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## 21. ALTERNATIVES

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### 21.1 PURPOSE

Section 15126.6 of the CEQA Guidelines requires an EIR to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The section also states that the discussion of alternatives shall focus on alternatives to the project or its location which can avoid or substantially lessen any significant effects of the project, even if those alternatives would impede to some degree the attainment of the basic project objectives or would be costlier.

Pursuant to Section 15126.6, this chapter describes three alternatives to the Burlingame 2040 General Plan, including the CEQA-mandated No Project Alternative, and compares the impacts of each to those of the proposed General Plan. Pursuant to the CEQA Guidelines, the ability of the alternatives to meet the basic project objectives is also described, and the "environmentally superior" alternative among the three is identified.

### 21.2 RATIONALE FOR ALTERNATIVE SELECTION

In accordance with CEQA Guidelines section 15126.6(a), this EIR does not evaluate every conceivable alternative. A feasible range of alternatives has been evaluated that will allow decision-makers to make a reasoned choice and that meet most of the project objectives. Relevant project objectives from section 3.4 of this EIR are:

#### *Balanced and Smart Growth*

- Allow growth to occur in targeted areas where supportive physical and community infrastructure are available or can readily be provided, and where such growth contributes to the positive qualities and characteristics that define Burlingame.
- Maintain a balance of ownership and rental housing, with opportunities for people of all income ranges to live in Burlingame.
- Base land use decisions on the ability of the multimodal transportation network to support growth.
- Ensure that new commercial, office, and industrial development can accommodate the evolving nature of how buildings are used and business is conducted.

### *Connectivity*

- Ensure provision of a well-defined multimodal transportation network that accommodates a range of travel choices and that connects Burlingame to the region.
- Provide safe, convenient, and comfortable vehicular and pedestrian connections across Highway 101, linking the Bayfront with the rest of the City.
- Develop and maintain safe and easy-to-use bicycle and pedestrian travelways citywide, with an emphasis on providing connections from neighborhoods to local schools, parks, shopping, and entertainment.
- Ensure the provision of “last-mile” connections from transit stations.

## **21.3 ALTERNATIVES CONSIDERED**

While selecting alternatives to be considered for analysis, the City focused on analyzing those alternatives which could potentially reduce the significant unavoidable effects related to the project and which would also achieve project objectives, including the key objective of ensuring provision of a well-defined multimodal transportation network that accommodates a range of travel choices and that connects Burlingame to the region. Since the DEIR analysis has not identified any significant adverse impacts, no specific alternatives are needed to reduce adverse impacts. As a result, only three alternatives are addressed:

- Alternative 1: No Project--Existing General Plan
- Alternative 2: Higher Development Density and Intensity in North Burlingame (120 du/acre to 140 du/acre)
- Alternative 3: No Live/Work Designation in the Northerly One-third of the Rollins Road Corridor

In accordance with CEQA Guidelines section 15126.6(d), the discussion in this chapter of the impacts of the alternatives is less detailed than the discussions in chapters 5 through 20 of the impacts of the 2040 General Plan. Table 21-1 summarizes impacts of the alternatives compared to impacts of the proposed General Plan.

### **21.3.1 ALTERNATIVE 1: NO PROJECT--EXISTING GENERAL PLAN (1969, 1975, 1981)**

#### **Principal Characteristics**

Alternative 1 consists of buildout of the Planning Area in accordance with the existing Burlingame General Plan. The existing General Plan consists of elements that were adopted in 1969, with focused updates in 1975 and 1981. (The Housing Element, which is not included in the current proposed update, has been regularly updated as required by law.) In addition, three Specific Plans have been adopted to implement the General Plan: Downtown (adopted 2010), North Burlingame/Rollins Road (adopted 2004, amended 2007), and Bayfront (adopted 2004, amended 2006 and 2012). Because much of the existing General Plan is over 40 years old and contains little information about build out and land use intensities, Alternative 1 largely represents the existing land use condition in Burlingame. Table 21-1 provides the existing developed acres for residential, office, commercial, industrial, hotel, and institutional land uses.

