacts of the Proposed Project

The proposed project may result in additional housing units on certain parcels, where requested by applicants and approved by the City. However, there would be no changes to the land use or zoning maps and no change to the General Plan boundaries; development would be allowed in the same areas as analyzed in the 2019 EIR. No changes in development standards such as height limits or setbacks are proposed. Existing zoning requirements would ensure that new housing would be compatible with existing neighborhoods. In summary, the proposed project would not result in changes to land use standards identified in the 2040 General Plan.

As a result, the proposed project would not introduce new impacts or substantially increased impacts related to land use, and would be consistent with the impact analysis provided in the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur to land use, and no new mitigation measures are necessary.

Conclusion

Less than Significant Impact (Same as 2040 General Plan)

12. Mineral Resources

Impacts of 2040 General Plan

The 2019 EIR did not analyze mineral resources impacts from implementation of the General Plan in depth because there are no known mineral resources in the city.

Impacts of the Proposed Project

The proposed project would not include uses or activities related to mineral resources and would not introduce uses or activities to areas designated for mineral resource mining. There would be no changes to the land use or zoning maps and no change to the General Plan boundaries. The

proposed project would not introduce new impacts or substantially increase impacts related to mineral resources.

Effects and Mitigation Measures

No new or substantially more severe effects would occur to mineral resources, and no new mitigation measures are necessary.

Conclusion

No Impact

13. Noise

Short-term Construction Noise and Vibration Impacts

Impacts of 2040 General Plan

The 2019 EIR determined that short term construction noise would result in temporary noise generation primarily from the use of heavy-duty construction equipment. Based on the noise levels generated by typical construction equipment and activities, temporary construction noise levels could result in a temporary substantial increase in noise levels above ambient conditions. This would represent a potentially significant impact. The 2019 EIR includes Mitigation Measure 15-1, which requires that future development projects implement appropriate construction noise controls according to General Plan Policy CS-4.10. With implementation of this mitigation measure, impacts would be reduced to less than significant levels.

In addition, the 2019 EIR determined that short-term construction impacts would result in ground-borne vibration at sensitive receptor locations; however, proposed 2040 General Plan policies would ensure construction-vibration levels do not exceed standards recommended by the Federal Transit Administration or Caltrans and impacts would be less than significant.

Impacts of the Proposed Project

The proposed project may result in additional housing units on certain parcels, where requested by applicants and approved by the City. However, there would be no changes to the land use or zoning maps and no change to the General Plan boundaries; development would be allowed in the same areas as analyzed in the 2019 EIR. The kind of construction that would occur because of the proposed project (i.e., housing) would not be substantially different than what was analyzed in the 2019 EIR. Housing would be located in the same area as envisioned by the proposed project and would require the same kind of construction equipment identified in the 2019 EIR. For this reason and because the proposed project would be required to implement the same policies and mitigation measure identified in the 2019 EIR, there would be no change in the impacts identified in the 2019 EIR and short-term construction noise and vibration impacts would continue to be less than significant with mitigation.

Operational Traffic Noise

Impacts of 2040 General Plan

The 2019 EIR modeled the expected changes in the average daily traffic and traffic noise levels. The 2019 EIR also identified that the City considers a significant traffic noise impact as those resulting in a net increase of 5.0 dB or more (where noise levels remain below normally acceptable levels, or a net increase of 3.0 dB or more where noise levels change from normally acceptable to normally unacceptable or worse or already exceed normally acceptable levels (using the proposed 2040 General Plan land use compatibility standards). Based on those thresholds and their modeling, the City identified that there would be one significant impact along Broadway (from El Camino Real to Bernal). All other roadway segments were found to have less than significant traffic noise impacts.

The 2019 EIR identifies that proposed policies would establish noise standards for new development and require that site-specific noise studies be conducted to reduce noise exposure. In addition, the 2019 EIR identified Mitigation Measures 15-3A and 15-3B to address traffic noise impacts.

Mitigation Measure 15-3A requires that the City revise the 2040 General Plan land use and noise compatibility standards (Table CS-2) to better incorporate the City's existing ambient noise environment and the Office of Planning and Research's 2017 General Plan Guidelines. Mitigation Measure 15-3B requires the City to revise Public Draft General Plan Policies CS-4.2 and CS-4.4 to use the CNEL metric when describing the allowable 24-hour interior noise standard for new residential, motel, hotel, nursing home, and hospital development (instead of the LDN metric). Even with application of this mitigation, the City concluded that impacts would remain significant and unavoidable.

Impacts of the Proposed Project

For this Addendum, the City modeled what the additional ADT and noise (CNEL) would be due to the HEU, compared to what was forecasted for the 2040 General Plan. Table 6 identifies the change in ADT and noise (CNEL) that would occur as a result of implementing the 2040 General Plan. Table 6 also identifies the change in ADT and noise (CNEL) that would occur as a result of the HEU, compared to the projected ADT and noise from the 2040 General Plan. As shown in Table 6, the largest change in noise of the proposed project would be 0.7 dBA, which is below the significance threshold of 3.0 dBA. As such, the additional traffic noise would not represent a new significant impact or a more severe impact.

