

El Camino Real Roadway Renewal Project

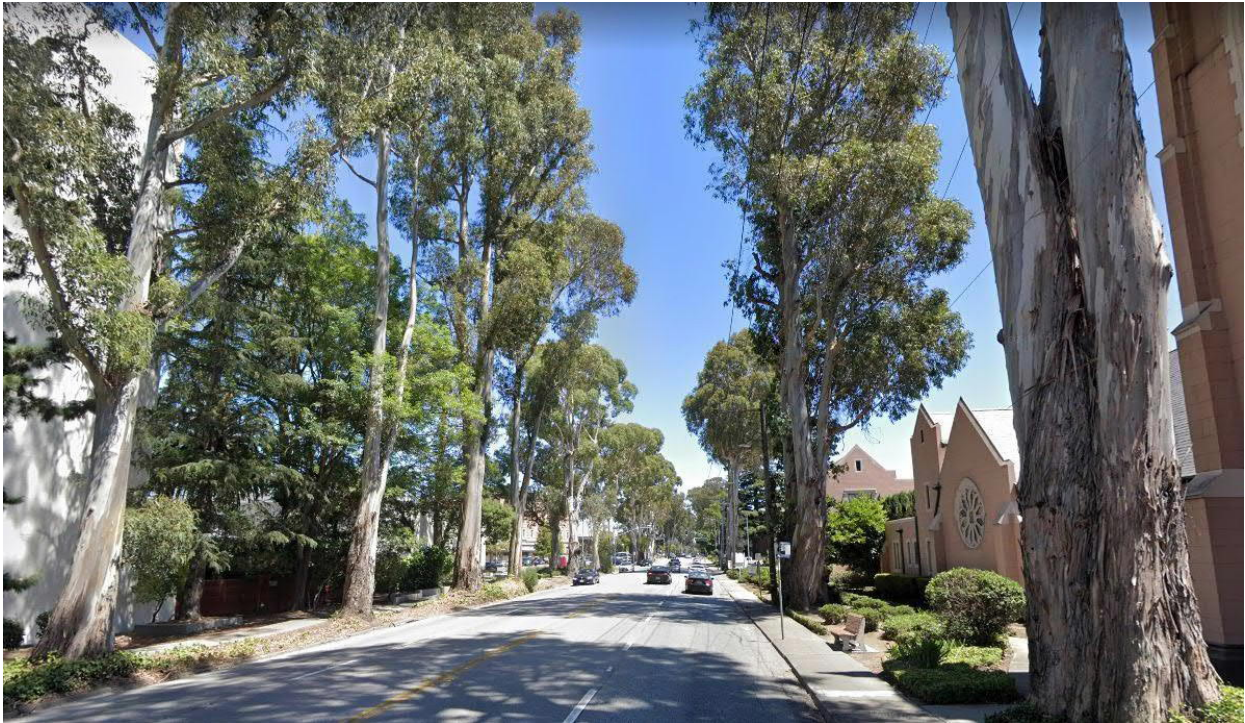
SAN MATEO COUNTY, CALIFORNIA

04-SM-82 – PM 12.3/15.9

EA 04-0K810 / Project ID 0416000142

EA 04-1G900 / Project ID 0400020619

Final Environmental Impact Report/Environmental Impact Statement, Final Section 4(f) Evaluation, and Record of Decision



**Prepared by the
State of California, Department of Transportation**

The environmental review, consultation, and any other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by Caltrans pursuant to 23 USC 327 and the Memorandum of Understanding dated December 23, 2016, and executed by FHWA and Caltrans.



Caltrans

April 2022

General Information about This Document

What's in this document:

The California Department of Transportation (Caltrans), as assigned by the Federal Highway Administration (FHWA), has prepared this Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the proposed project located in San Mateo County, California. Caltrans is the lead agency under the National Environmental Policy Act (NEPA). Caltrans is the lead agency under the California Environmental Quality Act (CEQA). The document tells you why the project is being proposed, what alternatives have been considered for the project, how the existing environment could be affected by the project, the potential impacts of each of the alternatives, and the proposed avoidance, minimization, and/or mitigation measures. The Draft Environmental Impact Report/Environmental Assessment circulated to the public for 53 days between June 10, 2021 and August 2, 2021. Comments received during this period and Caltrans' responses are included in Chapter 5. Elsewhere throughout this document, a vertical line in the margin indicates a change made since the draft document circulation. Minor editorial changes and clarifications have not been so indicated. Additional copies of this document and the related technical studies are available for review at the Caltrans District 4 office at 111 Grand Avenue, Oakland, CA 94612. A link to this document may be found at the following website <https://dot.ca.gov/caltrans-near-me/district-4/d4-projects/d4-san-mateo-82-el-camino-real-project> or www.elcaminorealproject.com.

Alternative Formats:

For individuals with sensory disabilities, this document can be made available in Braille, in large print, on audiocassette, or on computer disk. To obtain a copy in one of these alternate formats, please send an email to Alejandro Lopez at Alejandro.Lopez@dot.ca.gov or call (510) 385-6856. You may also use the California Relay Service 1 (800) 735-2929 (TTY to Voice), 1 (800) 735-2922 (Voice to TTY), 1 (800) 855-3000 (Spanish TTY to Voice and Voice to TTY), 1-800-854-7784 (Spanish and English Speech-to-Speech) or 711.

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FHWA Highway ID No. P082(026)

SCH: 2020059037
04-SM-82 – PM 12.3/15.9
EA No. 04-0K810 & 04-1G900
Project No. 0416000142 & 0400020619

Rehabilitate State Route 82 (El Camino Real) from East Santa Inez Avenue
(Postmile 12.3) in the City of San Mateo to Millbrae Avenue (Postmile 15.9)
in the City of Millbrae

**Final Environmental Impact Report/Environmental Impact Statement and
Final Section 4(f) Evaluation**

Submitted Pursuant to: (State) Division 13, California Public Resources Code
(Federal) 42 USC 4332(2)(C), 49 USC 303, and/or 23 USC 138

THE STATE OF CALIFORNIA
Department of Transportation

Responsible Agencies:
City of Burlingame and California Transportation Commission

04/19/2022

Dina El-Tawansy

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Abstract: The purpose of the project is to preserve and extend the life of the roadway and improve ride quality; improve drainage efficiency; enhance pedestrian access by upgrading infrastructure and bringing it into compliance with Title II of the Americans with Disabilities Act; and enhance user visibility and safety. The Build Alternative would require the removal of approximately 250 trees that contribute to the Howard-Ralston Eucalyptus Tree Rows (a historic resource listed on the National Register of Historic Places) resulting in an adverse effect to this resource. The Build Alternative would require the removal of 300 to 350 trees within the project limits resulting in a moderate-high to high degree of visual change within the project limits. Mitigation measures for the loss of trees include a commitment to replant any trees removed by the project where possible and a formalized Long-Term Management Plan to address needed removals and replacements within the boundaries of the Tree Rows beyond the duration of the project. Tree replanting and the Long-Term Management Plan will follow the Secretary of the Interior Standards for the Treatment of Historic Properties.

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Summary

NEPA Assignment

California participated in the “Surface Transportation Project Delivery Pilot Program” (Pilot Program) pursuant to 23 USC 327, for more than five years, beginning July 1, 2007, and ending September 30, 2012. The Moving Ahead for Progress in the 21st Century Act (MAP-21; P.L. 112-141), signed by President Obama on July 6, 2012, amended 23 USC 327 to establish a permanent Surface Transportation Project Delivery Program. As a result, Caltrans entered into a Memorandum of Understanding (MOU) pursuant to 23 USC 327 (NEPA Assignment MOU) with FHWA. The NEPA Assignment MOU became effective October 1, 2012, and was renewed on December 23, 2016, for a term of five years, which was granted an extension on December 8, 2021 until April 29, 2022. In summary, Caltrans continues to assume FHWA responsibilities under NEPA and other federal environmental laws in the same manner as was assigned under the Pilot Program, with minor changes. With NEPA Assignment, FHWA assigned and Caltrans assumed all of the United States Department of Transportation (USDOT) Secretary's responsibilities under NEPA. This assignment includes projects on the State Highway System and Local Assistance Projects off of the State Highway System within the State of California, except for certain categorical exclusions that FHWA assigned to Caltrans under the 23 USC 326 CE Assignment MOU, projects excluded by definition, and specific project exclusions.

The California Department of Transportation (Caltrans), proposes to rehabilitate the roadway and sidewalks, improve safety and visibility, remedy drainage issues, and upgrade curb ramps to be compliant with the Americans with Disabilities Act (ADA) along a 3.6-mile segment of State Route (SR) 82 (El Camino Real) in San Mateo County. Improving sight distance for drivers and pedestrians; bringing sidewalks and curb ramps into compliance with the ADA; rehabilitating the roadway, and remedying drainage issues will all have safety benefits for drivers and pedestrians.

The proposed project is a joint project by Caltrans and the Federal Highway Administration (FHWA) and is subject to state and federal environmental review requirements. Project documentation, therefore, has been prepared in compliance with both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). Caltrans is the lead agency under NEPA. Caltrans is the lead agency under CEQA. In addition, FHWA’s responsibility for environmental review, consultation, and any other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by Caltrans pursuant to 23 United States Code Section 327 (23 USC 327) and the Memorandum of Understanding dated December 23, 2016, and executed by FHWA and Caltrans.

Some impacts determined to be significant under CEQA may not lead to a determination of significance under NEPA. Because NEPA is concerned with the significance of the project as a whole, often a “lower level” document is prepared for NEPA.

Caltrans prepared a Draft EIR/EIS, which was circulated from June 10, 2021 to August 2, 2021. The public was notified of the availability of the Draft EIR/EIS by a number of methods,

including postings on the Caltrans website, advertisements in local newspapers, and an emailed announcement to interested agencies and individuals. During the review period, Caltrans held a virtual public hearing on Wednesday, July 14, 2021, and an in-person public hearing on Friday, July 16, 2021, to share information about the project and collect comments on the Draft EIR/EIS from interested parties. This Final EIR/EIS was prepared after circulating the Draft EIR/EIS and receiving comments from the public and reviewing agencies.

The project extends along El Camino Real from post mile (PM) 12.3, East Santa Inez Avenue, in the City of San Mateo, to PM 15.9, Millbrae Avenue, in the City of Millbrae (i.e. project limits). The project is in the cities of San Mateo, Burlingame, and Millbrae, and the Town of Hillsborough in San Mateo County.

Caltrans, as assigned by FHWA, is the lead agency under NEPA. Caltrans is also the lead agency under CEQA.

The purposes of the project are to preserve and extend the life of the roadway and improve ride quality; improve drainage efficiency to reduce localized flooding; enhance user visibility and safety; and enhance pedestrian infrastructure and bring it into compliance with Title II of the ADA.

This project is needed to correct roadway deficiencies and improve safety. Specifically, the project is needed due to the following: the overall condition of the pavement is rated as poor due to signs of moderate alligator cracking and very poor ride quality, which indicate roadway structural inadequacy; water ponding and flooding occurs frequently during rain events due to uneven roadway surfaces and inadequate or impacted drainage systems; pedestrian access is impaired due to a lack of updated curb ramps and uneven sidewalks; pedestrian infrastructure is not compliant with state and federal ADA requirements; and existing sidewalks lack accessible pedestrian signals (APS). Countdown pedestrian signals (CPS) and high-visibility striping or current devices as well as pavement markings are missing or outdated.

This project is being considered without and with the inclusion of a design option to permanently relocate above-ground utilities underground for a portion of the project limits.

The project has been programmed under expenditure authorization (EA) 04-0K810 Project identification number (ID) 0416000142 and EA 04-1G900 Project ID 0400020619. These EAs will be combined into EA 04-0K81U Project ID 0420000075 during construction.

Project Impacts

Table S-1 summarizes the effects of the Build Alternative (with and without inclusion of the design option) in comparison with the No Build Alternative. The proposed avoidance, minimization, and/or mitigation measures to reduce the effects of the Build Alternative are also presented. This environmental document evaluates the potential effects of the Build Alternative. A complete description of potential effects and recommended measures is provided in Chapter 3.

Table S-1: Summary of Impacts and Avoidance, Minimization, and/or Mitigation Measures

Affected Resource	Potential Impact: No Build Alternative	Potential Impact: Build Alternative (with or without Design Option)	Avoidance, Minimization, and/or Mitigation Measures
Consistency with State, Regional and Local Plans and Programs	This alternative would not be consistent with the Grand Boulevard Multimodal Transportation Corridor Plan, San Mateo County Bicycle and Pedestrian Plan, City of San Mateo Pedestrian Plan and City of Burlingame Bicycle and Pedestrian Plan because it would not improve bicycle or pedestrian infrastructure.	The Build Alternative would be consistent with most applicable plans and policies. It would be somewhat consistent with the Grand Boulevard Plan, because like the No Build Alternative, it would not narrow traffic lanes to include bike lanes and somewhat consistent with City of San Mateo Pedestrian Plan because new median refuge islands will be investigated during final design for possible inclusion into the Build Alternative.	None.
Community Character and Cohesion	None.	The Build Alternative would improve pedestrian infrastructure providing improved physical space for community interactions but would remove character-defining historic trees resulting in a moderate temporary change to community character and cohesion.	See VIS-2
Environmental Justice	None.	The Build Alternative would include work in eight block groups that meet the criteria of an environmental justice community. Project construction would not disproportionately affect these communities.	None.