**Table 21-1: Existing Developed and Proposed Build-Out Summary**

	Dwelling Units		Nonresidential Development (in 1,000 Square Feet)					Pop.	Emp.
	SFR	MFR	Office	Comm'l	Ind'l	Hotel	Inst'l		
<b>Existing Land Use</b>	6,873	6,241	3,882	2,275	3,723	3,192	2,555	29,724	29,879
<b>Proposed Land Use</b>	6,921	9,144	4,749	3,035	4,293	3,208	1,976	36,493	39,610
<b>Change</b>	+48	+2,903	+867	+760	+570	+16	-579	+6,769	+9,731
<b>Percent Change</b>	0.1%	+32%	+18%	+25%	+13%	+0.1%	-29%	+19%	+25%

Source: City of Burlingame, MIG and Hexagon Transportation Consultants, July 2017

Comparing data for existing conditions to 2040 General Plan build out, the comparison shows that the 2040 General Plan would add 48 single family dwelling units (mostly along El Camino Real) and 2,903 multi-family dwelling units, approximately 1,300,000 square feet of office/commercial uses, and 570,000 square feet of industrial use. The potential increase in employment is 9,731 jobs.

As indicated in Table 21-2, the proposed 2040 General Plan does not significantly alter existing land use designations but creates more mixed-use options in areas designated for commercial and industrial use in the current General Plan, including California Drive, Broadway, North Burlingame, and North Rollins Road. The mixed-use designation allows multi-family dwellings to be built close to shopping and regional transportation. The 2040 General Plan focuses on new and revised policies and implementation programs, consistent with regional forecasts and recently adopted City plans and initiatives, as described in chapter 3 (Project Description) of this EIR.

**Table 21-2: Existing and Future Land Use (in acres)**

Land Use Type	Existing	2040 General Plan
Existing Land Use		
Future Land Use		
Community/School <i>Public/Institutional/Parks</i>	265.6	268.88
High Density Residential	35.3	16.93
Industrial & Office Use <i>Innovative Industrial + Live/Work</i>	299.9	286.34
Low Density Residential	1,130.5	1,140.33
Medium Density Residential	49.9	49.9
Medium High Density	117.4	97.20
Preserve	97.6	97.6
Restaurants	28.8	Mixed use/downtown
Sales & Special Service	33.8	Mixed use/downtown
Shopping & Service	59.2	Mixed use/downtown
Waterfront Commercial + hotel/motel + office use <i>Bayfront Commercial</i>	201.7	179.04
<i>Mixed Use (Broadway, California, North Burlingame)</i>		54.18
<i>Downtown Specific Plan</i>		130.22
<b>Total</b>	<b>2,320.00</b>	<b>2,320.00</b>

### **Comparative Impacts and Mitigating Effects**

- (a) **Aesthetics and Visual Resources.** With updated policies related to the design of new development, an emphasis on enhanced visual character, identity, and cohesion, and more emphasis on a pedestrian-, bicycle-, and transit-friendly community, the proposed project would have positive impacts on aesthetics compared to No Project.
- (b) **Agricultural Resources.** Since no agricultural resources exist in the Planning Area, the No Project alternative would have no impacts to these resources.
- (c) **Air Quality.** Because Alternative 1 would result less development, it would result in lower air pollutant emissions and fewer sensitive receptors exposed to toxic air contaminants (TACs), PM<sub>2.5</sub>, and odors. However, under the 2040 General Plan, regulations and policies related to air quality would be implemented for any new projects built in the city. With implementation of existing regulation and policies of the 2040 General Plan, impacts on air quality would be less than significant.
- (d) **Biological Resources.** Since the Planning Area is largely built out and contains an insignificant area of undeveloped land, there are no areas of new development that could significantly impact areas of sensitive biological resources. Areas that do support plant and animal resources are designated for open space uses. Additionally, regulations and policies related to protection of biological resources would be implemented for any new projects built. Therefore, the impacts on biological resources would be similar under the proposed project as it would with No Project.
- (e) **Geology, Soils, and Minerals.** Since the Planning Area is already built out and contains an insignificant area of undeveloped land, no areas of new development would be exposed to geologic hazards, landslides, liquefaction, etc., nor would create soil erosion issues. With no minerals currently being mined, potential impacts on mineral resources would be similar.
- (f) **Global Climate Change and Greenhouse Gas (GHG) Emissions.** Alternative 1 would result in reduced GHG emissions compared to the 2040 General Plan since less development would result. The proposed 2040 General Plan would result in GHG emissions that could exceed the 2030 and 2040 GHG emission targets necessary to fully demonstrate progress and consistency with long-term state GHG reduction goals, even after inclusion of all policies contained within the General Plan. As a result, the existing General Plan would have less impact on GHG than the Proposed Project. However, under the No Project Alternative, the City would still have to demonstrate progress and consistency with long-term state GHG reduction goals. The No Project Alternative would not reduce significant unavoidable GHG impacts. The mitigation measure in this EIR that directs an update of the City's Climate Action Plan would apply to both the Proposed Project and the No Project Alternative.
- (g) **Hazards and Hazardous Materials.** With the application of State and Federal regulations regarding the control of hazardous materials, under both the Proposed Project and No Project alternatives, existing regulations would ensure that residents and local employees