As described above, the City used the 2040 General Plan as the baseline to consider potential traffic noise impacts. In addition, the City considered the potential impact from the proposed project, compared to the Existing Conditions identified in the 2019 EIR. Table 6 shows the net noise change identified in the 2019 EIR (i.e., 2040 General Plan minus Existing Conditions), as well as the net noise change associated with the proposed project (Proposed Project minus 2040 General Plan). The sum of these two numbers represents the noise change of the proposed project, compared to the Existing Conditions identified in the 2019 EIR. Roadway 2B (Broadway, California to El Camino Real) was found to have a net change of 2.9 in the EIR and the proposed project is expected to result in an additional 0.1 dBA of noise, which would result in a 3.0 dBA increase. The proposed project would not result in any other roadways exceeding the 3.0 dBA threshold (compared to Existing Conditions).

Nonetheless, the 2019 EIR already identified a significant and unavoidable impact on operational traffic noise as a result of the General Plan. As described above, the City identified mitigation measures that would address traffic noise impacts. Given that the proposed project would not exceed the 3.0 dBA threshold compared to the 2040 General Plan baseline; given that the proposed

project would only add 0.1 dBA of noise, which is not perceptible, to Roadway 2B (Broadway, California to El Camino Real); and given that the 2019 EIR already disclosed a significant and unavoidable impact, the proposed project’s impacts on traffic noise would not be substantially more severe than what was disclosed in the 2019 EIR.

Table 6 Net Change of Average Daily Traffic and CNEL

ID	Road	Segment	Net Change (2040 General Plan minus Existing Conditions) ^a		Net Change (Proposed Project minus 2040 General Plan) ^b	
			ADT ^c	CNEL ^d	ADT ^c	CNEL ^d
1	Adeline Dr.	El Camino Real to Bernal	81	1.1	0	0.0
2A	Broadway	US101 to California	3,633	1.2	1,039	0.1
2B	Broadway	California to El Camino Real	2,146	2.9	344	0.1
2C	Broadway	El Camino Real to Bernal	645	4.7	0	0.0
3A	California Dr	Peninsula to Highland	-786	0.6	18	0.0
3B	California Dr	Highland to Oak Grove	-5,582	-0.4	343	0.1
3C	California Dr	Oak Grove to Mills	-5,702	-0.5	343	0.3
3D	California Dr	Mills to Trousdale	1,901	1.2	-7	0.0
4	Easton Dr	El Camino Real to Bernal	536	1.6	13	0.0
5A	El Camino Real	Peninsula to Bellevue	8,999	1.9	410	0.0
5B	El Camino Real	Bellevue to Sanchez	11,489	2.3	463	0.0
5C	El Camino Real	Sanchez to Trousdale	11,343	2.3	430	0.1
5D	El Camino Real	Trousdale to Murchison	12,111	2.3	551	0.0
6	Hillside Dr	El Camino Real to Bernal	-323	-0.2	0	0.0
7A	Howard Ave	N. Amphlett to Anita	125	1.9	335	0.3
7B	Howard Ave	Anita to El Camino Real	798	2.4	373	0.3
8A	Murchison Dr	California to El Camino Real	56	0	15	0.0
8B	Murchison Dr	El Camino Real to Sequoia	-174	0.6	3,453	0.7
8E	Murchison Dr	City Limit to Trousdale	501	1.3	5	0.0
9	Rollins Road	Broadway to North City Limit	746	1.2	1,326	0.0
10A	Skyline Blvd	South City Limit to 280 NB Exit	3,323	1.6	131	0.1
10B	Skyline Blvd	280 NB Exit to Trousdale	2,803	1.3	63	0.0
11A	Trousdale Dr	El Camino Real to Loyola	1,003	1.2	8	0.0
11B	Trousdale Dr	Loyola to Sebastian	245	1	951	0.2
11C	Trousdale Dr	Sebastian to West City Limit	-499	0.6	607	0.1
12A	101 NB (HOV)	Within City Limits	186	0.8	187	0.0
12A	101 NB (w/ wall)	Within City Limits	186	0.8	405	0.0
12B	101 SB (w/ wall) - HOV	Toyon to Howard	4,542	0.7	166	0.0
12B	101 SB (w/ wall)	Toyon to Howard	4,542	0.9	527	0.0
13A	280 NB	Adjacent to City Limits	5,579	0.7	364	0.0

ID	Road	Segment	Net Change (2040 General Plan minus Existing Conditions) ^a		Net Change (Proposed Project minus 2040 General Plan) ^b	
			ADT ^c	CNEL ^d	ADT ^c	CNEL ^d
13B	280 SB	Adjacent to City Limits	6,009	0.8	145	0.0

a. These columns represent the net change in ADT and CNEL reported in the 2019 EIR. These numbers represent the change of ADT and CNEL from the General Plan compared to the existing conditions at the time (i.e., General Plan minus Existing Conditions).