Affected Resource	Potential Impact: No Build Alternative	Potential Impact: Build Alternative (with or without Design Option)	Avoidance, Minimization, and/or Mitigation Measures
Utilities/Emergency Services	None.	<p>The Build Alternative would require temporary relocation of overhead electrical lines during construction that would be restored above ground for the Build Alternative without inclusion of the design option and underground with the inclusion of the design option. This work may result in short-term, temporary interruptions of service.</p> <p>Construction would also require temporary lane closures that would be communicated to emergency service providers. The project would not result in long-term effects to utilities or emergency services.</p>	None.
Visual/ Aesthetics	None.	The Build Alternative would require the removal of 300 to 350 trees within the project limits resulting in a moderate-high to high degree of visual change.	<p>VIS-1. The following minimization measures will be incorporated into the final design and construction of the project to minimize effects to trees:</p> <ul style="list-style-type: none"> • Design modifications including, but not limited to, sidewalk meanders around tree trunks, sidewalk ramping over tree roots, and adjustment of driveway conforms to sidewalks and the roadway will be implemented where feasible. • Alternative construction practices including but not limited to hand excavation around structural roots and trenchless drilling will be implemented where feasible. • Trees and vegetation outside of clearing and grubbing limits shall be protected from construction operations, equipment, and materials storage. • Soils within planting areas shall be protected from construction operations, equipment, and

Affected Resource	Potential Impact: No Build Alternative	Potential Impact: Build Alternative (with or without Design Option)	Avoidance, Minimization, and/or Mitigation Measures
			<p>materials storage to maintain suitable growing conditions for existing and replacement street trees. Protective measures shall include avoiding compaction and introduction of materials inconducive to plant growth. Corrective amendments and treatments will be used if planting area soils are damaged during construction.</p> <p>VIS-2. Following completion of roadway construction, replacement street trees shall be planted in roadside areas of the Caltrans' right-of-way consistent with horticultural and maintenance guidelines and safety and sight distance standards. Removed vegetation will be replaced at a 1:1 ratio provided there is adequate space within the roadside areas of the project limits within Caltrans' right-of-way. Replacement planting species and size will be determined during final design.</p> <p>VIS-3. A permanent irrigation system for replacement plantings will be specified during final design and installed prior to replacement street tree planting within the limits of the Howard-Ralston Eucalyptus Tree Rows.</p> <p>VIS-4. A three-year plant establishment period will be specified during final design and implemented immediately following construction of planting and irrigation systems. The three-year plant establishment period will be implemented in accordance with Section 20-4 of the standard specification.</p> <p>VIS-5. A 20-year management plan shall be prepared in consultation with a certified consulting arborist and shall prescribe methods for the long-term care of both retained trees and replacement trees within the limits of the Howard-Ralston Eucalyptus Tree Rows, in order to ensure the sustained health and viability of the trees within the Tree Rows.</p>
Cultural Resources	None.	The Build Alternative would require the removal of approximately 250 trees that	CUL-1. To emphasize the importance of cultural resources and the purpose and necessity of protecting

Affected Resource	Potential Impact: No Build Alternative	Potential Impact: Build Alternative (with or without Design Option)	Avoidance, Minimization, and/or Mitigation Measures
		<p>contribute to the Howard-Ralston Eucalyptus Tree Rows resulting in an adverse effect to this resource. The Build Alternative would require the removal of character-defining features from three historic properties within the project limits resulting in adverse effects to these resources.</p>	<p>them, prior to construction, all construction personnel will be instructed on the protection and avoidance of cultural resources, including state and federal laws regarding cultural resources. This will include a review of the locations of environmentally sensitive areas (ESAs) and what is being protected at each location. Caltrans will establish Environmentally Sensitive Areas (ESA)s for the preservation in place of; 1500-1504 Barroilhet, Burlingame, 770 N. El Camino Real (St. Joseph's Church), San Mateo, and 525 N. El Camino Real (Royal Pines Apartments), San Mateo.</p> <p>CUL-2. Mitigation Measures VIS-1, VIS-2, and VIS-5 (the Howard-Ralston Eucalyptus Tree Rows Management Plan), will be done in accordance with The Secretary of the Interior's Standards (SOIS) for the Treatment of Historic Properties, where possible (see Section 3.1.5.4). To support the development of the Management Plan, Caltrans will host a public meeting during the design phase to solicit input from consulting parties and the public on the tree type selection. The Management Plan will include an inventory of all trees within the Tree Rows, both those that do and do not contribute to the National Register of Historic Places (NRHP) listed property; along with long term treatment, maintenance and protections for the Tree Rows to ensure their long term survival and continued listing on the NRHP. The Management Plan will be completed within two years following the end of construction and will be effective for twenty years following the execution of the management plan. The Management Plan will be developed in consultation with the City of Burlingame and the Burlingame Historical Society.</p> <p>CUL-3. Caltrans will prepare an Historic American Landscape Survey (HALS) for the Howard-Ralston Eucalyptus Tree Rows, and Historic American Building Surveys (HABS) for 1479 El Camino Real, Burlingame,</p>

Affected Resource	Potential Impact: No Build Alternative	Potential Impact: Build Alternative (with or without Design Option)	Avoidance, Minimization, and/or Mitigation Measures
			<p>1265 El Camino Real, Burlingame, and 1041 El Camino Real, Burlingame. Where possible Caltrans will minimize the adverse effects to these properties by utilizing the completed HALS/HABS to ensure that features altered, removed or demolished by the project will be replaced, or reconstructed, where possible, in accordance with the SOIS for the Rehabilitation of Historic Properties.</p> <p>CUL-4. Caltrans District 4 will complete an NRHP Nomination update for the Howard-Ralston Eucalyptus Tree Rows. Recordation of the historic property and completion of the nomination update will occur following the conclusion of construction and will include consultation with the Burlingame Historical Society.</p> <p>CUL-5. Caltrans District 4 will develop an El Camino Real Historic Resource Management Plan, for State Route 82 between PMs 13.00 and 15.20, in the City of Burlingame. The Management Plan will outline the post project conditions, regulatory framework including ties to the City of Burlingame General Plan, identification of historic resources in the corridor, previous survey efforts, and suggestions and recommendations for the future management of the corridor.</p> <p>CUL-6. Utilizing the photographs produced for the HALS document pursuant to CUL-3, in addition to periodic photography completed during and after construction, Caltrans District 4 will document the removal and replacement of trees within the Howard-Ralston Eucalyptus Tree Rows to create an archival record of the project and its effects to the Historic Property. This will be completed in consultation with the City of Burlingame, and the Burlingame Historical Society.</p> <p>CUL-7. Caltrans District 4, in consultation with the City of Burlingame, the Burlingame Historical Society, and local Native American Tribes, will develop a walking tour which will incorporate interpretive panels, wayfinding signs, sidewalk plaques or other signage. The tour will</p>

Affected Resource	Potential Impact: No Build Alternative	Potential Impact: Build Alternative (with or without Design Option)	Avoidance, Minimization, and/or Mitigation Measures
			<p>include the history of local Native American Tribes, El Camino Real, the Howard-Ralston Eucalyptus Tree Rows, Chinese contributions to the area, the City of Burlingame and historic architectural styles found within the project limits. The signage will be installed during construction, and the walking tour completed after construction. The tour outline and interpretive language will be submitted to the SHPO and other consulting parties for review.</p> <p>CUL-8. Caltrans District 4 will coordinate the placement of a time capsule within the Caltrans' right-of-way or other publicly accessible location. Details on placement, when the capsule will be opened, and by whom will be finalized during final design. The procedures and location of the time capsule will be developed in consultation with the Burlingame Historical Society and the City of Burlingame. Input from the cities of Millbrae, Hillsborough and San Mateo, the public, local groups, and schools will be solicited to select items to place in the time capsule. The time capsule will be buried following construction.</p> <p>CUL-9. Caltrans will install two benches within the project corridor constructed of reclaimed lumber from the removed trees within the Howard-Ralston Eucalyptus Tree Rows. Design and placement of the benches will be developed in consultation with the City of Burlingame and the Burlingame Historical Society.</p>
Hydrology and Floodplain	None.	The Build Alternative would not add any impervious area to floodplains within the project limits, and no longitudinal encroachment would occur.	None.
Water Quality and Storm Water Runoff	None.	The Build Alternative would result in 29.5 acres of disturbed soil area but would not involve work in any waterways.	None.

Affected Resource	Potential Impact: No Build Alternative	Potential Impact: Build Alternative (with or without Design Option)	Avoidance, Minimization, and/or Mitigation Measures
Energy	None.	The Build Alternative would require the use of approximately 117,000 gallons of diesel fuel and approximately 4,000 gallons of gasoline fuel for project construction but could potentially reduce indirect energy consumption by encouraging pedestrian travel and reducing the frequency of on-going roadway maintenance.	None.
Natural Communities	None.	The Build Alternative would involve no work in waterways and would not affect riparian corridors within the project limits.	None.
Animal Species	None.	None	None
Invasive Species	None.	The project limits contain blue gum and red gum eucalyptus trees that are identified as invasive. Within the project limits, these trees are not propagating in an invasive manner. The Build Alternative would require removal of some but not all blue gum and red gum eucalyptus trees. Invasive species will not be used for replacement plantings.	None.
Construction Impacts (Noise)	None.	The Build Alternative would require daytime and nighttime construction activities adjacent to residences and a school. These activities are anticipated to be louder than allowable noise limits.	<p>NOI-1. A temporary noise barrier or other control measure will be put in place in front of McKinley Elementary to attenuate noise to less than 52 dBA whenever work is planned within 500 feet of the school during regular school hours. Noise levels will be verified through noise monitoring during construction.</p> <p>NOI-2. The project plans will include a specification for the contractor to create and implement a Noise Control and Monitoring Plan. The plan will require the contractor to implement measures to limit noise levels to comply with 2018 Caltrans Standard Specifications Section 14-8.02 and California Streets and Highway</p>

Affected Resource	Potential Impact: No Build Alternative	Potential Impact: Build Alternative (with or without Design Option)	Avoidance, Minimization, and/or Mitigation Measures
Construction Impacts (continued)	blank	blank	Code Section 216. Noise levels will be verified through noise monitoring during construction.
Relationship Between Local Short-Term Uses of the Human Environment and the Maintenance and Enhancement of Long-Term Productivity	The No Build Alternative would not improve the roadway, drainage facilities, or pedestrian facilities.	The Build Alternative would require a change to visual and cultural resources and would improve the roadway, drainage facilities, and pedestrian facilities.	None.
Irreversible and Irrecoverable Commitment of Resources	None.	The Build Alternative would require the expenditure of fossil fuels, construction materials, and labor in order to improve the roadway, drainage facilities, and pedestrian facilities.	None.
Cumulative Impacts	None.	The Build Alternative would result in significant impacts to visual and cultural resources. However, no reasonably foreseeable planned projects would incrementally contribute to a cumulative impact.	None.
Climate Change	None.	The Build Alternative would result in greenhouse gas emissions during construction, but it would not result in any increase in operational greenhouse gas emissions. The Build Alternative would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	None.

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Transportation and the California State Historic Preservation Officer
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Chapter 1 Proposed Project

1.1 Introduction

The California Department of Transportation (Caltrans), proposes to rehabilitate the roadway and sidewalks, improve safety and visibility, remedy drainage issues, and upgrade curb ramps to be compliant with the Americans with Disabilities Act (ADA) along a 3.6-mile segment of State Route (SR) 82 (El Camino Real) in San Mateo County. Improving sight distance for drivers and pedestrians, bringing sidewalks and curb ramps into compliance with the ADA, rehabilitating the roadway, and remedying drainage issues will all have safety benefits for drivers and pedestrians.

Figure 1.1-1 shows the location of the project, which extends along El Camino Real from post mile (PM) 12.3, East Santa Inez Avenue, in the City of San Mateo, to PM 15.9, Millbrae Avenue, in the City of Millbrae (i.e., project limits). The project is in the cities of San Mateo, Burlingame, and Millbrae, and the Town of Hillsborough in San Mateo County.

The project is included in the Metropolitan Transportation Commission's (MTC's) Bay Area Regional Transportation Plan (RTP), *Plan Bay Area 2040* (Association of Bay Area Governments [ABAG] and MTC 2017a, amended 2020; RTP ID No. 17-10-0025). The project is in the 2019 Transportation Improvement Program (TIP), as revised with Revision Number 2019-41, originally adopted by the MTC on September 28, 2018 and revised on December 11, 2020 (MTC 2018, MTC 2020; TIP ID No. VAR170006). The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) originally approved the 2019 TIP on December 17, 2018.

Caltrans, as assigned by FHWA, is the lead agency under the National Environmental Policy Act (NEPA). Caltrans is the lead agency under the California Environmental Quality Act (CEQA).

1.2 Location and History

SR 82 extends from Interstate 880 (I-880) in San Jose to I-280 in San Francisco. SR 82 is known as El Camino Real throughout much of the San Francisco Peninsula and within the project limits. El Camino Real was a historic mission trail and has long been an important travel way for the communities along the peninsula. It runs roughly parallel to the U.S. 101 freeway, I-280, and Caltrain within the project limits.

From East Santa Inez Avenue (PM 12.3) to Ray Drive/Rosedale Avenue (PM 15.2), El Camino Real is a four-lane, undivided highway with two lanes in each direction. From Ray Drive/Rosedale Avenue to Millbrae Avenue (PM 15.9), El Camino Real is a six-lane divided highway with three lanes in each direction. It provides access to businesses and residences along the roadway. The posted speed limit is 35 miles per hour (mph), except in the school zone near McKinley Elementary School, where it is 25 mph. SamTrans provides bus service along El Camino Real for its Number 397 line and ECR line. Bicycles are permitted on El Camino Real, but there are no designated bicycle facilities within the project limits. Sidewalks are present along the northbound and southbound sides of El Camino Real within the project limits for all areas except the southbound side from Bellevue Avenue to Floribunda Avenue.

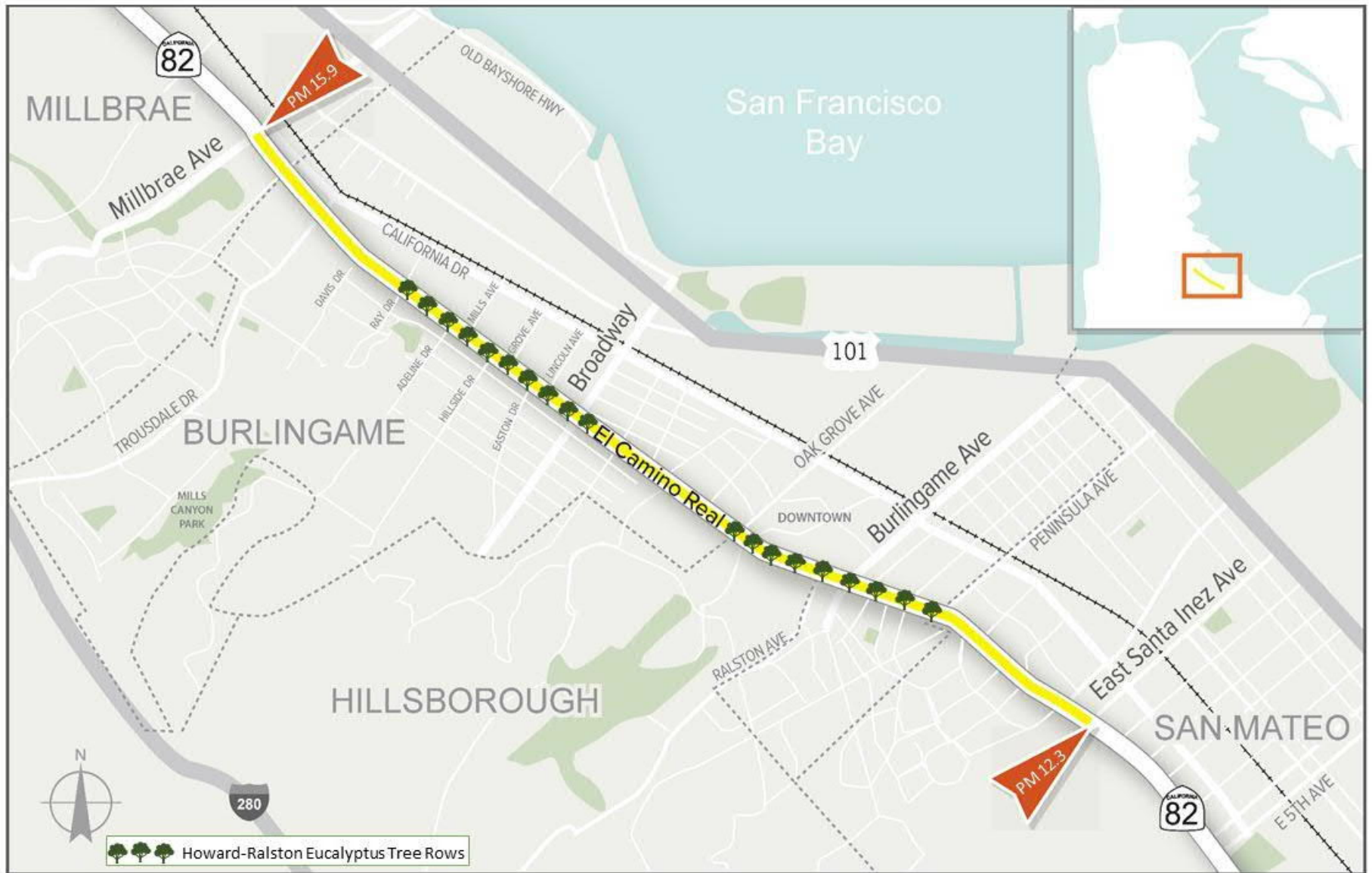


Figure 1.1-1: Project Location

Within the project limits, the Howard-Ralston Eucalyptus Tree Rows, (a historic resource listed on the National Register of Historic Places [NRHP]) extends along El Camino Real from Peninsula Avenue to Ray Drive/Rosedale Avenue in the City of Burlingame.