would not be impacted by hazardous wastes or materials, including transport and existing waste sites.

(h) Historic and Cultural Resources. Continued development under the existing General Plan could have greater physical impacts on historic and cultural resources compared to the 2040 General Plan because the existing General Plan does not well address resource protection. The updated Plan includes policies and implementation programs that strengthen the City's commitment to proactive historic resource preservation (see chapter 12 tables).

(i) Hydrology and Water Quality. Alternative 1 could have greater impacts on drainage and water quality compared to the 2040 General Plan. From an engineering standpoint, surface runoff is determined by a parcel's impervious surface area and not by land use or density. Under the existing General Plan, the potential exists for fewer infrastructure improvements associated with new development, with more of the existing drainage system deficiencies remaining in place. Proactive sustainability policies in the 2040 General Plan (e.g., for on-site stormwater retention and natural filtering) would not be implemented as extensively (see chapter 13 tables). With fewer infrastructure improvements and fewer sustainability practices, occupants and buildings within the Planning Area could be exposed to greater flooding risks.

(j) Land Use and Planning. The proposed 2040 General Plan includes numerous policies to ensure that new development would be compatible and integrated with the established land use pattern, and their implementation would be an additional benefit to land use and planning compared to the existing General Plan (see chapter 14 tables).

(k) Noise. The noise analysis addressed in Chapter 15 found that under 2040 General Plan Buildout, noise levels on one roadway segment, caused by increased traffic on the roadways, would increase such that adjacent residences would experience significant unavoidable noise impacts. The roadway segment is on Broadway between El Camino Real and Bernal Avenue. Since there is no change in land use or zoning along the road segment, the increase in traffic noise is not necessarily associated with the General Plan buildout on the roadway segment, rather it is caused by a combination of regional and local growth that results in that segment being easy access to new residential development in the hillside neighborhood west of the road segment. This roadway segment is particularly sensitive to traffic noise because it is predominantly a residential roadway.

As a result, under the No Project Alternative, the impacted roadway segment would still have the potential to experience increased traffic volumes that would cause a concurrent increase in traffic noise. The No Project Alternative would not reduce significant unavoidable noise impacts due to traffic.

(l) Population and Housing. The proposed project provides for additional multi-family residences to be constructed, which helps meet regional housing needs in the Bay Area. This is a more positive impact compared to the housing that would be generated from the existing General Plan.

- (m) Public Services. Although the Proposed Project would increase development of multi-family residences which requires expanded fire protection/emergency medical service, police protection, public schools, libraries, and parks and recreation compared to the existing General Plan. However, through impact fees and increased tax revenues, future development would pay for the additional public services needed to serve development under the 2040 General Plan.
- (n) Transportation and Circulation. For the No Project alternative, trip generation and traffic impacts from new development within the Planning Area would be less compared to the 2040 General Plan due to the lower level of development. The transportation and circulation impacts of this alternative compared to the 2040 General Plan are evaluated in chapter 18 (Transportation and Circulation). Buildout under the existing General Plan would avoid the significant impacts of the 2040 General Plan at one study intersection (see Table 18.5 in chapter 18). However, with mitigation, the impact at the California Avenue and Broadway intersection would be mitigated to less than significant.
- (o) Utilities and Service Systems. This alternative would result in reduced water demand, wastewater generation, and solid waste compared to the 2040 General Plan. However, the EIR analysis did not find any significant impacts related to the ability of existing service providers to serve development under the 2040 General Plan. Additionally, the 2040 General Plan includes policies that require conservation measures to reduce the consumption of gas, electricity, water, and to reduce waste going to landfills.