b. These columns represent the change of ADT and CNEL from the proposed project compared to the 2040 General Plan (i.e., proposed HEU minus 2040 General Plan).

c. ADT = average daily traffic

d. CNEL = Community Noise Equivalent Level

Operational Stationary Equipment Noise

Impacts of 2040 General Plan

The 2019 EIR identified that the General Plan could introduce stationary sources of noise, such as those associated with landscape and building maintenance activities, stationary mechanical equipment (e.g., pumps, generators, HVAC units), garbage collection activities, commercial and industrial activities, and other stationary and area sources such as people's voices, amplified music, and public address systems. The 2019 EIR identified that implementation of policies in the General Plan, as well as compliance with City Standards would ensure that noise impacts from stationary sources are less than significant. Applicable regulations and policies include the following.

City Code The Burlingame Municipal Code generally limits noise from certain common stationary and other sources such as speakers (Section 10.40.020), lawnmowers (Section 10.40.037), leaf blowers (Section 10.40.038), loading and unloading activities (Section 10.40.039), and mechanical equipment including HVAC and generators (Section 25.58.050).

Policy CS-4.2 Require the design of new residential development to comply with the following standards:

- The maximum acceptable interior noise level for all new residential units (single-family, duplex, mobile home, multifamily, and mixed-use units) shall be a Ldn of 45 dB with windows closed.
- For project locations that are primarily exposed to noise from aircraft, Caltrain, and Bart operations, the maximum instantaneous noise level in bedrooms shall not exceed 50 dBA at night (10:00 P.M. to 7:00 A.M) and the maximum instantaneous noise level in all interior rooms shall not exceed 55 dBA during the day (7:00 am to 10:00 pm) with windows closed.

Impacts of the Proposed Project

As explained in the *Short-term Construction Noise and Vibration Impacts* Heading, the proposed project would not introduce uses that are substantially different than what was analyzed in the 2019 EIR. In other words, the proposed project would not introduce any new kinds of stationary noise, garbage collection activities, or people's voices, amplified music, and public address systems that weren't already analyzed in the 2019 EIR. Although there may be more residences, the noise associated with those residences would be addressed by the existing municipal code and policies

identified in the 2019 EIR. Because the proposed project would be required to implement the same policies and regulations identified in the 2019 EIR, there would be no change in the impacts identified in the 2019 EIR and operational stationary equipment noise impacts would continue to be less than significant.

Operational Vibration

Impacts of 2040 General Plan

The 2019 EIR determined that the General Plan would involve increases in traffic that could result in ground-borne vibration at sensitive receptor locations. Implementation of the General Plan could also result in exposure of new receptors to Caltrain and freight rail operations that produce ground-borne vibration levels that exceed standards. Proposed 2040 General Plan policies, however, would ensure potential traffic- and rail-generated vibration levels do not exceed standards recommended by the Federal Transit Administration or Caltrans. The 2019 EIR identified that implementation of policies in the General Plan, as well as compliance with State Standards would ensure that rail and freight vibration impacts from stationary sources are less than significant. Applicable regulations and policies include the following:

- Caltrans** In 2013, Caltrans published its Transportation and Construction Vibration Guidance Manual, which provides general guidance on vibration issues associated with construction and operation of projects in relation to human perception and structural damage.
- Policy CS-4.13** Require new residential and commercial projects located within 200 feet of existing major freeways and railroad lines to conduct a ground vibration and vibration noise evaluation consistent with City approved methodologies.

Impacts of the Proposed Project

The proposed project may result in additional housing units on certain parcels, where requested by applicants and approved by the City. However, there would be no changes to the land use or zoning maps and no change to the General Plan boundaries; development would be allowed in the same areas as analyzed in the 2019 EIR. The proposed project would not introduce uses that are substantially different than what was analyzed in the 2019 EIR. In other words, the proposed project would not introduce new kinds of stationary noise that weren't already analyzed in the 2019 EIR. For this reason and because the proposed project would be required to implement the same policies identified in the 2019 EIR, there would be no change in the impacts identified in the 2019 EIR and operational traffic and rail vibration impacts would continue to be less than significant.

Airport Noise

Impacts of 2040 General Plan

The 2019 EIR determined that the General Plan could expose sensitive receptors to airport and heliport noise; however, General Plan policies would ensure noise from these sources do not exceed City or other applicable standards. The 2019 EIR identified that implementation of policies in the General Plan would ensure that airport noise impacts from stationary sources are less than significant. Applicable policies include the following:

- Policy CS-4.8** Require project applicants to evaluate potential airport noise impacts if the project is located within the 60 CNEL contour line of San Francisco International Airport (as mapped in the Airport Land Use Compatibility Plan). All projects shall be required to mitigate impacts to comply with the interior and exterior noise standards established by the Airport Land Use Compatibility Plan.
- Policy CS-4.9** Require that all new development within an airport-defined over-flight zone provide deed notices disclosing airport over-flights and noise upon transfer of title to residents and property owners.