Between 2014 and 2017, Caltrans undertook preliminary investigations to evaluate the condition of the roadway, sidewalks, and other infrastructure (Caltrans 2014, Caltrans 2016a, Caltrans 2017a). Caltrans then included funding for these items in its State Highway Operation and Protection Program (SHOPP).

In 2017, Caltrans participated in a series of meetings and workshops as part of the Burlingame El Camino Real Task Force. The Task Force was comprised of members of the City of Burlingame’s Historical Society, Beautification Commission, Traffic, Parking, and Safety Commission, as well as the City’s arborist and public works representative, City residents, and some City council members (Burlingame 2018). The Task Force reviewed a two-block section of El Camino Real from Palm Drive to Sanchez Drive and made recommendations for Caltrans to consider when developing the project in terms of trees, sidewalks, roadway, and drainage facilities. These recommendations have been reviewed carefully by members of the Project Development Team (PDT) and the project has been designed to incorporate recommendations where feasible.

1.3 Purpose and Need

1.3.1 Project Purpose

The purposes of the project are to:

- Preserve and extend the life of the roadway and improve ride quality;
- Improve drainage efficiency to reduce localized flooding;
- Enhance user visibility and safety; and
- Enhance pedestrian infrastructure and bring it into compliance with Title II of the Americans with Disabilities Act (ADA).

1.3.2 Project Need

This project is needed to correct roadway deficiencies and improve safety. Specifically, the project is needed due to the following:

- The overall condition of the pavement is rated as poor due to signs of moderate alligator cracking and very poor ride quality, which indicate roadway structural inadequacy.
- Water ponding and flooding occurs frequently during rain events due to uneven roadway surfaces and inadequate or impacted drainage systems.
- Pedestrian access is impaired due to a lack of updated curb ramps and uneven sidewalks.
- Pedestrian infrastructure is not compliant with state and federal ADA requirements.

- Existing sidewalks lack accessible pedestrian signals (APS). Countdown pedestrian signals (CPS) and high-visibility striping or current devices as well as pavement markings are missing or outdated.
- During Caltrans' collaborations with the El Camino Real Task Force, community leaders emphasized safety improvements as an important consideration in the project area.

1.3.2.1 Pavement Condition

The condition of the existing pavement was evaluated within the project limits in 2015. The roadway throughout the project limits shows signs of cracking with the segment from Broadway to just north of Ray Drive/Rosedale Avenue being the worst. Up to 38 percent of the pavement is cracked in the portion of the roadway that is frequently impacted by tires. This is often due to repetitive traffic loads and can be an indication of a weak or wet subgrade below the roadway (Caltrans 2009). See Figure 1.3.2-1 for an example of this type of cracking. See Figure 1.3.2-2 for the typical layers of an asphalt roadway. Based on the pattern of cracking, it is likely that the subgrade is damaged and all of the roadway layers above the subgrade are impacted.



Figure 1.3.2-1: Roadway Cracking

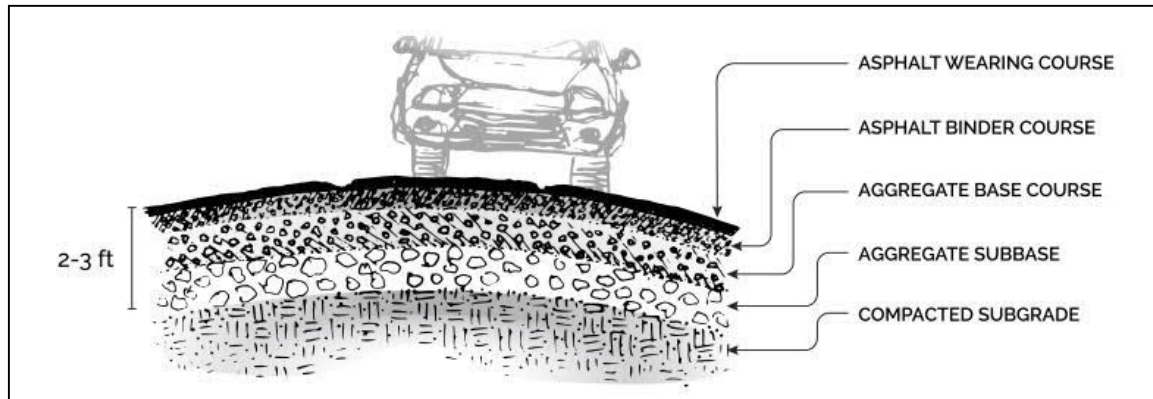


Figure 1.3.2-2: Typical Pavement Structural Section

In addition, the pavement contains ruts that range in size from 0.10 to 0.20 inch deep (the larger being about the size of a pea). Ruts are depressions or grooves in the roadway that prevent a smooth drive surface and can also fill with water and contribute to hydroplaning in wet conditions (FHWA 2018). Ruts are shown in Figure 1.3.2-3. The deepest ruts within the project limits were recorded between Ralston Avenue and Broadway.



Figure 1.3.2-3: Roadway Rutting

Lastly, the International Roughness Indicator (IRI) score within the project limits ranged from approximately 300 to 450 inches per mile. Roughness is a measure of the irregularities in pavement that contribute to poor ride quality. Specifically, IRI measures the total vertical movement a vehicle's body would experience if driven over a 1-mile segment at 50 mph. Pavement with an IRI score higher than 170 inches per mile is considered to provide poor ride quality (Caltrans 2019a). Rough pavement has been found to impact vehicle speed, fuel consumption, and tire wear for individual vehicles (Abulizi et al. 2016). The roughest sections of road were recorded between Ralston Avenue and Broadway. Only surface maintenance such

as pothole filling has taken place within the project limits. Therefore, the underlying damage to the roadway structure persists.

The existing pavement condition is considered in major roadway distress per the Caltrans Design Information Bulletin 79 and cannot be corrected with pothole repair, minor roadway resurfacing, or pavement overlay (Caltrans 2019b).

1.3.2.2 Drainage

Within the project limits, there are three issues that contribute to poor drainage. The first is the presence of old, undersized clay storm water pipes. The pipes are only 12 inches in diameter. This diameter makes it difficult to clean sediment out of the pipes that has built up over time. In addition, many of the existing pipes have been cracked or broken by tree roots.

The second issue that contributes to poor drainage is flow line disruption. The flow line is the line in a gutter in which water is intended to flow. When the ground settles or tree roots lift the pavement, like in many places within the project limits, it can disrupt the flow of water, creating dams and puddles. The flow line is also disrupted when sidewalks and curb ramps experience settling. If curb ramps become lower than drain inlets, water will pond there instead of going into the drain. This causes water to back up on to the roadway. See Figure 1.3.2-4 for an illustration of this. This is a persistent problem throughout the project limits.

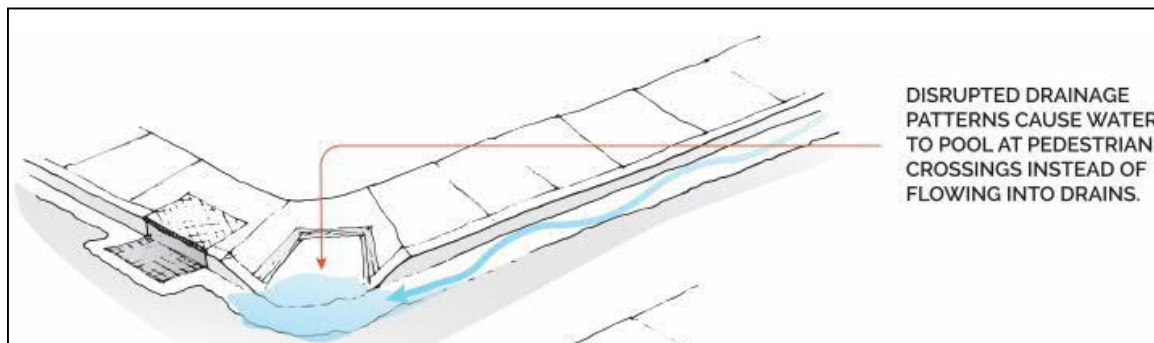


Figure 1.3.2-4: Flow Line Disruptions

The third issue that contributes to poor drainage is the existing drainage inlets themselves. Within the project limits, some drainage inlets are located higher than the surrounding low-lying pavement, causing pooling and flooding on the roadway, such as in Figure 1.3.2-4. Often the drainage inlets have not moved but nearby pavement has settled causing these low spots to form. In addition, some drainage inlets are not connected underground to one another. In these locations, inlets fill up during a rain event and there is no way for the water to get to other nearby inlets, except along the roadway. Therefore, water “bubbles up” out of the drain and floods the roadway. See Figure 1.3.2-5 for an example.

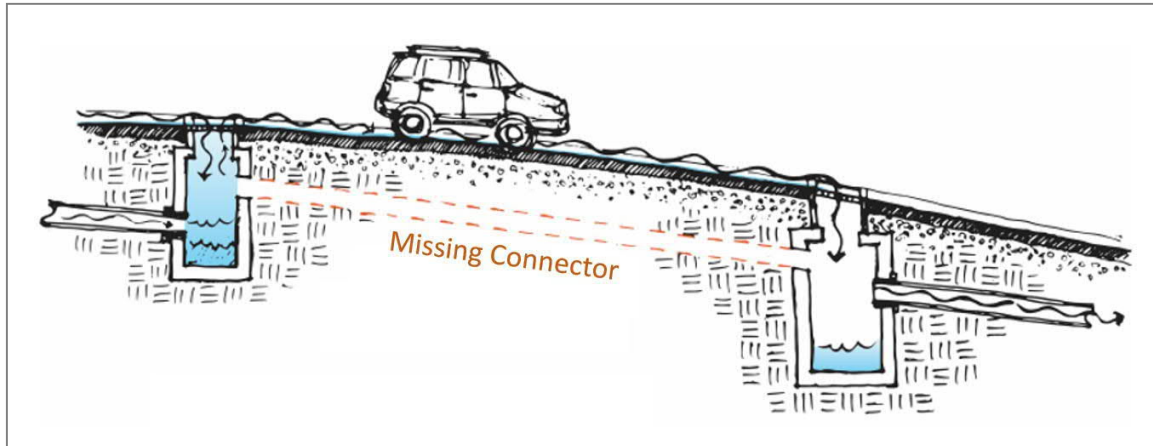


Figure 1.3.2-5: Drainage Inlet Bubble Up

All these drainage issues are present within the project limits and contribute to frequent, localized flooding on the roadway. This impairs the movement of all users during rain events.

1.3.2.3 Pedestrian Infrastructure

Within the project limits, the existing pedestrian infrastructure varies greatly. Sidewalks are present along the northbound and southbound sides of El Camino Real except the southbound side from Bellevue Avenue to Floribunda Avenue. However, existing sidewalks within the project limits frequently do not meet the current state and federal standards for ADA compliance. Many sidewalks have narrow widths, and many are severely damaged from tree roots and trunks encroaching into them (see Figure 1.3.2-6), which impacts pedestrian movement. Pedestrian movement is also impeded by trees, posts, and utility poles within the existing sidewalks.



Figure 1.3.2-6: Narrow sidewalk between a tree and a retaining wall along El Camino Real between Carmelita Avenue and Sanchez Avenue

Within the project limits, the existing curb ramps and crosswalks also do not meet current state and federal standards for ADA compliance. Some intersections lack crosswalks at all legs of the intersection, which may necessitate out-of-direction travel or additional street crossings for people walking along and across El Camino Real. The landing widths, cross-slopes, flare slopes, ramp slopes, and curb heights of many of the existing curbs are not ADA compliant. These features are shown in Figure 1.3.2-7 (Snohomish County Public Works 2016). Many existing curb ramps are placed diagonally to the crosswalks as opposed to perpendicular or parallel. Diagonal curb ramps feature crosswalks that do not extend directly from the curb ramp and, therefore, force pedestrians descending the ramp to proceed into the intersection before turning to the left or right to cross the street at the crosswalk. This results in reduced maneuverability and increased pedestrian interactions with turning vehicles. Some curbs and crosswalks also currently lack detectable warning surfaces, pedestrian push buttons, APS, CPS, and high-visibility striping. Implementation of these pedestrian features would create infrastructure accessible to all users. Examples of APS and CPS are shown in Figure 1.3.2-8.

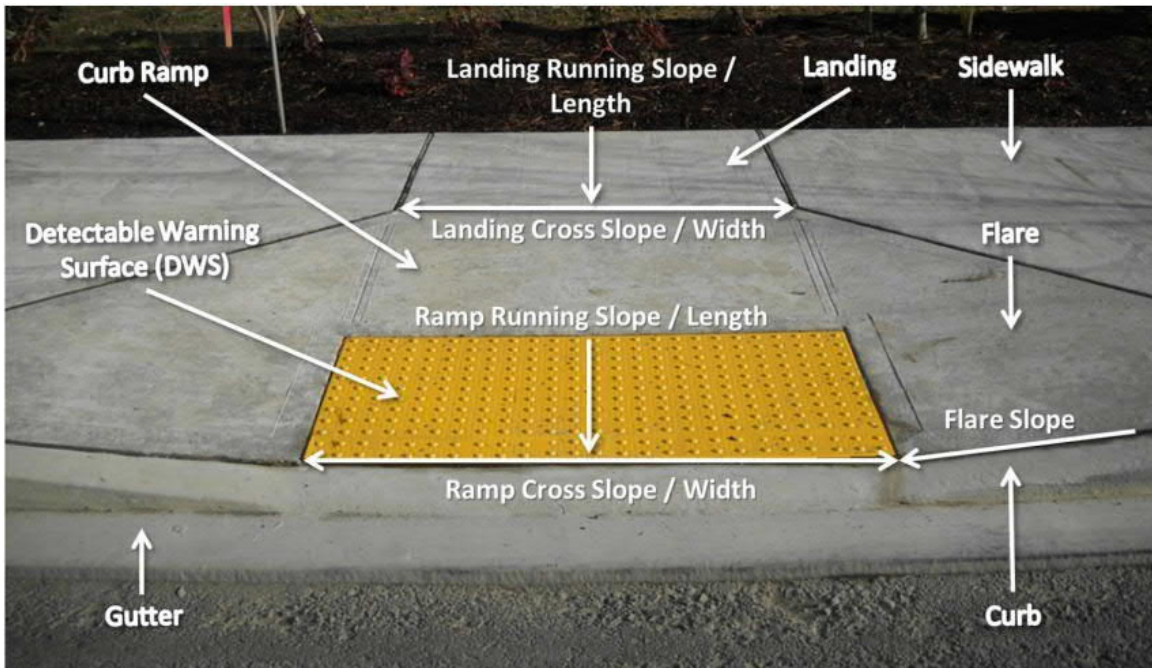


Figure 1.3.2-7: Curb Ramp Elements



Figure 1.3.2-8: Accessible Pedestrian Signal (left) and Countdown Pedestrian Signal (right)

1.3.3 Independent Utility and Logical Termini

FHWA regulations (23 Code of Federal Regulations [CFR] 771.111 [f]) require that the action evaluated:

1. Connect logical termini and be of sufficient length to address environmental matters on a broad scope.

2. Have independent utility or independent significance (be usable and require a reasonable expenditure even if no additional transportation improvements in the area are made).
3. Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.