### **Attainment of Project Objectives**

With fewer housing units, fewer employment opportunities, and more auto-oriented development, Alternative 1: No Project--Existing General Plan would be less effective in achieving the project objectives (listed at the beginning of this chapter) than the proposed project.

### **21.3.2 ALTERNATIVE 2: HIGHER DEVELOPMENT DENSITY AND INTENSITY IN NORTH BURLINGAME (120 DU/ACRE TO 140 DU/ACRE)**

#### **Principal Characteristics**

Alternative 2 assumes adoption of a similar 2040 General Plan, but with increased density allowed in the North Burlingame focus area. Under this alternative, the North Burlingame Mixed Use (NBMU) designation would allow densities up to 140 units/acre, an increase of 20 units/acre relative to the proposed plan. The office FAR would remain at 2.0 and the commercial FAR at 1.0.

The density increase would allow the development of 86 more multi-family units in the North Burlingame area, bringing the capacity up to 701 units from 615 units.

The higher density is still consistent with City goals of creating a high-intensity development node within walking distance of the Millbrae multimodal transit station. Permitted uses would still include retail, service commercial, dining establishments, offices, and high-density residential. Development could occur as mixed-use projects or single-purpose buildings, provided the node

includes a mix of uses. The design, scale, and massing of new buildings would still be required to be sensitive to adjacent lower-intensity residential neighborhoods.

### **Comparative Impacts and Mitigating Effects**

- (a) Aesthetics and Visual Resources. Alternative 2 would have similar impacts to the 2040 General Plan with respect to aesthetics and visual resources since the scale of development would be similar (e.g., multi-story).
- (b) Agricultural Resources. As with the project alternative, this alternative would have no impacts on agricultural resources since none exist in Burlingame.
- (c) Air Quality. Alternative 2 would have similar impacts on air quality to the 2040 General Plan because it only slightly increases residential development potential.
- (d) Biological Resources. Since the area of developed land would not change under this alternative, biological impacts of Alternative 2 would be similar to the Proposed Project.
- (e) Geology and Soils. Since no proposed 2040 General Plan policies to relative to geology and soil resources would be eliminated under this alternative, potential impacts regarding geology and soil resources would be similar to the Proposed Project.
- (f) Global Climate Change and Greenhouse Gas (GHG) Emissions. As with the Proposed Project, Alternative 2 would result in GHG emissions that could exceed the 2030 and 2040 GHG emission targets necessary to fully demonstrate progress and consistency with long-term state GHG reduction goals, even after inclusion of all policies contained within the General Plan. Impacts would be similar to the Proposed Project.
- (g) Hazards and Hazardous Materials. Since no proposed 2040 General Plan policies related to hazards and hazardous materials would be eliminated under this alternative, potential impacts regarding hazards and hazardous materials on would be similar to the Proposed Project.
- (h) Historic and Cultural Resources. Since no proposed 2040 General Plan policies related to historic and cultural resources would be eliminated, potential impacts on historic and cultural resources would be similar to the Proposed Project. Also, the mitigation measure proposed to ensure that paleontological resources are not impacted by development under the 2040 General Plan would apply to Alternative 2.
- (i) Hydrology and Water Quality. Alternative 2 would have similar impacts on drainage and water quality compared to the 2040 General Plan. From an engineering standpoint, surface runoff is determined by a parcel's impervious surface area and not by land use or density. Even with slightly more development, there would be limited change relative to 2040 General Plan conditions since the Alternative affects a limited area and the density increase is small. In addition, the proactive sustainability policies in the 2040 General Plan (e.g., for on-site stormwater retention and natural filtering) would continue to be implemented (see chapter 13 tables).