Impacts of the Proposed Project

The proposed project may result in additional housing units on certain parcels, where requested by applicants and approved by the City. However, there would be no changes to the land use or zoning maps and no change to the General Plan boundaries; development would be allowed in the same areas as analyzed in the 2019 EIR. The proposed project would not introduce uses that are substantially different than what was analyzed in the 2019 EIR. In other words, the proposed project would not introduce new kinds of airport noise that weren't already analyzed in the 2019 EIR. For this reason and because the proposed project would be required to implement the same policies identified in the 2019 EIR, there would be no change in the impacts identified in the 2019 EIR and airport noise impacts would continue to be less than significant.

Effects and Mitigation Measures

No new or substantially more severe effects would occur to noise, and no new mitigation measures are necessary.

Conclusion

Significant and Unavoidable Impact (Same as 2040 General Plan)

14. Population/Housing

Impacts of 2040 General Plan

The 2019 EIR determined that housing and population impacts from implementation of the General Plan would be less than significant with no mitigation required (Section 16, *Population and Housing*). The 2019 EIR states that the population of Burlingame was approximately 29,700 in 2017. The 2019 EIR assumed a development capacity of 16,065 dwelling units, which would result in approximately 36,600 residents. The projected population under the General Plan is what can be accomplished within existing urban areas that already support urban infrastructure. None of the proposed growth would be accommodated on undeveloped land that requires the expansion of urban infrastructure. Since the additional housing would be primarily in relatively high-density mixed-use and in-fill developments, the 2019 EIR concludes that implementation of the General Plan would not result in substantial displacement of existing residents or unplanned population growth in the General Plan Area or surrounding communities.

Impacts of the Proposed Project

As discussed within Section 3, Project Description, and shown on Table 4, buildout from the proposed HEU (including buffers) would result in 18,467 total residential units and a population of 42,464. Although the proposed HEU would increase residential units compared to the 2019 EIR, the State requires that all local governments adequately plan to meet the housing needs of their communities. The increase in population would allow Burlingame to provide its fair share of the regional housing, which requires the City to plan capacity for 3,257 new units. The proposed project including the buffers would result in an approximately 101 percent increase in population compared to the population projected by the 2040 General Plan. However, according to ABAG growth patterns, North and Central San Mateo County (of which Burlingame is located between) are anticipated to see growth of 70 percent and 39 percent, respectively (ABAG 2020). This accounts for roughly seven percent of the share of regional growth for the Bay Area.

Furthermore, the proposed HEU would bring the element into compliance with State legislation passed since adoption of the 2015-2023 Housing Element and with the current RHNA. Given that the State is currently in an ongoing housing crisis due to an insufficient housing supply, the additional units under the proposed project would further assist in addressing the existing crisis and meeting the housing needs of the City's communities. Additionally, the proposed HEU would first be submitted to the HCD for review and approval to ensure that it would adequately address the housing needs and demands of the city. Approval by the HCD would ensure that population and housing growth under the proposed HEU would not be unplanned. In addition, at a local level, the City has been planning for the additional growth associated with additional housing through the development of the HEU itself. The HEU is a planning document that identifies policies that would guide the residential growth in the City. As such, the growth that would occur because of the HEU is something that the City has planned for.

Additionally, the proposed opportunity sites are within proximity to existing transportation and pedestrian facilities. Growth under the proposed HEU would be located along El Camino Real which has been identified as a high-quality transit corridor by the Metropolitan Transportation Commission (MTC), as defined by California Public Resources Code, Section 21155(b)(3). In addition, the HEU focuses growth to areas located near commercial uses and services and on underutilized sites. The proposed HEU would facilitate infill growth, promote housing in close proximity to employment opportunities, and support regional planning efforts. Furthermore, as discussed

throughout this Addendum, the proposed HEU would not require zoning changes that could result in changes in the uses, scale or density of development beyond what is allowed under the existing General Plan and zoning designations.

The proposed project is not expected to result in substantial displacement for two reasons. First, none of the 31 sites that the City has identified where residential development could occur (as summarized in Table 2) include existing residential uses. As shown in Appendix D of the HEU, the existing uses at these sites include vacant lots, parking lots, auto storage areas, light industrial areas, and other existing uses that don't have residences. Second, the HEU includes implementation program to prevent displacement, including Program H(A-3) and H(E-1).

In addition, the project would not involve the extension of roads or other infrastructure that could indirectly lead to population growth. The city is mostly developed and is supported by existing public services and infrastructure which are sufficient to serve the additional housing units. Therefore, the proposed project would not introduce new impacts or substantially increased impacts related to population and housing and would be consistent with the impact analysis provided in the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur to population and housing, and no new mitigation measures are necessary.