Logical termini are defined as (1) rational end points for a transportation improvement, and (2) rational end points for a review of the environmental impacts. Independent utility, or independent significance, is defined as being a usable and reasonable expenditure even if no additional transportation improvements in the area are made.

The project limits were chosen based on the pavement condition along El Camino Real. In 2010, the area south of East Santa Inez Avenue (PM 12.3) was repaved and in 2003, the area north of the Murchison Drive (PM 15.8) was rehabilitated and are in generally good condition. The project limits extend to PM 15.9 to include striping and ADA curb ramps north of Murchison Drive. Therefore, the 3.6-mile gap is being considered for rehabilitation of the roadway. This is supported by the pavement condition of this section of roadway compared to the areas beyond the north and south limits. In addition, deficiencies in curb ramps and APS are present from East Santa Inez Avenue (PM 12.3) to Millbrae Avenue (PM 15.9). Sidewalks to the south and to the north of the project limits meet ADA requirements. Drainage improvements are being proposed as required by a rehabilitation project and are not being undertaken on their own. Since pavement condition is the primary factor determining logical termini, the project limits are rational end points for both the transportation improvement and the review of the environmental impacts.

The project would not require any additional transportation improvements within the project limits to meet the purpose and need. Accordingly, the project is a usable and reasonable expenditure. The project would also not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.

Chapter 2 Project Alternatives

2.1 Project Description

This section describes the proposed action and the project alternatives developed to meet the purpose and need of the project, while avoiding or minimizing environmental impacts. The alternatives include a No Build Alternative and one Build Alternative (that includes an option to maintain the existing location of above-ground utilities and an option to underground utilities).

The project is located in San Mateo County on El Camino Real (SR 82) from East Santa Inez Avenue (PM 12.3) to Millbrae Avenue (PM 15.9). The project limits extend for 3.6 miles through the cities of San Mateo, Burlingame, and Millbrae, and the Town of Hillsborough. Within the project limits, El Camino Real is a four-lane undivided highway from PM 12.3 to 15.2 and is a six-lane divided highway from PM 15.2 to 15.9.

The purposes of the project are to preserve and extend the life of the roadway and improve ride quality; improve drainage efficiency to reduce localized flooding; enhance user visibility and safety; and enhance pedestrian infrastructure and bring it into compliance with Title II of the ADA.

This project is needed to correct roadway deficiencies and improve safety. Specifically, the project is needed due to the following: the overall condition of the pavement is rated as poor due to signs of moderate alligator cracking and very poor ride quality, which indicate roadway structural inadequacy; water ponding and flooding occurs frequently during rain events due to uneven roadway surfaces and inadequate or impacted drainage systems; pedestrian access is impaired due to a lack of updated curb ramps and uneven sidewalks; pedestrian infrastructure is not compliant with state and federal ADA requirements; and existing sidewalks lack accessible pedestrian signals (APS). Countdown pedestrian signals (CPS) and high-visibility striping or current devices as well as pavement markings are missing or outdated.

The following sections describe the Build Alternative and design option under consideration for the project.

2.1.1 Build Alternative

Under the Build Alternative, the roadway would be rehabilitated, and drainage and pedestrian infrastructure would be upgraded. There would be no change to the number of travel lanes on El Camino Real. See Figure 2.1.1-1 for a typical cross-section of the Build Alternative.

Under the Build Alternative, the roadway would maintain its existing 44- to 46-foot width including two 10- to 11-foot-wide travel lanes in each direction. All permanent improvements would occur within existing state and city/town right-of-way.

Roadway Rehabilitation

To address structural inadequacy of the roadway, the entire pavement structural section (as shown in Figure 1.3.2-2) would be removed and reconstructed between East Santa Inez (PM 12.3) and Murchison Drive (PM 15.8). To do this, construction crews would use saw cutters, excavators, and jack hammers to remove the existing pavement, concrete structures, and bus

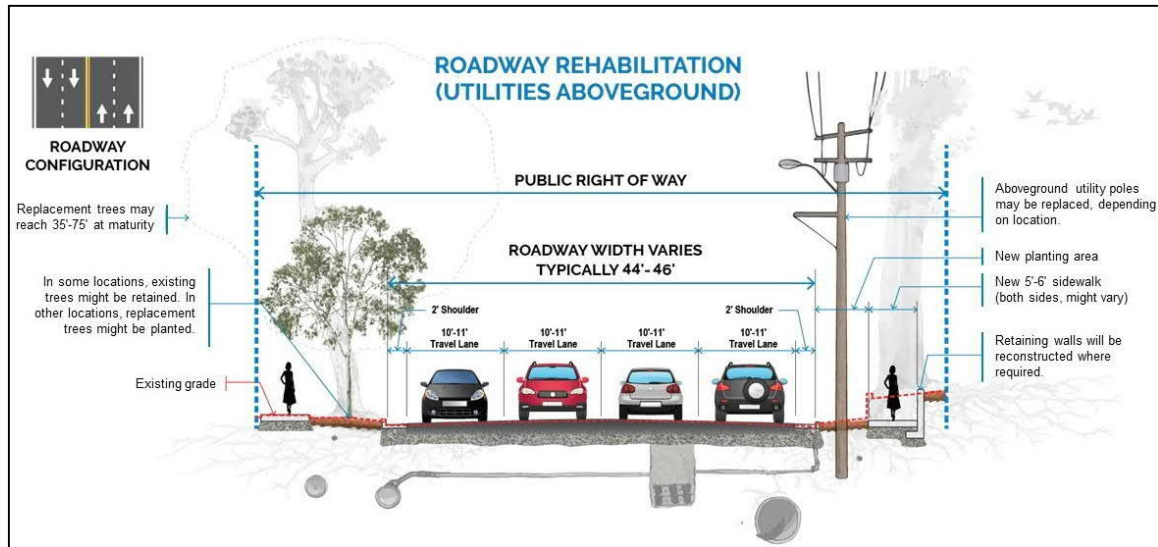


Figure 2.1.1-1: Build Alternative

pads. The existing subgrade would be re-compacted with vibratory compactors and the road base would be reconstructed and graded. Construction crews would use cement trucks to install Portland cement concrete pavement and other concrete surfaces and an asphalt paving machine would be used to install a new layer of asphalt flexible pavement. This would be followed by roadway re-striping.

Drainage Improvements

There are 79 existing roadway drainage inlets within the project limits. A total of 34 new drainage inlets would be installed, and 25 existing drainage inlets would be modified or relocated to accommodate changes to existing curb ramps. In addition, all existing reinforced concrete pipes, clay pipes, and metal pipes smaller than 18 inches would be replaced with 18-inch polyvinyl chloride pipes. These improvements would minimize roadway ponding caused by the existing deficiencies. Drainage work would require the use of excavators and backhoes for trenching and vibratory compactors for pipe backfill.

Pedestrian Improvements

All existing sidewalks within the project limits from East Santa Inez Avenue (PM 12.3) in the City of San Mateo to Dufferin Avenue (PM 15.3) in the City of Burlingame would be upgraded as part of the project. This coincides with the portion of the project limits that is an undivided, four-lane roadway. The upgraded sidewalks would range from 5 feet to 6 feet in width and would be compliant with ADA standards. The sidewalks north of Dufferin Avenue in the cities of Burlingame and Millbrae are already compliant with ADA standards and would not be changed as part of the project. The only portion of the project limits that currently lacks sidewalks is along the southbound side of El Camino Real from Bellevue Avenue to Floribunda Avenue. There are existing crosswalks at both the El Camino Real/Bellevue Avenue intersection and the El Camino Real/Floribunda Avenue intersection to assist pedestrians in navigating to the northbound side of the roadway and continuing along El Camino Real. No new sidewalk is being proposed between Bellevue Avenue and Floribunda Avenue in order to preserve existing street trees at this location.

The Build Alternative would not change the number of intersections within the project limits. All existing crosswalks would be marked with high-visibility paint (comprised of one layer of thermoplastic and two layers of glass beads) following project construction. Within the existing intersections, 183 curb ramps at 43 intersections in the project limits (from East Santa Inez Avenue [PM 12.3] to Millbrae Avenue [PM 15.9]) would be upgraded to meet ADA standards. In addition, pedestrian hybrid beacons would be installed at the unsignalized intersections of Bellevue Avenue, Willow Avenue, and Palm Drive.

There are 20 signalized intersections within the project limits. The installation of touch-free APS and CPS is proposed for installation at each of these signalized intersections. A final decision on installation will be made during final design based on coordination with local agencies and further review of potential conflicts (such as utilities or other concerns) at each intersection.

The APS would provide an audible and vibrating signal designed to make street crossings safer for people who are blind, deaf, or who have low vision. These signals provide information in non-visual formats (e.g., audible tones, speech messages, and/or vibrating surfaces) designed to increase awareness for all pedestrians, which can lead to fewer pedestrian-related collisions with vehicles. The APS would be integrated into the pedestrian pushbutton detector, so the audible tones and messages would come from the pushbutton housing and have a pushbutton locator tone and tactile arrow. These electronic buttons are actuated by pedestrians to change traffic signal timing to accommodate pedestrian crossings. Locator tones would be used to help pedestrians with visual impairments find the pushbuttons that also activate CPS. CPS inform pedestrians of the number of seconds remaining in the pedestrian crossing time and reduce the number of pedestrians caught in the crosswalk at the end of the cycle.

Pedestrian hybrid beacons would be located at uncontrolled intersections where there is no traffic signal. A pedestrian hybrid beacon is a traffic control device designed to help pedestrians safely cross busy or higher-speed roadways at midblock crossings and uncontrolled intersections. The beacon head consists of two red lenses above a single yellow lens. The lenses remain "dark" until a pedestrian desiring to cross the street pushes the call button to activate the beacon. The signal then initiates a yellow to red lighting sequence consisting of steady and flashing lights that directs motorists to slow and come to a stop. The pedestrian signal then flashes a WALK display to the pedestrian. Once the pedestrian has safely crossed, the hybrid beacon again goes dark.

At the request of local jurisdictions, during the design phase, Caltrans will coordinate with the public and the cities of San Mateo, Burlingame, and Millbrae, and the Town of Hillsborough on the inclusion of additional bicycle and pedestrian crossing markings and other surface- or pavement-level improvements at all El Camino Real intersections within the project limits. Such improvements will include:

- Realignment of existing crosswalks
- Advance stop pavement markings
- Adjusting signal timing to provide for a leading pedestrian interval
- Consideration of signal timing adjustments
- Prohibition of right turns on red lights if feasible

The exact locations of these improvements will be determined during final design.

Demolition of existing pavement for sidewalk replacement and curb ramp upgrades would require the use of pavement breaking equipment (e.g., jackhammers, hoe-rams, etc.). New concrete would require the installation of concrete formwork using hand tools and concrete pouring using concrete pumps.

Associated relocation, adjustment, and upgrading of traffic signal poles, light poles, signs, utility cabinets, fire hydrants, and other utilities (such as gas, fiber optic cables, sewer and water lines) may be required to conform to infrastructure upgrades within the scope of the project.

Traffic signal and lighting upgrades would require the use of drilling machines for the construction of new signal foundations and cranes for the placement of new signal and lighting poles and mast arms.

Transit Improvements

The San Mateo County Transit District (SamTrans) provides bus service along El Camino Real for its Number 397 line and ECR line. As part of the project, all existing bus stops within the project limits will be replaced in kind. SamTrans is currently performing a speed and reliability study of their transit service along El Camino Real. Dependent on the findings of the study, Caltrans will work with SamTrans to adjust the number and location of bus stops within the project limits. Caltrans will coordinate with SamTrans to identify priority locations for additional transit enhancements (such as bus shelters) within the scope of the project.

Utilities

Under the Build Alternative, utility poles would be removed and relocated at various locations during construction to conform to infrastructure upgrades. There would be no change in the services provided to customers following project construction, however there could be short-term minor disruptions during construction.

2.1.1.1 Design Option to Underground Utilities

A design option is being evaluated for the Build Alternative. With this design option, the existing electrical transmission, telecommunications, and cable TV lines that currently run along poles above the roadway would be relocated underground from Barroilhet Avenue (PM 12.9) to Ray Drive/Rosedale Avenue (PM 15.2) in the City of Burlingame. See Figure 2.1.1-2 for a typical cross-section of this design option.

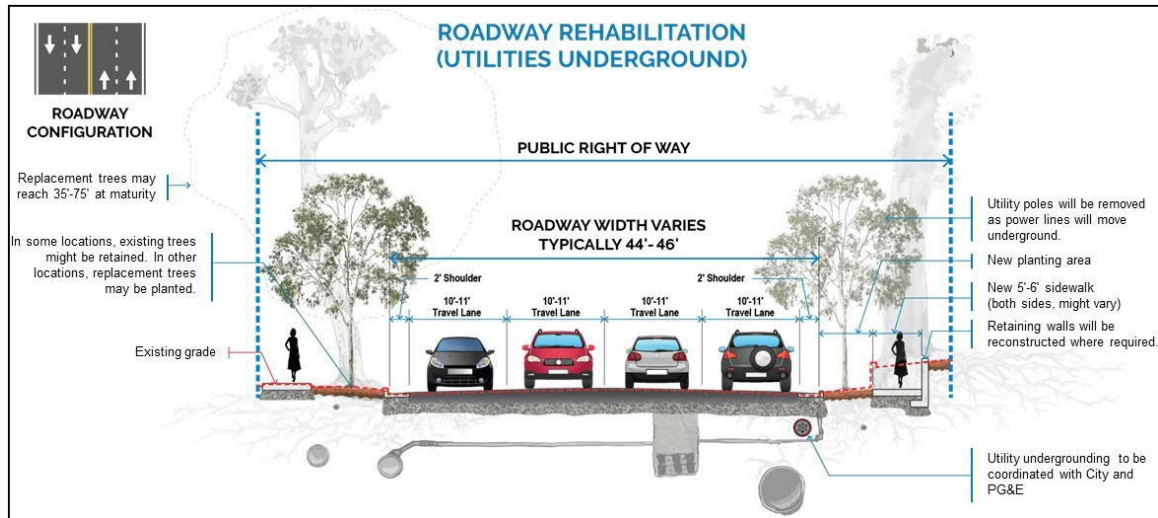


Figure 2.1.1-2: Design Option to Underground Utilities

Utility undergrounding is being considered to minimize conflicts between overhead utilities and tree replanting as well as at the request of the City of Burlingame. Current Pacific Gas and Electric Company (PG&E) standards require that replacement trees placed near existing distribution lines be no more than 25 feet tall at maturity, 50 feet from power lines, and 10 feet from power poles (PG&E 2021). Therefore, the existing aboveground utilities limit the potential number and size of replacement plantings along El Camino Real within the project limits.