- (j) Land Use and Planning. Both Alternative 2 and the proposed 2040 General Plan include numerous policies to ensure that new development be compatible and integrated with the established land use pattern. Impact would be similar and less than significant.
- (k) Noise. Buildout under this alternative would result in similar noise generation as under the 2040 General Plan due to the minor increase in dwelling units provided by this alternative. This alternative would not reduce traffic noise impacts on the segment of Broadway between El Camino and Bernal Avenue.
- (l) Population and Housing. Alternative 2 would increase the City's projected population by 237 residents (86 units at 2.75 persons per unit). The higher density units would allow up to 86 additional housing units to be built in the North Burlingame focus area. This would provide a slight increase in options for housing.
- (m) Public Services. This alternative would result in similar impacts on fire protection/emergency medical service, police protection, public schools, libraries, and parks and recreation compared to the 2040 General Plan since the increase in residential yield would be only 86 units.
- (n) Transportation and Circulation. For this alternative, trip generation and traffic impacts from new development within the Planning Area would be similar to the 2040 General Plan because it since the alternative would add only 86 more multi-family dwelling units, and at a location that encourages transit use. Alternative 2 would also implement the substantial improvements proposed by the 2040 General Plan to bicycle, pedestrian, and transit circulation and connectivity (see chapter 18 tables).
- (o) Utilities and Service Systems. This alternative would result in similar water demand, wastewater generation, and solid waste generation compared to the 2040 General Plan given the similar build-out numbers citywide.

### **Attainment of Project Objectives**

Alternative 2 would allow the development of 86 more multi-family units in the North Burlingame area, bringing the capacity up to 701 units from 615 units. The increase in multi-family would strengthen the City's stand on meeting the following project objective to "maintain a balance of ownership and rental housing, with opportunities for people of all income ranges to live in Burlingame."

### **21.3.3 ALTERNATIVE 3: NO LIVE/WORK DESIGNATION IN THE NORTHERLY ONE-THIRD OF THE ROLLINS ROAD CORRIDOR**

#### **Principal Characteristics**

Alternative 3 would remove the Live/Work designation from the General Plan that applies to the northerly one-third of the Rollins Road Corridor. Instead, the designation would be Innovation Industrial, at a maximum FAR of 0.75 for commercial and industrial uses and 3.0 for hospitality uses.

Removal of the Live/Work designation would eliminate the potential for 480 residential units in this area, or about 17% of the total additional multi-family units projected citywide under proposed General Plan land use policy. The Live/Work units are envisioned as providing housing for people who run their own small businesses, such as artists, designers, and small wholesale businesses, among others. Removal of the Live/Work designation would reduce the number of potential new residents in close proximity to the Millbrae multi-modal transit station.

Under the Innovative Industrial designation, permitted uses would include light industrial and warehouse, limited commercial uses, creative industry businesses, design businesses, indoor sports and recreation, and wholesale uses.

### **Comparative Impacts and Mitigating Effects**

- (a) Aesthetics and Visual Resources. Alternative 3 would have similar impacts to the 2040 General Plan with respect to aesthetics and visual resources since the scale of development would be similar to that existing in the North Rollins Road area today.
- (b) Agricultural Resources. Because the North Rollins Road area has no agricultural resources, this alternative, like the Proposed Project, would have no impacts on agricultural resources.
- (c) Air Quality. Alternative 3 could have slightly reduced impacts on air quality due to the reduced level of development and associated vehicle trips.
- (d) Biological Resources. Because the North Rollins Road area has no biological resources, this alternative, like the Proposed Project, would have no impacts on biological resources.
- (e) Geology and Soils. Alternative 3 would result in new construction in the same area as the Proposed Project and would be subject to the same development approaches to avoid exposure to geologic hazards and soil erosion. Impacts would be the same.
- (f) Global Climate Change and Greenhouse Gas (GHG) Emissions. As with the Proposed Project, Alternative 3 would result in GHG emissions that could exceed the 2030 and 2040 GHG emission targets necessary to fully demonstrate progress and consistency with long-term State GHG reduction goals, even after inclusion of all policies contained within the General Plan.
- (g) Hazards and Hazardous Materials. Since no proposed 2040 General Plan policies related to hazards and hazardous materials would be eliminated under this alternative, potential impacts would be similar to the Proposed Project.
- (h) Historic and Cultural Resources. Since no proposed 2040 General Plan policies related to historic and cultural resources would be eliminated, potential impacts on historic and cultural resources would be similar to the Proposed Project. Alternative 3 would also not eliminate the mitigation measure provided to avoid impacts on paleontological resources under the 2040 General Plan.
- (i) Hydrology and Water Quality. Alternative 3 would have similar impacts on drainage and water quality compared to the 2040 General Plan since, from an engineering standpoint,