Conclusion

Less Than Significant (Same as 2040 General Plan)

15. Public Services and Recreation

Impacts of 2040 General Plan

The 2019 EIR determined that impacts on public services from implementation of the General Plan would be less than significant with no mitigation required (Section 17, *Public Facilities and Services*). Implementation of the General Plan would create an increase in residential and commercial development, and thus an increase in jobs and population in Burlingame. However, the 2019 EIR concludes that the projected population increases could be accommodated by existing school capacity and existing fire, police, and parks and recreation services. The 2019 EIR identifies the following General Plan policies and actions, which would reduce impacts to public services to a less than significant level.

- Policy CS-1.2** Develop, maintain, and implement a Police Department Master Plan that guides the provision of equipment, facilities, training, and operations centers.
- Policy CS-2.3** Continue to include the Central County Fire Department in the review of development proposals to ensure projects adequately address fire access and building standards.
- Policy EE-1.4** Support the efforts of the Burlingame School District to implement the School District Facility Master Plan, and ensure timely renovations and reconstructions of aging facilities by including street improvement needs in the City's Capital Improvement Program.

Policy HP-4.4 In concert with development proposals in the North Burlingame and North Rollins Road districts, require plans for publicly accessible open spaces. Design and develop these spaces to fit within the overall parks and recreation system in Burlingame.

Impacts of the Proposed Project

The proposed project may result in additional housing units on certain parcels, where requested by applicants and approved by the City. However, there would be no changes to the land use or zoning maps and no change to the General Plan boundaries; development would be allowed in the same areas as analyzed in the 2019 EIR. The future residential units that could be accommodated by the project would be within the same areas as identified in the 2019 EIR and would therefore be served by the same public services identified in the 2019 EIR.

The proposed project would result in additional population growth, which could place additional demand on public services (i.e., fire, police, schools, recreational resources).

Future projects would be required to comply with the City of Burlingame Municipal Code. Section 105.8, which covers the cost of the Central County Fire Department to review and inspect the intended activities, operations, and functions. In addition, the proposed project would be required to comply with General Plan policies CS-1.1 and CS-1.3 which establish optimal police staffing levels and minimum response times. Furthermore, the Housing Opportunity Sites are located within an existing urbanized area, previously envisioned within the 2019 EIR, and which is served by existing fire and police services and infrastructure.

Regarding schools, future projects would be subject to Senate Bill 50 school impact fees (established by the Leroy F. Greene School Facilities Act of 1998). Section 65996 of the State Government Code states that the payment of the school impact fees established by Senate Bill 50, which may be required by any state or local agency, is deemed to constitute full and complete mitigation for school impacts from development. As such, potential impacts on schools from population growth associated with the proposed project would be addressed through the payment of fees.

Future projects under the proposed project would be required to meet recreation standards through the City's Zoning Standards and Design Guidelines which include provisions for including landscaping and open space in projects. This includes requiring new projects, at minimum, providing at not less than one hundred (100) square feet per dwelling unit. As such, future development would allow and plan for recreational and open spaces within project plans and prior to project approval.

All future development associated with the HEU would be required to pay Public Facilities Impact Fees. The purpose of Public Facilities Impact Fees is to provide funding for necessary maintenance and improvements created by development projects, including general facilities and equipment, libraries, police, parks and recreation, streets and traffic, fire, and storm drainage. Public facilities impact fees are based on the uses, the number of dwelling units, and the amount of square footage to be located on the property after completion of the development project. As such, through payment of the Public Facilities Impact Fees, the incremental demand on public services from additional growth would be addressed. Furthermore, as described in the 2019 EIR, if expansion of fire, police, school, or recreational facilities is needed to meet demand, those future facilities would undergo a development review process and be subject to environmental review pursuant to CEQA. That environmental review would identify site-specific conditions and physical changes resulting from a facility expansion, construction of a new facility, and/or infrastructure improvements needed.

For these reasons, the impacts on public services from the proposed project would be generally the same as those analyzed in the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur to public services, and no new mitigation measures are necessary.

Conclusion

Less than Significant Impact (Same as 2040 General Plan)

16. Transportation

Impacts of 2040 General Plan

The 2019 EIR determined that transportation impacts from implementation of the General Plan would be less than significant with mitigation required (Section 18, *Transportation and Circulation*). The 2019 EIR found that the cumulative mitigating benefits of the General Plan policies listed in Table 18-6 would result in a less-than-significant impact related to the significance criterion, except for impacts on level-of-service (LOS) at the California Drive and Broadway intersection. (A discussion of LOS is included here for information purposes only, given that the CEQA guidelines have been updated since preparation of the 2019 EIR to indicate that LOS is not a CEQA impact, and that agencies should consider impacts to VMT in their CEQA analysis.) The 2019 EIR found that with implementation of Mitigation Measure 18-1, LOS intersection impacts at California Drive and Broadway would be less-than-significant.