Utility undergrounding efforts are being funded, lead, and coordinated by the City of Burlingame. On June 17, 2019, the Burlingame City Council established the El Camino Real Underground Utility District to initiate proceedings for implementing the proposed utility undergrounding. The City of Burlingame estimates this work will cost \$25-30 million if done as part of the Build Alternative (Goldman 2020). The City of Burlingame will coordinate with Caltrans Design on the placement of utility infrastructure to avoid impacts to the environment. Final approval of utility undergrounding would depend upon agreements between the City of Burlingame, Caltrans, PG&E, and other utility providers. This design option would be constructed as long as necessary funding and approvals are secured by the City of Burlingame. Should funding and approvals not be secured in time to meet the project schedule, the Build Alternative would be constructed without this design option. Since the ability to move forward with this design option is beyond the decision-making capability of Caltrans, it does not represent a distinct Build Alternative. However, it is being evaluated for potential effects to the environment throughout this EIR/EIS and the public, stakeholders, and agencies are invited to provide comments on this action.

2.1.1.2 Project Construction

Prior to the start of construction, a public outreach campaign will be developed that will include the designation of a Public Information Officer (PIO) who will act as a single point of contact to inform local jurisdictions and the public on all issues related to implementation of the project, including the construction schedule, traffic control, temporary changes in traffic circulation, utility relocation and temporary outages, and construction staging. This information

will be made available to residents and business owners in the project area. The PIO will be available to address any project complaints during construction.

The following activities and components are anticipated as part of project construction.

Construction Lane Closures and Detours

Lane and shoulder closures would be required for project construction such as reconstructing the roadway, curb ramps, and sidewalks. Construction activities are anticipated to occur both during daytime and nighttime hours. Appropriate temporary traffic control devices and barriers (e.g., k-rails, cones, etc.) will be used to protect the construction site from public traffic through the various stage of construction. The project would be phased such that the roadway would be reduced to one lane in each direction for a period of approximately three months at each location within the project limits. Construction crews would move from one end of the project limits to the other in stages. Total project construction is anticipated to take no more than three years. Residential and business access would be maintained during construction.

Right-of-Way

No permanent right-of-way acquisitions are proposed for the project. City permits from the cities of San Mateo, Burlingame, and Millbrae, and the Town of Hillsborough would be required to reconstruct curb ramps. Temporary construction easements (TCEs) would be required on 32 properties to reconstruct the edges of driveways to conform with the new project features and to rebuild crumbling retaining walls that are currently located within Caltrans' right-of-way. The depth of each TCE into private property would vary but would range from one to ten feet. The length of each TCE along El Camino Real would vary by location. In order to construct the upgraded pedestrian infrastructure, Caltrans would utilize all state right-of-way lands within the project limits. Any privately owned features (e.g., landscaping, landscape retaining walls, staircase, fencing) within state right-of-way that conflict with the project would be removed.

Water Quality

No work is expected in daylighted or culverted waterways that cross El Camino Real or at drainage outfalls. The project is anticipated to result in a disturbed soil area (DSA) of 29.5 acres. Therefore, a Storm Water Pollution Prevention Plan (SWPPP) will be prepared before project construction, and SWPPP requirements will be inspected and maintained during construction. The SWPPP requires temporary best management practices (BMPs) for hazardous materials storage and soil stockpiles, inspections, maintenance, worker training, and release containment to prevent runoff into storm water collection systems or waterways. These measures are designed to protect human health and the environment. BMPs proposed for the project include soil stabilization, sediment control, tracking control, and non-storm water management. BMPs will be determined during final design.

The project design also includes permanent BMPs to avoid the potential for project-related storm water discharges to substantially alter drainage patterns, violate water quality standards, or substantially degrade water quality. Permanent BMPs proposed for the project include bioretention or biofiltration devices. The placement of each will be determined during final design.

Tree Trimming, Removal, and Replacement

The Build Alternative requires existing street trees to be trimmed or removed during construction, including both historic trees and newer replacement trees that contribute to the Howard-Ralston Eucalyptus Tree Rows. Caltrans has extensively studied trees within the project limits to determine how many may need to be removed. A detailed description of this evaluation is presented in Appendix F. Caltrans has identified trees that are incompatible with the project scope due to one of the following conditions:

- The trunks of some trees overlap with the location of a proposed project feature such as a sidewalk or drainage feature that cannot be relocated and needs to be upgraded as part of the project.
- The structural root systems of some trees are within areas of extensive excavation required to construct project improvements, such as curb and gutters, driveways, and curb ramps. For instance, stabilizing roots of some trees extend over curbs and into the edge of the roadway. In order to reconstruct the pavement structural section and curb and gutter, these roots would be unavoidably severed during construction permanently damaging the tree's health and structural stability.
- Some trees exhibit signs of greatly compromised health, including a lack of vigor and/or the presence of Sulphur fungus, suggesting they lack the resiliency to survive moderate excavation required for construction activities. An example would be sidewalk replacement in areas where the existing sidewalk has been moderately to severely displaced and where alternative construction techniques are not possible. Work within the root zones of these trees would negatively impact their already compromised health.

An estimated 300 to 350 of the approximately 700 trees in the project limits would be removed, including approximately 250 trees that contribute to the Howard-Ralston Eucalyptus Tree Rows. Caltrans identified trees to be removed due to the above-listed conditions; also, a further clarification of the trees designated for either preservation or removal has been provided in a Tree Preservation Assessment by an experienced professional arborist. At the request of several commenters, Caltrans' preliminary tree removal mapping, which was included as an appendix to the Visual Impact Analysis (VIA) and made available during the public comment period, is attached as Appendix J. The Tree Preservation Assessment is attached as Appendix K.

Tree removal would be done using industry standard practices including various hand saws and pruners, chain saws, woodchippers, and excavators. Extremely large trees may require cranes to safely lower large branches and sections of trunks. All project activities will be done in compliance with the Migratory Bird Treaty Act.

Replacement planting is described in Section 3.1.5.4.

2.1.1.3 Other Construction Activities and Requirements

This project contains a number of several standardized project measures which are employed on most, if not all, Caltrans projects and were not developed in response to any specific environmental impact resulting from the project. These measures are addressed in more detail in the Environmental Consequences sections in Chapter 3. The construction contractor will be required to follow all standard requirements and procedures to be included during detailed design, specifications, and permits or other authorizations.

The following are examples of standardized project measures that will be implemented as part of the project.

Construction Lighting

Construction activities adjacent to residential areas will limit all construction lighting to within the area of work and avoid light trespass through directional lighting, shielding, and other measures as needed.

Transportation Management Plan

During the final design phase, a Transportation Management Plan (TMP) will be prepared in accordance with Caltrans requirements and guidelines to minimize the construction-related delays and inconvenience for travelers, residents, and businesses within the project limits. The TMP will include details about the project's construction hours as well as address the potential traffic impacts as they relate to lane closures and other traffic handling concerns associated with construction of the project. The TMP will include:

- Distribution of press releases and other public outreach necessary to notify local jurisdictions, agencies, and the public of upcoming lane closures and expected delays;
- Coordination with California Highway Patrol (CHP) and local law enforcement on contingency plans;
- Use of portable changeable message signs and CHP Construction Zone Enhanced Enforcement Program where possible to minimize delays.

Access will be maintained for emergency response vehicles.

Hazardous Materials

The long-term use of the existing roadway facility and presence of previous commercial sites adjacent to the roadway provides the opportunity for contaminated soils and groundwater to be encountered during project construction. During the final project design phase, a Preliminary Site Investigation (PSI) will be performed in accordance with current Caltrans guidance to investigate hazardous materials concerns related to soil, groundwater, and building materials within the project limits and will include required measures for managing hazardous materials encountered during project construction. These measures shall be incorporated in the final project design and would address the potential adverse effects to human health and the environment (if any) that could result from the disturbance of hazardous materials in order to protect human health and the environment.

Depending on the results of the PSI and the presence of hazardous materials that exceed regulatory thresholds, potential measures could include the following:

- ADL-contaminated soils exceeding California hazardous waste thresholds shall be managed in accordance with the DTSC's 2016 Soil Management Agreement for Aerially Deposited Lead-Contaminated Soils.
- Lead compliance plans for ADL-contaminated soils and pavement markings containing lead shall be prepared in accordance with the Caltrans Standard Special Provisions and

implemented by the project construction contractor(s) to ensure compliance with OSHA and Cal/OSHA worker safety regulations.

- Groundwater from dewatering of excavations shall be stored in Baker tanks during construction activities and characterized to determine the appropriate treatment requirements for discharge and disposal. The extracted groundwater shall be collected and managed for disposal/treatment in compliance with local and state regulations.
- All loose and peeling lead-based paint and asbestos-containing material shall be removed by a certified contractor(s) in accordance with local, state, and federal requirements. All other hazardous materials will be removed from structures in accordance with Cal/OSHA regulations.
- Asphalt concrete and Portland cement concrete grindings shall be reused in accordance with the San Francisco Bay RWQCB's (2007) guidance to protect water quality or transported off-site for recycling or disposal.
- Job site perimeter air monitoring when the project work disturbs regulated lead-contaminated soils. Air monitoring program requirements will be defined in Section 14-11.08F Air Monitoring of Standard Special Provision 14-11.08 Regulated Material Containing Aerially Deposited Lead.
- Protective measures when excavating, loading, and transporting contaminated soils such as before any excavation work begins, the contractor will be required to submit an excavation and transportation plan for review and acceptance by the state's resident engineer, as stated in Standard Special Provision 14-11.08 Regulated Material Containing Aerially Deposited Lead, subsection D (3).
- Safety in the transport of contaminated soils, as addressed in subsection 14-11.08J Material Transportation, which requires practices such as removing and containing loose soils from truck exteriors before leaving the construction zone.

Preparation of the PSI is anticipated to cost approximately \$100,000. Based on the constituents of concern identified in Section 3.2.3.3, management and disposal of lead-contaminated, hazardous-waste soils during construction is anticipated to cost approximately \$500,000.

Erosion Control and Construction Discharges

The following standard practices for erosion control and construction discharges will be part of the project:

- Installation of silt fencing, fiber roll, and/or check dam;
- drainage inlet protection;
- concrete wash-out;
- street sweeping; and
- job site management for sediment control.

Air and Noise Standards

The project's construction contract will include the 2018 Caltrans Standard Specification 7-1.02C which require contractors to certify they are aware of and will comply with all California Air Resources Board (ARB) emissions reduction regulations and 14-9.02 which requires all work to be performed in accordance with air-pollution-control rules, regulations, ordinances, and statutes, including those provided in Government Code § 11017 (Public Contract Code §-10231).

In addition, the following measures will be included in the construction contract to minimize construction impacts to nearby residences and businesses.

- Regular vehicle and equipment maintenance.
- Recycle non-hazardous waste and excess materials, where possible, to reduce offsite disposal.

Discovery of Cultural Resources

If cultural materials are discovered during construction, all earth-moving activity within and around the immediate discovery area will be diverted until a qualified archaeologist can assess the nature and significance of the find.

If human remains are discovered, California Health and Safety Code (H&SC) Section 7050.5 states that further disturbances and activities shall stop in any area or nearby area suspected to overlie remains, and the County Coroner contacted. If the remains are thought by the coroner to be Native American, the coroner will notify the Native American Heritage Commission (NAHC), who, pursuant to PRC Section 5097.98, will then notify the Most Likely Descendent (MLD). At this time, the person who discovered the remains will contact Kathryn Rose, Caltrans Archaeology Branch Chief (510 504-1937) so that they may work with the MLD on the respectful treatment and disposition of the remains. Further provisions of PRC 5097.98 are to be followed as applicable.

Protection of Existing Cultural Resources

For construction activities where there is the potential for inadvertent direct impacts to NRHP-listed or eligible resources that qualify for protection under CEQA, Caltrans BMPs include designating Environmentally Sensitive Area (ESA) fencing or other forms of delineation to protect these resources. A qualified architectural historian will prepare an ESA Action Plan. The Plan will include requirements to protect these resources where there is the potential for indirect construction impacts. ESA fencing or other markings will be placed, where needed, around historic properties, protecting resources from inadvertent project-related effects. The ESAs will also be delineated in the plans, specifications, and estimates (PS&E) package. No project-related activities (e.g., grubbing, staging, equipment parking, etc.) shall occur within the ESAs.

- 1500-1504 Barroilhet Avenue, Burlingame. This property is located on the corner of Barroilhet Avenue and El Camino Real. The building elevation along El Camino Real is in close proximity to where new sidewalks will be constructed. ESA fencing will be

placed along this elevation to protect the building from any inadvertent construction impacts.

- 770 N. El Camino Real, San Mateo, St. Joseph’s Church. This building sits on the corner of El Camino Real and State Street. The elevation along El Camino Real is in close proximity to where new sidewalks will be constructed. ESA fencing will be placed along this elevation to protect the building from any inadvertent construction impacts.
- 525 N. El Camino Real, San Mateo, Royal Pines Apartments. This building sits on the corner of El Camino Real and Clark Drive. Portions of the landscaping along this corner are contributing features to the NRHP eligibility of this resource. ESAs will be needed due to the proximity of these contributing elements to sidewalk construction. ESA fencing will be placed along these features to protect the building from any inadvertent construction impacts.

Design Standards

Caltrans establishes and supports the consistent application of highway design standards to ensure optimal safety for the traveling public and those who work to construct, operate, and maintain the State Highway System. Exceptions to these standards are considered when the proposed design deviates from the standard design features presented in the *Caltrans Highway Design Manual*.

Caltrans Project Development Procedures Manual Chapter 21 defines Boldface design standards as those that have the approval for design exceptions. Underlined design standards are important also, but allow greater flexibility in application to accommodate design constraints or be compatible with local conditions on resurfacing or rehabilitation projects.

Within the project limits, the existing roadway contains nonstandard design elements that do not meet current design standards. The following roadway elements would be designed to current Caltrans standards:

- Curb ramps to be upgraded to current ADA standards;
- Width of sidewalks;
- Curb and gutter;
- Improve sight distances; and
- Type of striping and signage.