surface runoff is determined by a parcel's impervious surface area and not by land use or density. In addition, the proactive sustainability policies in the 2040 General Plan (e.g., for on-site stormwater retention and natural filtering) would continue to be implemented (see chapter 13 tables).

- (j) Land Use and Planning. Both Alternative 3 and the proposed 2040 General Plan include numerous policies to ensure that new development would be compatible and integrated with the established land use pattern, and their implementation would be an additional benefit to land use and planning over existing conditions (see chapter 14 tables). Alternative 3 would continue the existing types and patterns of development within the entire Rollins Road planning area.
- (k) Noise. Buildout under this alternative could result in higher noise levels at specific locations due to industrial activity and associated truck traffic. This alternative would not reduce traffic noise impacts on the segment of Broadway between El Camino and Bernal Avenue.
- (l) Population and Housing. Alternative 3 would decrease the projected 2040 population by 816 persons (assuming 1.7 persons per household for live/work units). It would also decrease the projected potential number of multi-family by 480 units, or 17% of the total increase in multi-family units accommodated by the updated General Plan (2,903 units less 480 equals 2,423). The reduced number of multi-family units is still consistent with the needs addressed in the Housing Element (see chapter 16).
- (m) Public Services. Alternative 3 would result in similar impacts on fire protection/emergency medical service, and police protection since new development would need to be served. Impacts on schools, library services, and parks and recreation would be reduced since no new residential units would be produced in the North Rollins Road area.
- (n) Transportation and Circulation. For this alternative, trip generation and traffic impacts from new development within the Planning Area would be similar to the 2040 General Plan because new industrial and commercial development would still be anticipated. Alternative 3 would also implement the substantial improvements proposed by the 2040 General Plan to bicycle, pedestrian, and transit circulation and connectivity (see chapter 18 tables).
- (o) Utilities and Service Systems. This alternative would result in similar water demand, wastewater generation, and solid waste generation compared to the 2040 General Plan since new commercial and industrial development would use these services.

### **Attainment of Project Objectives**

Alternative 3 would reduce the potential number of new multi-family units in Burlingame by 480 and would not create new living opportunities in an area close to the Millbrae multi-modal transit station. In this respect, the alternative would not support the project objective to “base land use decisions on the ability of the multimodal transportation network to support growth.” Further it would reduce the number of units that could help the City meet the objective to “maintain a balance of ownership and rental housing, with opportunities for people of all income ranges to live in Burlingame.”

## 21.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Guidelines (section 15126[e][2]) stipulate, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

The Proposed Project would result in a significant, unavoidable noise impact on Broadway between El Camino Real and Bernal Avenue due to the roadway providing access to new residential units in the hillside neighborhood west of the road segment. None of the three alternatives analyzed would substantially reduce vehicle trips along this roadway and thus would not eliminate these significant, unavoidable impacts.

Additionally, the project would result in significant, unavoidable impacts related to the increase in greenhouse emissions from future development and from the General Plan Update being inconsistent with the 2017 Scoping Plan Update, the 2017 Clean Air Plan and the Plan Bay Area 2040 as they related to reducing GHG emissions. This is due to the City not being able to conclusively demonstrate that implementation of the Burlingame 2040 General Plan, including Policy CC-1.1, would not generate GHG emissions that exceed the City's existing Year 2020 and future Year 2030 and Year 2040 GHG reduction goals. None of the project alternatives would eliminate these significant, unavoidable impacts.

Since the proposed project and Alternatives 2 and 3 have the same impact levels and none would reduce significant unavoidable impacts, the proposed project is considered the superior alternative as it meets all project objectives and is the blueprint that was generated through significant research on land use trends, a series of public workshops generating a lot of public input, and with significant input from the Planning Commission and City Council.