The 2019 EIR also concludes that new development under the proposed General Plan would not cause a conflict with the San Mateo County Transit Authority CMP, Plan Bay Area 2040, or the Regional Transportation Plan/Sustainable Communities Strategy. Additionally, the 2019 EIR determined that the General Plan would result in less than significant impacts to air traffic patterns. The General Plan would not result in impacts to traffic hazards due to design features or incompatible uses, emergency access, or VMT. Some of the relevant policies identified in the 2019 EIR are included below.

- Policy M-1.1** Define and develop a well connected network of Complete Streets that can move all modes safely, efficiently, and comfortably to promote efficient circulation while also improving public health and safety.
- Policy M-3.1** Develop a safe, convenient, and integrated bicycle network that connects residential neighborhoods to employment, education, recreation, and commercial destinations throughout Burlingame.
- Policy M-9.2** Establish a transportation impact fee for new development that generates funds for improving all modes of transportation. Recognize that this ties into the update of performance measures, as developer fees and improvements will no longer be tied to intersection operations.

Impacts of the Proposed Project

Pursuant to Section 15064.3 of the CEQA Guidelines, traffic delay, which is what LOS measures and describes, shall not constitute a significant environmental impact for land use projects. Therefore,

the following analysis relies on a VMT threshold instead. The City of Burlingame uses the VMT thresholds identified by the Office of Planning and Research (OPR), which are as follows: “A proposed project exceeding a level of 15 percent below existing VMT per capita may indicate a significant transportation impact” (OPR 2018).

As discussed in Section 7, *Greenhouse Gas Emissions*, CEQA Guidelines Section 15064.3, subdivision (b)(1) states that projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant VMT impact. Most of the proposed opportunity sites for the proposed project are in proximity to existing transportation and pedestrian facilities. Growth under the proposed HEU would be located along El Camino Real, which has been identified as a high-quality transit corridor by the Metropolitan Transportation Commission (MTC), as defined by California Public Resources Code, Section 21155(b)(3). For projects further than one-half mile from an existing major transit stop or an existing high quality transit corridor, the City requires implementation of Trip Reduction Measures to achieve the required minimum vehicle trip generation reduction, pursuant to Municipal Code Section 25.43.030, which would ensure a less than significant VMT impact. In addition, the HEU focuses growth to areas located near commercial uses and services and on underutilized sites. Approved projects would be required to comply with performance standards that would limit new traffic impacts, including that the housing “is in an area near transit and services.” For these reasons, VMT impacts from the proposed project would be less than significant.

Finally, applications for housing under the HEU would be reviewed by the Planning Commission or the Community Development Director, subject to required findings. Compliance with these requirements would ensure that new units approved pursuant to the proposed project would not generate traffic beyond the capacity of the neighborhood in which they are established, conflict with applicable policies or regulations related to circulation, create significant traffic hazards, or impede emergency access. Furthermore, the proposed housing under the HEU would result in projects that are envisioned in local plans that includes development near transit and services to reduce vehicle trips. As a result, the proposed project would not result in new or substantially more severe impacts to transportation, and the proposed project would therefore be consistent with the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur to transportation, and no new mitigation measures are necessary.

Conclusion

Less than Significant Impact (Same as 2040 General Plan)

17. Tribal Cultural Resources

Impacts of 2040 General Plan

The 2019 EIR determined that tribal cultural resource impacts from implementation of the General Plan would be less than significant with no mitigation required (Section 19, *Tribal Cultural Resources*). Development under the General Plan could adversely affect tribal cultural resources, including through construction activities that could result in the disturbance of undiscovered tribal cultural resources during grading or other on-site excavation activities. However, the 2019 EIR

concludes that compliance with State regulations and standards would reduce potential impacts. Future developments under the proposed project would continue to be required to adhere to applicable standards and regulations to reduce tribal cultural resource impacts.

The 2019 EIR discusses that the City did not conduct Assembly Bill 52 (AB 52) outreach, which requires lead agencies to complete consultation with California Native American Tribes regarding proposed projects, because the General Plan is not authorizing the development of a specific project where ground-disturbing activities would take place. However, as part of the CEQA process for the 2019 EIR, the City initiated the consultation process pursuant to SB 18. Five tribes that are active in San Mateo County were sent letters and the NOP for the General Plan EIR by City staff. No tribes responded to the NOP.

Impacts of the Proposed Project

On June 22, 2023, the City of Burlingame contacted California Native American Tribal governments by sending SB 18 notification letter via email (with delivery receipt) to tribes with an affiliation with the project area based on a list provided by the NAHC. The City did not receive a request for formal consultation under SB 18. Future projects proposed under the HEU subject to CEQA, would be subject to project-level CEQA review and would thus be required to meet the requirements of AB 52. Therefore, tribes affiliated with the area would be notified by the City when specific development proposals are submitted to the City for all individual new housing projects under the HEU. The proposed project would result in development that would occur in the same areas as those analyzed in the General Plan; there would be no changes to the land use or zoning maps and no change to the General Plan boundaries. Moreover, since the new housing units would be primarily infill development, they would not involve significant excavation. The proposed project would not introduce new impacts or substantially increased impacts related to tribal cultural resources and would be consistent with the impact analysis provided in the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur to tribal cultural resources, and no new mitigation measures are necessary.