Exceptions from boldface and underlined design standards would be considered based on engineering judgment to minimize adverse environmental impacts.

2.1.1.4 Estimated Project Cost and Funding

Project funding is provided by the 2018 State Highway Operation and Protection Program (SHOPP) under 201.120 Pavement Resurfacing/Rehabilitation SHOPP Roadway Preservation. The project is anticipated to cost \$150-180 million. This cost does not include undergrounding as described in Section 2.1.1.1.

The project has been programmed under expenditure authorization (EA) 04-0K810 Project identification number (ID) 0416000142 and EA 04-1G900 Project ID 0400020619. These EAs will be combined into EA 04-0K81U Project ID 0420000075 during construction.

2.1.2 No Build Alternative

Under the No Build Alternative, no modifications would be made to El Camino Real other than routine maintenance. The existing configuration as shown in Figure 2.1.2-1 would be maintained. Deteriorated roadway conditions would continue to be addressed through filling potholes and other short-term surface remedies. The sidewalks and existing drainage facilities would not be upgraded. Localized flooding due to damaged and outdated drainage infrastructure would continue to be present on the roadway. Under this alternative, the utilities would not be relocated underground.

Existing trees that line El Camino Real would continue to age and may eventually decline in health. Any existing historic trees (part of the Howard-Ralston Eucalyptus Tree Rows) that must be removed due to safety or routine maintenance projects would continue to be replaced with elm trees, per the existing agreement between Caltrans and the State Historic Preservation Officer (SHPO).

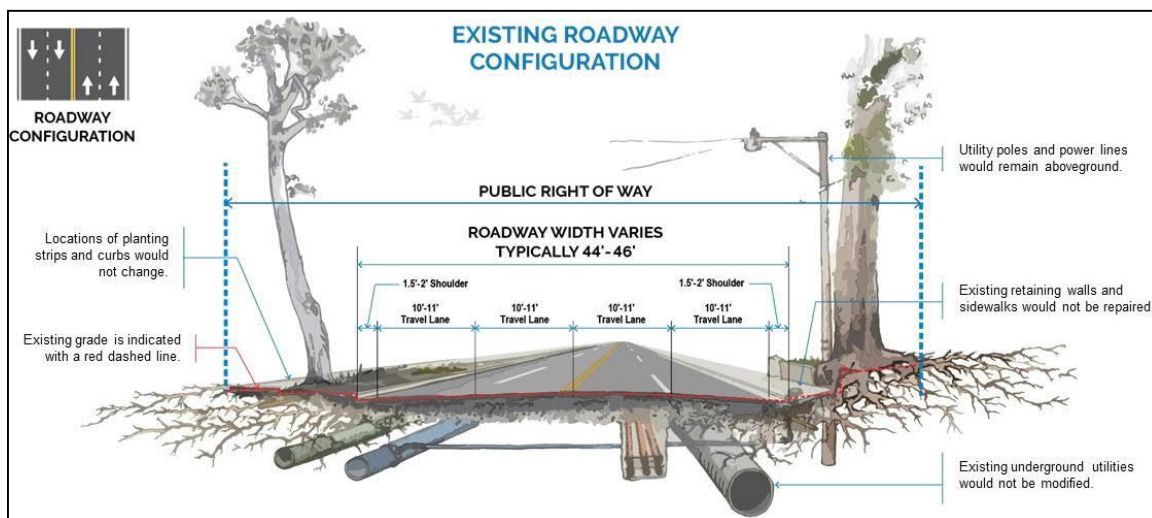


Figure 2.1.2-1: No Build Alternative

2.1.3 Final Decision Making Process

After the public circulation period of the Draft EIR/EIS, all comments were considered, and Caltrans selected a preferred alternative and made a final determination of the project's effect on the environment. The Build Alternative has been identified as the Preferred Alternative, as discussed in Section 2.1.4.

Caltrans will certify that the project complies with CEQA, prepare findings for all significant impacts identified, prepare a Statement of Overriding Considerations for impacts that will not be mitigated below a level of significance, and certify that the findings and Statement of Overriding Considerations have been considered prior to project approval. Caltrans will then file a Notice of Determination with the State Clearinghouse that will identify that the project

will have significant impacts, mitigation measures were included as conditions of project approval, that findings were made, and that a Statement of Overriding Considerations was adopted. With respect to NEPA, and as assigned by FHWA, Caltrans circulated the Draft EIR/EIS for review and consideration. Caltrans has documented and explained its decision to select the preferred alternative. This decision also takes the public comments, the project impacts and mitigation measures into consideration. The Record of Decision (ROD) is attached to this document in Appendix G.

2.1.4 Identification of a Preferred Alternative

The PDT identified the Build Alternative as the Preferred Alternative on August 23, 2021. The following summarizes the reasons for choosing the Build Alternative over the No Build. The Build Alternative would best meet the need and purpose of the project over the No Build Alternative.

While Caltrans received many public comments, no new substantive information was received leading to the identification of new alternatives that meet the scope, need, and purpose of the project, or of new or more severe environmental impacts than were disclosed in the Draft EIR/EIS (see Chapter 5 for public comments and Caltrans' responses).

Also, no new information was received to substantially change Caltrans' environmental commitments (Appendix D) or environmental mitigation plan (Appendix F). Thus, on August 23, 2021, the PDT identified the Build Alternative as the Preferred Alternative for the following reasons.

- The Build Alternative would best meet the need and purpose of the project over the No Build Alternative.
 - The Build Alternative would preserve and extend the life of the roadway and improve ride quality by removing the existing pavement and subgrade and reconstructing it to current standards.
 - Compared to the No Build, the Build Alternative would improve drainage efficiency and reduce localized flooding by replacing existing drainage inlets, installing new drainage inlets, and replacing existing substandard drainage pipes.
 - The Build Alternative would enhance user visibility, safety, and pedestrian infrastructure by inclusion of the following elements:
 - All existing sidewalks would be upgraded to be brought into compliance with Title II of the ADA.
 - All existing crosswalks would be marked with high-visibility paint comprised of one layer of thermoplastic and two layers of glass beads.
 - APS and CPS are proposed for installation at 20 intersections from Poplar Avenue to Millbrae Avenue and pedestrian hybrid beacons would be installed at the intersections of Bellevue Avenue, Willow Avenue, and Palm Drive.

- The Build Alternative incorporates reasonable and appropriate avoidance, minimization, and mitigation measures and provides opportunities to further minimize environmental impacts during the PS&E, construction, and post-construction phases.

2.1.5 Alternatives Considered but Eliminated from Further Discussion prior to Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS)

The following alternatives were considered and analyzed during the project initiation phase and early stages of the Project Approval and Environmental Document (PA&ED) phase. Other than specific components of alternatives that were incorporated into previous projects or the Build Alternative, these alternatives were ultimately rejected and withdrawn from further study for the reasons described below.

2.1.5.1 Road Diet (with and without utilities undergrounded) (Traffic Systems Management [TSM] and Traffic Demand Management [TDM] Alternative)

Throughout the early part of the PA&ED phase and during environmental scoping, the Project Development Team (PDT) considered road diet alternatives with and without undergrounding utilities. These alternatives would have converted the existing four-lane configuration from Peninsula Avenue (PM 12.95) to Ray Drive/Rosedale Avenue (PM 15.2) in the City of Burlingame to a two-lane configuration with a center turn lane. The curb and gutter would have been shifted three feet toward the center median on either side allowing for a wider area for vegetation adjacent to the roadway. Relocation of the curb and gutter would have narrowed the roadway from the existing 44- to 46-foot width to 36- to 38-foot width. These alternatives did not propose including bicycle lanes and narrowing the roadway width permanently would preclude bicycle lanes in the future on El Camino Real within the project limits.

Relocation of the curb and gutter would have altered the drainage flow line requiring replaced storm water pipes to be installed at the new flow line. Existing pipes would have been abandoned in place. Where storm water pipes would not have required replacement, modifications to the drainage system would have been made to connect to any relocated pipes.

Because this alternative would have resulted in only one through-lane of traffic in each direction from Peninsula Avenue (PM 12.95) to Ray Drive/Rosedale Avenue (PM 15.2), this alternative would have required bus pull outs at 21 bus stops (10 northbound and 11 southbound). The bus pull outs would have allowed buses to pull clear of the lane of traffic while stopped to drop off and pick up passengers. Bus pull outs would have been 10 feet wide and 75 feet long with a 125-foot taper at the entry and a 225-foot taper at the exit. At bus pull out locations, the existing roadway width would have been widened.

This alternative was considered by the PDT to try to minimize tree removal, thereby reducing significant impacts to the environment. It was evaluated in the project's technical studies. By abandoning the existing curb and gutter in-place and creating a new curb and gutter three feet toward the center of the roadway, there could not only be more room for replanting trees but also construction impacts to existing trees could have potentially been reduced, allowing more of the existing trees to be retained. After a thorough review of this alternative, the PDT came to the following conclusions.

Reducing the number of through-lanes from two lanes to one lane in each direction would require adding bus pull outs to the roadway in order to allow SamTrans buses to clear the travel lane. This alternative was evaluated to the same standards as the Build Alternative and was found to cause a substantial increase in vehicle delays and congestion during the PM peak hour in the cities of Burlingame and San Mateo (Caltrans 2020a). This alternative would also have resulted in reduced speeds and degradation of level of service at 24 intersections within the project limits in the AM peak hour and 32 intersections in the PM peak hour. The greatest traffic degradations would have been in the northbound direction during the PM peak hour, where individual delays would have increased by more than 11 minutes and average speeds would have been reduced by 13 miles per hour. In addition, this alternative would not have accommodated traffic growth projected for the cities within the project limits. Even with the inclusion of the bus pull outs, the increased congestion would also have impacted bus service within the project limits.

This alternative would have resulted in a 2 percent decrease in the number of trees being removed for this project overall and a 5 percent decrease in the number of trees being removed that contribute to the Howard-Ralston Eucalyptus Tree Rows. However, this reduction is not enough to decrease any significant effects to the environment from tree removal. These alternatives also have the potential to create additional significant effects to the environment from increased congestion with the potential to increase greenhouse gas emissions. Therefore, the PDT decided to eliminate it from further consideration.

2.1.5.2 SM 82 Relocation Alternative

During the PA&ED phase, the PDT considered relinquishing the existing SR 82 corridor to the cities of Burlingame, Millbrae, San Mateo, and the Town of Hillsborough and moving the alignment to an alternate route. This alternative was considered to provide a facility that is less deteriorated (i.e., has better drainage, visibility, roadway condition, closer to meeting ADA standards, etc.), thereby leaving the existing facility in place, in the hopes of avoiding impacts to the historic resources. There is a logical alternative route to the current SR 82. This route would start at East Poplar Avenue in the City of San Mateo; heading north from its current alignment, proceed east on East Poplar Avenue, then left (north) on San Mateo Avenue; continue on California Drive, turn right (east) on Broadway, turn left (north) on Rollins Road, turn left (west) on to Millbrae Avenue, then turn right (north) back to the current SR 82 alignment. Southbound would be the reverse. The route realignment could also begin at 3rd Avenue in the City of San Mateo, this would result in an even longer route segment on 2-lane residential streets compared to East Poplar Avenue, however. This alternative would require extensive new agreements and right-of-way to be acquired by Caltrans.

This alternative was considered primarily to attempt to avoid impacts to the Howard-Ralston Eucalyptus Tree Rows. However, the reasons for rejecting this alternative are as follows:

Under Streets and Highways Code § 73, existing SR 82 cannot be relinquished to local jurisdictions until Caltrans has placed the existing highway (including pavement, culverts, curbs, and drains) “in a state of good repair.” This would require rehabilitation of the existing pavement structural section, installation of new drainage inlets and modification of existing drainage inlets, and the replacement of substandard drainage pipes with new pipes. Such work would result in the same potentially adverse impacts the SM 82 Relocation Alternative is

seeking to minimize and avoid, including the removal of a substantial number of trees from the Howard-Ralston Eucalyptus Tree Rows. Also, Caltrans identified additional potential historic resources along the alternative route that could similarly be impacted as historic resources would be on the existing route due to infrastructure upgrades. Therefore, the PDT decided to eliminate it from further consideration.

2.1.5.3 Extended Phased Construction

In response to public scoping comments, the PDT considered extending the proposed industry standard construction timeline to reduce the temporary visual effects of tree removal by slowly replacing the trees over an extended period of time. The PDT considered the alternative as a staging plan that could remove and replace some trees prior to construction, some during construction, and some after construction as well as evaluating reconstructing the project in small segments over time to allow replanted trees to grow prior to commencing the next segment of construction.

However, trees replanted in the pre-construction planting phase would have sub-optimal growing conditions. These trees would also be subject to damage and further soil compaction when construction activities do occur. Trees replanted during construction activities could benefit from installation of new soil systems and be installed at the end of construction to reduce likelihood of damage, leaving sections bare during the construction phase. Trees replanted after construction would similarly benefit from soil systems and be protected from construction activities.

Under this alternative, the resulting canopy in the corridor would be expected to be less consistent and vigorous than under the standard practice to remove trees in advance of work and replant all trees at the end of construction because standard practice would enable installation of large-scale soil systems to benefit all replacement trees within the project limits. While this alternative may reduce sensitivity to tree loss if trees were replaced in stages, it wouldn't diminish or avoid effects to the environment, particularly to the Howard-Ralston Eucalyptus Tree Rows.

In addition, this alternative would add considerable time and inconvenience to residents, businesses, and commuters via traffic disruptions through the project limits during a longer construction period (by as much as 5-10 years). Extending the construction period would substantially increase the cost of construction based on increase in number of days multiplied by the daily overhead cost.

For all the above reasons, the PDT eliminated this approach from further consideration. However, the elimination of this alternative does not limit consideration of design or construction BMPs or innovative solutions to minimize harm to environmental resources wherever feasible.

2.1.6 Permits and Approvals Needed

Table 2.1.5-1 shows the permits, reviews, and approvals that would be required for project construction.

Table 2.1.5-1: Permits and Approvals Needed

Agency	Permit/Approval	Status
SHPO	<ul style="list-style-type: none"> • Concurrence on the Historic Property Survey Report (HPSR), Historic Resource Evaluation Report ([HRER] including individual historic property eligibility determinations), Finding of Effect (FOE), and Memorandum of Agreement (MOA) • Concurrence with Draft Individual Section 4(f) analysis 	<ul style="list-style-type: none"> • SHPO concurrence on the HPSR and HRER was requested on August 5, 2020. • Caltrans sent the SHPO a <i>Notice of Moving Forward without SHPO Concurrence</i> on October 15, 2020. • Caltrans sent the SHPO the Finding of Adverse Effect (FAE) on September 10, 2021, and received concurrence on the finding on November 18, 2021. • Caltrans consulted with the SHPO to develop the Memorandum of Agreement (MOA), which was executed on February 17, 2022.
San Francisco Bay Regional Water Quality Control Board (RWQCB)	Approval of the SWPPP prior to construction activities	<ul style="list-style-type: none"> • A Notice of Intent and SWPPP will be prepared/submitted before construction.
San Mateo	Temporary Construction Easements	To be sought after final design
Burlingame	Temporary Construction Easements	To be sought after final design
Hillsborough	Temporary Construction Easements	To be sought after final design
Millbrae	Temporary Construction Easements	To be sought after final design

Chapter 3 Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures

This chapter addresses the environmental impacts of the project. The environmental resource discussions presented in this chapter are based on the technical studies cited at the beginning of each discussion. An evaluation of the project consistent with CEQA checklist criteria is provided in Section 4.3. Avoidance, minimization, and/or mitigation measures are discussed in the following sections and summarized in Appendix D.