Conclusion

Less than Significant Impact (Same as 2040 General Plan)

18. Utilities/Service Systems

Impacts of 2040 General Plan

The 2019 EIR determined that utilities and service systems impacts from implementation of the General Plan would be less than significant with no mitigation required (Section 20, *Utilities and Service Systems*). Implementation of the Plan would create an increase in residential and commercial development, and thus an increase in jobs and population in Burlingame. The 2019 EIR concludes that existing solid waste and recycling facilities would be sufficient to meet the projected growth under the General Plan. However, the 2019 EIR concludes that future development within the General Plan Area could require expanded water and wastewater facilities to meet the demand from anticipated population growth, including mainline or backbone elements and local connections. The EIR further states that no immediate changes to the system are needed to meet

the demands of immediate growth, as the water and wastewater master plans anticipate growth consistent with the General Plan. To accommodate the level of long-term development allowed by the General Plan, the City will continue to assess demand and to update water and wastewater master plans as needed.

Impacts of the Proposed Project

The proposed project may result in additional housing units on certain parcels, where requested by applicants and approved by the City. However, there would be no changes to the land use or zoning maps and no change to the General Plan boundaries. As discussed in Section 3, Project Description, and shown on Table 4, buildout from the proposed HEU would result in 18,467 total residential units and a population of 42,464. The proposed HEU would increase residential units compared to the 2019 EIR. As such, impacts to utilities would be as follows:

Water

The City purchases all of its potable water from the San Francisco Public Utilities Commission (SFPUC) Regional Water System (RWS). The City of Burlingame has an Individual Supply Guarantee (ISG) from the SFPUC, which totals 5.23 million gallons per day (mgd) (City of Burlingame 2021).⁴ Burlingame's average water demand between 2016 and 2020 totaled 1,221 million gallons per year, which is equivalent to 3.35 mgd, or 64 percent of the city's allotted 5.23 mgd (City of Burlingame 2021).⁵ Water use in the City of Burlingame has decreased due to mandatory water restrictions that were implemented between 2012 and 2016.⁶

The 2020 UWMP identified that the City's population in 2020 was 32,407 (City of Burlingame 2021).⁷ As described in Chapter 3, Project Description, the total population of Burlingame in 2040 is expected to be 42,464 after implementation of the proposed project. This would represent a difference of 10,057 people. Using a conservative estimate of 135 gallons per capita per day, which is the City's target and more than the City's historic per capita use, the additional water demand from the proposed project would be approximately 1.4 mgd (City of Burlingame 2021).^{8,9} The sum of the water demand from 2020 (3.35 mgd) and the additional water demand associated with the proposed project (1.4 mgd) would be 4.75 mgd, which is within the City's allotted 5.23 mgd supply. For this reason and because all future projects would be required to comply with the City's 2020 UWMP, including the City's Water Shortage Contingency Plan, there would be sufficient water supply to accommodate the proposed project and impacts would remain less than significant, the same as what was identified in the 2019 EIR.

Wastewater

The City's Public Works Department services Burlingame's wastewater system. Wastewater flows are carried to a wastewater treatment plant (WWTP) at 1103 Airport Boulevard, which serves the entire city of Burlingame as well as approximately one-third of Hillsborough. The average dry-weather flow of wastewater to the WWTP has remained fairly constant, at approximately 3.0 to 3.5 mgd, which is

⁴ See Page 5.

⁵ See Page 5.

⁶ See Pages 25-26

⁷ See Page 15.

⁸ See Pages 26 and 47.

⁹ $(10,057 \text{ people} * 135 \text{ gpd}) / 1,000,000 \text{ gallons} = 1.4 \text{ mgd}$.

approximately 55 to 64 percent of the facility's 5.5 mgd capacity (City of Burlingame 2021).¹⁰ In 2020, the volume of wastewater collected in the year was 939 million gallons, which is equivalent to 2.6 mgd (City of Burlingame 2021).¹¹ The 2020 volume of wastewater collected is lower than the average dry-weather flow, primarily due to the COVID-19 pandemic (City of Burlingame 2021).¹² Assuming an additional demand of 1.4 mgd wastewater, given the additional water demand, the sum of the wastewater demand would be 4.4 to 4.9 mgd, which is within the City's existing capacity. For this reason, the proposed project's impact would be less than significant and within the City's existing capacity.

Solid Waste

In 2021, the per capita waste disposal in the City of Burlingame was approximately 4.9 pounds per person per day (ppd) of solid waste (California Department of Resources Recycling and Recovery [CalRecycle] 2023a). Using this assumption, the City would be expected to generate approximately 104 tons of solid waste per day in the form of garbage as well as recycling and composting material. The Shoreway Environmental Center is permitted to receive 3,000 tons of refuse per day (Rethink Waste 2023). Once collected and sorted at Shoreway, solid waste is transported to Corinda Los Trancos Landfill, which is permitted to receive 3,598 tons per day of solid waste (CalRecycle 2023). The solid waste that would be generated by the population that would be accommodated by the proposed project represents 3.5 percent and 2.9 percent of the permitted capacity of Shoreway and Corinda Los Trancos Landfill, respectively. As such, Shoreway and the Corinda Los Trancos Landfill would have adequate capacity to serve the proposed project and impacts would be less than significant, the same as was identified in the 2019 EIR.

In summary, since new housing units would be primarily infill development, they would be located in areas with existing utility connections which would result in fewer impacts to utility expansion than if the HEU encouraged housing development outside of the urban area. Therefore, the proposed project would not generate use of water, wastewater, solid waste, and other utility facilities beyond the uses anticipated in the General Plan. As a result, the proposed project would not introduce new impacts or substantially increased impacts related to utilities and other service systems and would be consistent with the impact analysis provided in the 2019 EIR.

Effects and Mitigation Measures

No new or substantially more severe effects would occur to utilities and service systems, and no new mitigation measures are necessary.

Conclusion

Less than Significant Impact (Same as 2040 General Plan)

¹⁰ See Page 62.

¹¹ See Page 62.

¹² See Page 62.

19. Wildfire

Impacts of 2040 General Plan

Since *Wildfire* was added to the 2019 CEQA guidelines as a separate environmental issue area after preparation of the 2019 EIR, the 2019 EIR does not include a separate chapter or section dedicated to analysis of wildfire impacts. However, it does analyze such impacts in Section 11, *Hazards and Hazardous Materials*, and concludes that impacts would be less than significant with no mitigation required. Development in areas susceptible to wildfires has the potential to impact both the new development and nearby existing development if there are no buffers between structures and flammable vegetation and inadequate fire protection services in the vulnerable wildfire areas. However, the city of Burlingame is primarily urbanized and does not contain any mapped Fire Hazard Severity Zones (FHSZ). The nearest Very High FHSZ is located approximately 0.25 mile from the city limits within the town of Hillsborough (California Department of Forestry and Fire Protection 2007). The 2019 EIR determined that the General Plan would not cause significant effects related to wildfire and would not impede the implementation of an emergency response or evacuation plan. Furthermore, the General Plan includes the following policies which would further reduce the risk of wildfire to a less than significant level:

- Policy CS-2.3** Continue to include the Central County Fire Department in the review of development proposals to ensure projects adequately address fire access and building standards.
- Policy CS-2.4** Require that new development projects document the availability of water supplies and infrastructure to meet the fire-suppression needs of the project without compromising existing fire suppression services to existing users.
- Policy CS-2.3** Maintain code enforcement programs that require private and public property owners to minimize fire risks by:
 - Maintaining buildings and properties to prevent blighted conditions.
 - Removing excessive or overgrown vegetation (e.g., trees, shrubs, weeds) in accordance with wildland urban interface clearance requirements.
 - Removing litter, rubbish and illegally dumped items from properties.

Impacts of the Proposed Project

The closest Housing Opportunity Site to a mapped VHFHSZ is located approximately 1.6 miles northeast in Downtown Burlingame; thus, sites where housing is encouraged by the HEU are not near a VHFHSZ. In addition, the immediate surrounding area to where Housing Opportunity Sites are proposed is developed with urban land uses and is generally flat. The proposed project may result in additional housing units on certain parcels. However, development would still occur in the same areas as analyzed in the General Plan; there would be no changes to the land use or zoning maps and no change to the General Plan boundaries. Moreover, since the new housing would be required to be on developed lots with established primary uses and connections to transit and services, they would not require the installation of new infrastructure such as roads, which could exacerbate fire risk. Applications for housing would be reviewed by the Central County Fire Department for compliance with applicable emergency response plans and requirements to reduce fire hazards. Therefore, the proposed project would not introduce new impacts or substantially increase impacts related to wildfire.

Effects and Mitigation Measures

No new or substantially more severe effects would occur to wildfire hazards, and no new mitigation measures are necessary.

Conclusion

Less than Significant Impact

5 Conclusion

As discussed in detail in the preceding sections, potential impacts associated with the proposed project are consistent with potential impacts characterized and mitigated for in the 2019 EIR. Substantive revisions to the 2019 EIR are not necessary because no new significant impacts or impacts of substantially greater severity than previously described would occur as a result of the proposed project. Therefore, the following determinations have been found to be applicable:

- No further evaluation of environmental impacts is required for the proposed project;
- No Subsequent EIR is necessary per CEQA Guidelines Section 15162; and
- This Addendum is the appropriate level of environmental analysis and documentation for the proposed project in accordance with CEQA Guidelines Section 15164.

Pursuant to CEQA Guidelines Section 15164(c), this Addendum will be included in the public record for the 2019 EIR. Documents related to this Addendum will be available at City of Burlingame Community Development Agency Planning Department offices, 501 Primrose Road Burlingame, California 94010.

6 References and Preparers

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