For the project, the CEQA baseline for all resource areas is May 22, 2020, when the Notice of Preparation was filed with the Governor's Office of Planning and Research. The NEPA baseline for comparing environmental impacts is the No Build Alternative.

Topics Considered but Determined Not to Be Relevant

As part of the scoping and environmental analysis carried out for the project, the following environmental issues were considered but no adverse impacts were identified. As a result, there is no further discussion about these issues in this document.

Existing and Future Land Use

The project would not alter existing or future land uses as it would continue to use existing state right-of-way for transportation use, consistent with existing land use plans for the county and cities/towns adjacent to the project limits. The project would require TCEs of city and private property for construction only and would not change the permanent land use at these locations.

Coastal Zone

The project would have no effects to coastal resources because the project is not located within the California Coastal Zone.

Wild and Scenic Rivers

The project would have no effects on Wild and Scenic Rivers because no Wild and Scenic Rivers are located near the project limits.

Parks and Recreational Facilities

The project would have no effects on parks or recreational facilities because no parks or public recreational facilities are located along El Camino Real in the project limits. Pershing Park, Heritage Park, Paloma Playground, Laguna Park, and Village Park are all 700 to 1,000 feet from El Camino Real in the City of Burlingame and are separated from the project limits by structures along El Camino Real. Ray Park is 400 feet from El Camino Real in the City of Burlingame and is separated from the project limits by three rows of residential houses that abut Balboa Way and Albemarle Way.

Farmlands

The project would have no effects on farmlands because the project is not located near any farmlands.

Timberlands

The project would have no effects on timberlands because the project is not located near any timberlands.

Growth

Since the project would not change existing or future land use designations, change the existing capacity of the roadway, or open any new land for development, it would not induce growth in the project vicinity.

Relocations and Real Property Acquisition

The project would not require any relocations or real property acquisition. The project would be contained within existing state right-of-way, and no new right-of-way would be acquired for the project.

Traffic and Transportation/Pedestrian and Bicycle Facilities

The project proposes no changes to the existing number of lanes or use of the existing lanes on El Camino Real within the project limits. It also does not change any bicycle designations along El Camino Real. As noted in Section 2.1.1, pedestrian facilities within the project limits would be upgraded but no new sidewalks would be added where none currently exist. The project would not change existing transit services on El Camino Real. Therefore, the transportation pattern within the project limits would be unchanged by the project.

Geology/Soils/Seismic/Topography

There are no active faults within the project limits and the soils that underlie the roadway, sidewalks, and replacement retaining walls are stiff clayey and dense sandy materials with limited liquefaction potential (Caltrans 2020b).

Paleontology

The geology underlying the project limits includes marine and nonmarine (continental) sedimentary rocks of the Pleistocene and Pleistocene-Holocene ages (rock types Qoa and QC, respectively) (California Department of Conservation 2021). Rock type Qoa can contain older alluvium, lake, playa, and terrace deposits, whereas rock type QC can contain alluvium, lake playa, and terrace deposits that are unconsolidated or semi-consolidated. Rock type QC may contain nonmarine deposits throughout its distribution and marine deposits near the coast. The project would take place entirely on previously disturbed soil, except for installation of 68 traffic light poles. Traffic light poles would be installed with foundations up to 15 feet below ground surface, with cast-in-drilled-hole (CIDH) concrete piles 2 to 2.5 feet in diameter. The thickness of disturbed fill varies throughout the proposed project at depths up to 10 feet below ground surface. Predominately, Pleistocene and Holocene alluvial sediments are present below the fill. There is a low potential for paleontological resources to be found during construction.

Air Quality

The project would not change the existing or future capacity of the roadway within the project limits and would therefore not affect long-term air quality. The project (both for construction and operational purposes) is exempt from project-level air quality conformity determination under 40 Code of Federal Regulations 93.126 Table 2 as a “pavement resurfacing and/or pavement rehabilitation project.”

Noise

The project is not a Type I project under 23 Code of Federal Regulations 772 as it would not alter the location of a roadway, the horizontal or vertical alignment of the roadway, or increase the number of through-traffic lanes on the roadway. It is not a Type II project as it is not a project for noise abatement on an existing highway. Therefore, the project is a Type III project, no significant operational noise impacts are anticipated, and no Noise Study is required. Construction noise was analyzed, and anticipated construction noise impacts are described in Section 3.4.

Wetlands and Other Waters

Waterways under the jurisdiction of the U.S. Army Corps of Engineers (USACE) were found adjacent to the project limits; however, wetlands were not found during surveys. USACE will be contacted if the scope of work results in impacts to resources under their jurisdiction. As the project does not require any in-water work, no direct impacts are anticipated. The potential for indirect impacts to waterways adjacent to the project limits is described in Section 3.2.1.

Plant Species

Plants considered to be of special concern are based on (1) federal, state, or local laws regulating their development; (2) limited distributions; and/or (3) the presence of habitat required by the special-status plants occurring on site. There were no special-status plant species found within the biological study area, as defined in Section 3.3.1.

Threatened and Endangered Species

Caltrans has made the following determinations for species under the U.S. Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS) jurisdiction that were reviewed for the project: No Effect. Caltrans has determined the project will have no effect on federally listed species. Official species lists were acquired from the USFWS and NMFS on February 3, 2022. They are presented in Appendix C.

3.1 Human Environment

3.1.1 Consistency with State, Regional, and Local Plans and Programs

3.1.1.1 Affected Environment

Areas surrounding the project limits are subject to several community, regional, and transportation plans. The following types of plans were considered and are discussed below:

- Transportation plans/programs
- Regional growth plans
- General plans and related plans
- Habitat conservation plans
- Other planning influences

Transportation Plans/Programs

The project is included in the Metropolitan Transportation Commission's (MTC's) Bay Area Regional Transportation Plan (RTP), Plan Bay Area 2040 (Association of Bay Area Governments [ABAG] and MTC 2017a, amended 2020; RTP ID No. 17-10-0025). The project is in the 2019 Transportation Improvement Program (TIP), as revised with Revision Number 20192019-3941, originally adopted by the MTC on September 28, 2018, and revised on October 15, 2020 and December 11, 2020 (MTC 2018, MTC 2020; TIP ID No. VAR170006). The FHWA and Federal Transit Administration (FTA) originally approved the 2019 TIP on December 17, 2018.

The *San Mateo Countywide Transportation Plan 2040* recognizes El Camino Real as a major arterial having limited pedestrian amenities and street frontages that act as pedestrian barriers (C/CAG 2017).

The *Grand Boulevard Multimodal Transportation Corridor Plan* guides the transformation of El Camino Real into a multimodal corridor from Daly City to San Jose's Diridon Caltrain Station. The Corridor Plan details planned improvements to develop El Camino Real into a pedestrian, bicycle, and transit friendly arterial (SamTrans, VTA, and C/CAG 2010).

Regional Growth Plan and Sustainable Communities Strategy

Plan Bay Area 2040 (ABAG and MTC 2017a) also functions as a regional growth plan for the nine-county San Francisco Bay Area. *Plan Bay Area 2040* designates priority development areas (PDAs), which are areas within existing communities that have been identified and approved by a local city or county for future growth because of proximity to transit, jobs, shopping, and other services. Promoting compact development within PDAs is intended to take development pressure off the region's open space and agricultural lands (ABAG and MTC 2017b).

There are four PDAs within one mile of the project limits: Transit Station Area PDA; Downtown PDA; Burlingame El Camino Real PDA; and, Grand Boulevard Initiative PDA (ABAG 2020).

General Plans and Local Plans

General plans and local plans were reviewed for the jurisdictions that overlap the project limits including San Mateo County and the cities of San Mateo, Burlingame, and Millbrae, and the Town of Hillsborough. However, these plans do not include objectives, goals, or policies applicable to the project as the project does not include permanent features within the jurisdiction of the plans. All of the planned permanent improvements for the project are within state right-of-way.

Habitat Conservation Plans

The Pacific Gas and Electric Company (PG&E) Bay Area Operations and Maintenance Habitat Conservation Plan overlaps the project limits. However, as the Plan is specific to PG&E operation and maintenance activities, the Plan does not contain policies or goals related to the project (U.S. Fish and Wildlife Service 2017).

Bicycle and Pedestrian Plans

C/CAG is updating its Countywide Bicycle and Pedestrian Plan. The *Draft San Mateo Countywide Bicycle and Pedestrian Plan* does not include designated bicycle facilities along the roadway within the majority of the project limits. The plan does identify El Camino Real from Murchison Drive to Millbrae Avenue as a recommended Class 2b buffered bicycle lane. In the Draft Plan, C/CAG also designates several areas along El Camino Real as Pedestrian Focus Areas (C/CAG 2021).

The *San Mateo County Comprehensive Bicycle and Pedestrian Plan* designates El Camino Real as one of the eight focused pedestrian improvement areas (C/CAG 2011).

The *City of San Mateo | Citywide Pedestrian Master Plan* identified El Camino Real (within the city limits) as one of the least favorite places to walk due to safety concerns, including narrow sidewalks and obstructions along sidewalks (City of San Mateo 2012).

The *City of Burlingame Bicycle and Pedestrian Master Plan* states there are no existing or planned bikeways on the roadway within the project limits in the City of Burlingame (Burlingame 2020a). California Drive, which runs roughly parallel to El Camino Real within the project limits, is designated as a Class 1 shared-use bicycle facility. The Plan recommends a Class 1 shared-use bicycle path on the existing path that currently borders El Camino Real from approximately Eastmoor Road (PM 15.1) to Clovelly Lane (PM 15.3). This path is set back from the roadway and is behind existing street trees. The Plan recommends pedestrian enhancements to several intersections within the project limits including adding high-visibility crosswalk markings and making modifications to curb ramps.

The *City of San Mateo Sustainable Streets Plan* includes a number of pedestrian improvements to El Camino Real (mainly south of the project limits) as part of a “longer term vision” for further study (City of San Mateo 2015).

3.1.1.2 Environmental Consequences

Table 3.1.1-1 summarizes the consistency of the No Build and the Build Alternative (either with or without inclusion of the design option) with applicable plans and policies. As described above, the general and local plans as well as PG&E Bay Area Operations and Maintenance Habitat Conservation Plan are not applicable to either the No Build or Build Alternative, and are, therefore, not discussed further.

Table 3.1.1-1: Consistency of Project with Applicable Plans and Policies

Plan/Policy	No Build Alternative	Build Alternative
<p>Grand Boulevard Multimodal Transportation Corridor Plan. Bicycle Network Guidelines. Bike lanes on corridor or, alternatively, sharrow markings in shared lanes. If no bike facilities on corridor (i.e. severely constrained right-of-way), parallel corridor with bike lanes, sharrow markings in shared lanes, or bicycle boulevard.</p>	<p>Consistent. This alternative would not include bike lanes on El Camino Real within the project limits due to severely constrained right-of-way. However, the parallel roadway, California Drive, currently has a designated Class III bike route south of Broadway and a Class II bike lane north of Broadway.</p>	<p>Consistent. This alternative would not include bike lanes on El Camino Real within the project limits due to severely constrained right-of-way. However, the parallel roadway, California Drive, has a designated Class III bike route south of Broadway and a Class II bike lane north of Broadway.</p>
<p>Grand Boulevard Multimodal Transportation Corridor Plan. 5.2.2. Lane Narrowing Automobile travel lanes should be narrowed to the maximum extent feasible to accommodate multimodal transportation options.</p>	<p>Not Consistent. This alternative would not change the existing configuration of the roadway. It does not include a narrowing of the traffic lanes for bike lanes.</p>	<p>Not Consistent. This alternative would not change the existing configuration of the roadway. It does not include the narrowing of traffic lanes to include bike lanes</p>
<p>Draft San Mateo Countywide Bicycle and Pedestrian Plan, Policy 3.8: Support multi-jurisdictional efforts and collaborations with state and regional agencies, including Caltrans, to improve safety for people walking and bicycling.</p>	<p>Not Consistent. This alternative would not alter existing accommodations for bicyclists or pedestrians.</p>	<p>Consistent. This alternative would upgrade existing pedestrian facilities to meet ADA standards on El Camino Real within the project limits, including proposed installation of APS and CPS at 20 intersections from Poplar Avenue to Millbrae Avenue to improve safety. Pedestrian hybrid beacons would also be installed at the intersections of Bellevue Avenue, Willow Avenue, and Palm Drive.</p>
<p>San Mateo County Comprehensive Bicycle and Pedestrian Plan, Policy 1.3: Encourage and collaborate with Caltrans and local agencies to implement countywide priority facilities within their jurisdiction. In particular, encourage Caltrans to provide safe bicycle and pedestrian crossings of state highways in San Mateo County and local agencies to include bicycle and pedestrian projects in their capital improvement programs.</p>	<p>Not Consistent. This alternative would not alter existing accommodations for bicyclists or pedestrians.</p>	<p>Consistent. This alternative would upgrade existing pedestrian facilities to meet ADA standards on El Camino Real within the project limits, including proposed installation of APS and CPS at 20 intersections from Poplar Avenue to Millbrae Avenue to improve safety. Pedestrian hybrid beacons would also be installed at the intersections of Bellevue Avenue, Willow Avenue, and Palm Drive.</p>

Plan/Policy	No Build Alternative	Build Alternative
<p>City of San Mateo Citywide Pedestrian Master Plan, Policy 1.B.1: Identify opportunities to remove barriers, improve or add pedestrian crossings of US Highway 101, State Routes 82 (El Camino Real), State Route 92, the Caltrain railroad tracks, and major arterials.</p>	<p>Not Consistent. This alternative would not upgrade or add pedestrian crossings.</p>	<p>Consistent. This alternative would upgrade existing pedestrian facilities to meet ADA standards on El Camino Real within the project limits, including proposed installation of APS and CPS at 20 intersections from Poplar Avenue to Millbrae Avenue to improve safety. Pedestrian hybrid beacons would also be installed at the intersections of Bellevue Avenue, Willow Avenue, and Palm Drive.</p>
<p>City of San Mateo Citywide Pedestrian Master Plan, Goal 2: Safety. Improve pedestrian safety through the design and maintenance of sidewalks, streets, intersections, and other roadway improvements such as signage and lighting, and landscaping; as well as best practice programs to enhance and improve the overall pedestrian safety.</p>	<p>Not Consistent. This alternative would not improve pedestrian safety.</p>	<p>Consistent. This alternative would upgrade pedestrian facilities to meet ADA standards on El Camino Real, including proposed installation of APS and CPS at 20 intersections from Poplar Avenue to Millbrae Avenue to improve safety. Pedestrian hybrid beacons would also be installed at the intersections of Bellevue Avenue, Willow Avenue, and Palm Drive.</p>
<p>City of San Mateo Citywide Pedestrian Master Plan, Policy 2.B.1: Coordinate with Caltrans to provide median refuge islands on El Camino Real.</p>	<p>Somewhat Consistent. This alternative would not include median refuge islands, though select pedestrian crossings on El Camino Real within the study area include median refuge islands.</p>	<p>Somewhat Consistent. Inclusion of median refuge islands will be evaluated during final design and included where feasible within the project limits.</p>
<p>City of Burlingame Bicycle and Pedestrian Master Plan, Policy 4: Design a connected, convenient, and comfortable pedestrian network to serve people of all ages and abilities.</p>	<p>Not Consistent. This alternative would not upgrade or improve the pedestrian network.</p>	<p>Consistent. This alternative would upgrade pedestrian facilities on El Camino Real, improving the pedestrian network.</p>
<p>City of San Mateo Sustainable Streets Plan, Policy 1.B.1: Coordinate with Caltrans to provide median refuge islands on El Camino Real.</p>	<p>Somewhat Consistent. This alternative would not include median refuge islands, though select pedestrian crossings on El Camino Real within the study area include median refuge islands.</p>	<p>Somewhat Consistent. Inclusion of median refuge islands will be evaluated during final design and included where feasible within the project limits.</p>

Plan/Policy	No Build Alternative	Build Alternative
<p>City of San Mateo Sustainable Streets Plan, Policy 2.B.1 Policy 2.B.1: Identify opportunities to remove barriers and improve or add pedestrian and bicycle crossings of US Highway 101, State Route 82 (El Camino Real), State Route 92, the Caltrain railroad tracks, and major arterials.</p>	<p>Not Consistent. This alternative would not upgrade or improve the pedestrian network.</p>	<p>Consistent. This alternative would upgrade pedestrian facilities on El Camino Real, improving the pedestrian network.</p>
<p>City of San Mateo Sustainable Streets Plan, Policy 2.B.2: Identify gaps in the pedestrian and bicycle facilities networks and needed improvements to and within key pedestrian activity centers and community areas, and define priorities for eliminating these gaps by making needed improvements.</p>	<p>Not Consistent. This alternative would not include improvements for pedestrian and bicycle networks and key activity centers.</p>	<p>Consistent. By updating pedestrian facilities along El Camino Real within the project limits, this alternative would support the inclusion of pedestrian infrastructure improvements along El Camino Real.</p>
<p>City of San Mateo Sustainable Streets Plan, Policy 3.A.1: Ensure that pedestrians, bicyclists, transit vehicles, and automobiles each have space in the travelway that is appropriate to the street's designated mobility function and land use context, per street typologies and overlays defined in the Sustainable Streets Design Guidelines.</p>	<p>Not Consistent. This alternative would not include space improvements for pedestrians, bicyclists, transit vehicles, and automobiles appropriate to the streets' design.</p>	<p>Consistent. By updating pedestrian facilities along El Camino Real within the project limits, this alternative would support the inclusion of pedestrian infrastructure improvements along El Camino Real. Reconstructing El Camino Real would improve ride quality for automobiles and enhance user visibility and safety.</p>
<p>City of San Mateo Sustainable Streets Plan, Policy 3.B.3: Establish and maintain Sustainable Streets Design Guidelines that address topics such as sidewalk zones, street corners and street crossings, and green infrastructure landscape and streetscape approaches that support walking and bicycling.</p>	<p>Not Consistent. This alternative would not include extra steps taken to address walking and bicycling along ECR.</p>	<p>Consistent. Inclusion of pedestrian infrastructure improvements along ECR would adhere to Sustainable Streets Design Guidelines to make sure street crossings are safe for pedestrians.</p>
<p>City of San Mateo Sustainable Streets Plan, Policy 3.D.3: Increase the tree canopy along streets in San Mateo by 10% by the year 2050.</p>	<p>Not Consistent. This alternative would not include any new plantings along the tree canopy in San Mateo by 2050.</p>	<p>Somewhat Consistent. While this alternate would result in a loss of trees during the construction phase, Caltrans is committed to replacing any trees removed by the project with trees that would be younger and healthier than those removed trees.</p>

Based on the table above, the Build Alternative would be consistent or somewhat consistent with the majority of the policies applicable to the project.

3.1.1.3 Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization, or mitigation is required.

3.1.2 Community Character and Cohesion

3.1.2.1 Regulatory Setting

The National Environmental Policy Act (NEPA) of 1969, as amended, established that the federal government use all practicable means to ensure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings (42 United States Code [USC] 4331[b][2]). FHWA in its implementation of NEPA (23 USC 109[h]) directs that final decisions on projects are to be made in the best overall public interest. This requires taking into account adverse environmental impacts, such as destruction or disruption of human-made resources, community cohesion, and the availability of public facilities and services.

Under CEQA, an economic or social change by itself is not to be considered a significant effect on the environment. However, if a social or economic change is related to a physical change, then social or economic change may be considered in determining whether the physical change is significant. Since this project would result in physical change to the environment, it is appropriate to consider changes to community character and cohesion in assessing the significance of the project's effects.

3.1.2.2 Affected Environment

The project is in the cities of San Mateo, Burlingame, and Millbrae, and the Town of Hillsborough in San Mateo County. The proposed project is unlikely to result in impacts to community cohesion within the cities of San Mateo, and Millbrae, and the Town of Hillsborough as the project proposes minor changes to pedestrian infrastructure, drainage facilities, and the existing roadway in these jurisdictions. Therefore, the study area pertinent to community character and cohesion is the City of Burlingame.

Community Profile

The City of Burlingame identifies itself as the 'City of Trees' (Clifford 2018). It is estimated that John McLaren, the landscape gardener that designed Golden Gate Park, planted 80 percent of the trees in the City of Burlingame. Three rows of those trees remain. As stated in Section 3.1.6, the Howard-Ralston Eucalyptus Tree Rows is entirely within the project limits and is listed on the NRHP. The Easton Drive Eucalyptus Tree Rows, a City Heritage Grove, is located on Easton Drive from El Camino Real to Vancouver Avenue. (One tree from the Easton Drive Eucalyptus Tree Rows is located within the limits of the project.) Lastly, there are two sections of trees that comprise the third tree rows including Parcel I (Jules Francard Grove) and Parcel II. The Parcel I (Jules Francard Grove) and Parcel II tree rows run parallel to the railroad tracks on California Drive between North Lane and Larkspur Drive. The Burlingame General Plan also notes four other historic resources listed on the NRHP including Burlingame Station, Kohl Mansion, Severn Lodge Dairy Wall Advertisement, and the William A. Whifler House. In addition, the Anza Expedition Camp Site is listed as a Historic Landmark and is commemorated by a plaque. The General Plan notes much of the City of Burlingame's charm comes from its historic character, which includes historic buildings and entire neighborhoods, as well as its distinguishing eucalyptus groves. It also notes the historic nature of the City contributes to creating neighborhoods that provide a cohesive historic fabric (Burlingame 2019a).

The City of Burlingame has a population of 30,459 with 12,029 households (Census 2018). The City of Burlingame was built for a working-class community. During the 20th Century, the City of Burlingame developed as a “quintessential commuter suburb”, and recently has been heavily influenced by the tech boom on the Peninsula (Burlingame 2019a). However, neither the population nor the availability of housing has increased dramatically which has resulted in a substantial rise in both the median home price and median rent. In addition, the highly regarded schools have attracted more families. The City of Burlingame has a higher proportion of both families with children and retirees than the surrounding San Mateo County. The City of Burlingame also has more rental units than the surrounding County. Half of the housing units are in multi-family structures and 53 percent of all housing units are renter-occupied (Burlingame 2019a).

Neighborhoods within the City of Burlingame that border the project limits including Downtown Burlingame, Burlingame Park, Burlingame Terrace, Easton Addition, Burlingame Grove, Ray Park, and Burlingame Village. The dominant land uses along El Camino Real within the project limits include low-and medium-density residential (e.g., single and multi-family housing), institutional uses (e.g., religious-based and schools), and commercial uses (e.g., neighborhood and regional). A majority of the El Camino Real corridor within the City of Burlingame includes single-family and multi-family residences. Burlingame Plaza, on El Camino Real between Trousdale Drive and Murchison Drive includes a wide variety of commercial establishments such as shopping centers, retail chain stores, restaurants, and medical offices. The existing local street patterns include sidewalks and transit stops. There are no designated lanes or routes for bicyclists on El Camino Real in the project limits.

Public facilities adjacent to the project limits include one school, four places of worship, and no parks. A U.S. Post Office is one block north of El Camino Real on Capuchino Avenue. The Millbrae Caltrain/BART station is just beyond the northern project limits.

The community recognized the importance of El Camino Real to the City of Burlingame and created the El Camino Real Task Force in 2017 to bring together community representatives and members with differing perspectives on the roadway and nearby resources (as described in Section 1.2).

Community cohesion is the degree to which residents have a sense of belonging to their neighborhood, a level of commitment of the residents to the community, or a strong attachment to neighbors, groups, and institutions, usually as a result of continued association over time. Historic resources promote a strong sense of community cohesion, especially for populations that have lived in the area for a long time. Schools, churches, and sidewalks are locations that allow a community to come together and create cohesion. Within the project limits, sidewalks are frequently narrow and broken. Narrow or damaged sidewalks detract from a sense of cohesion for pedestrians along El Camino Real within the City of Burlingame, as compared to other sections of the city that feature more complete pedestrian facilities.

3.1.2.3 Environmental Consequences

No Build Alternative

With the No Build Alternative, community character and cohesion would remain unchanged within the project limits. The character-defining historic resources would remain unchanged, except as noted in Section 2.1.2.

Build Alternative

The Build Alternative (either with or without inclusion of the design option) would not require the permanent acquisition of new right-of-way. Therefore, implementation of the Build Alternative would not result in the displacement of residences, businesses, or community facilities; nor would it result in the physical division of neighborhoods, change social patterns, or impede access to neighborhoods or community facilities for those living in, working in, and visiting the project study area.

The Build Alternative includes features that have the potential to improve the existing community character and cohesion. Upgrades to existing pedestrian infrastructure along El Camino Real in the project limits have the potential to create improved physical space for community cohesion and provide infrastructure for community interactions.

Project construction would require the removal of trees along El Camino Real within the project limits. This has the potential to substantially affect the look and feel of El Camino Real (described further in Section 3.1.5.3) and substantially affect the character defining features of the Howard-Ralston Eucalyptus Tree Rows (described further in Section 3.1.6.3).

Each member of the community is likely to respond differently to the removal of these trees. Responses are likely driven by many personal factors including how long the individual (or individual's family) has resided in the area, how close they live to the project limits, and how frequently they interact with the trees.

It is expected that overall, the removal of trees within the project limits and the associated changes to visual character and historic character would result in a moderate, temporary change to community character and cohesion. Replacement plantings will help the City of Burlingame retain the nickname of "the City of Trees."

3.1.2.4 Avoidance, Minimization, and/or Mitigation Measures

The mitigation measures listed in Sections 3.1.5.4 and 3.1.6.4 would address the physical impacts from the removal of trees within the project limits by requiring a replanting plan developed in consultation with the SHPO.

3.1.3 Environmental Justice

3.1.3.1 Regulatory Setting

All projects involving a federal action (funding, permit, or land) must comply with Executive Order (EO) 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, signed by President William J. Clinton on February 11, 1994. This EO directs federal agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects on the health or environment of minority and low-income populations to the greatest extent practicable and permitted by law. Low income is defined based on the Department of Health and Human Services poverty guidelines. For 2020, this was \$26,500 for a family of four. Minority is defined by Caltrans as any member of the following groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black; or Hispanic (Caltrans 2011).

All considerations under Title VI of the Civil Rights Act of 1964, and related statutes, have also been included in this project. Caltrans' commitment to upholding the mandates of Title VI is demonstrated by its Title VI Policy Statement, signed by the Director, which can be found in Appendix B of this document.

3.1.3.2 Affected Environment

In order to determine the presence of environmental justice communities of concern that have the potential to be affected by the project, the environmental justice analysis includes the Census Block Groups that border the project limits. Block groups are divisions of Census tracts that are delineated by local or regional organizations and usually consist of a cluster of several blocks. For the environmental justice analysis, the study area block groups are compared to the city each block group is in (i.e., reference area). Data for the analysis was derived from the US Census Bureau, American Community Survey 5-year Estimates (2014-2018).

Caltrans identifies a community as an environmental justice community if it meets one or both of the following criteria:

- The minority population exceeds 50 percent or is meaningfully greater (e.g., more than 10 percentage points) than the minority population percentage in the general population or other appropriate unit of geographic analysis (e.g., the county overlapping the study area); or
- The low-income population comprises more than 25 percent or is meaningfully greater (e.g., more than 10 percentage points) than the low-income population percentage in the general population or other appropriate unit of geographic analysis (e.g., the county overlapping the study area).

There are 21 block groups that border the project limits. Eight block groups meet at least one of the criteria that identifies it as an environmental justice community. The results are shown in Table 3.1.3-1.

Table 3.1.3-1: Summary of Race, Ethnicity, and Poverty Status in the Study Area and Reference Areas

Geography	Hispanic (of any race)	Black or African American	Native American and Alaska Native Alone	Asian	Native Hawaiian/Pacific Islander	Total White, Non-Hispanic	Total Minority*	Below Poverty Level
<i>San Mateo County (reference population)</i>	24.7%	2.3%	0.4%	28.1%	1.4%	39.6%	60.4%	7.0%
CT 6044, BG 3	15.1%	0.9%	0.5%	53.0%	0.0%	28.9%	71.1%	7.4%
CT 6050, BG 1	14.5%	4.9%	0.0%	46.1%	0.6%	27.8%	72.2%	5.3%
CT 6050, BG 2	13.6%	0.0%	0.0%	16.1%	0.0%	70.3%	29.7%	19.4%
CT 6051, BG 1	6.6%	3.2%	0.0%	12.7%	0.0%	56.3%	43.7%	1.3%
CT 6051, BG 2	16.7%	0.8%	0.0%	25.0%	0.0%	53.9%	46.1%	12.6%
CT 6052, BG 1	6.6%	2.3%	0.0%	35.2%	0.0%	49.9%	50.1%	0.0%
CT 6052, BG 2	3.9%	0.0%	0.1%	20.0%	1.1%	68.3%	31.7%	4.4%
CT 6053, BG 2	13.5%	0.7%	0.0%	24.4%	0.0%	57.9%	42.1%	10.0%
CT 6053, BG 3	10.6%	0.9%	0.0%	21.7%	0.0%	60.4%	39.6%	10.3%
CT 6053, BG 4	1.3%	0.0%	0.0%	22.2%	0.0%	70.8%	29.2%	7.1%
CT 6055, BG 1	20.3%	1.6%	0.5%	18.2%	0.0%	58.7%	41.3%	5.0%
CT 6055, BG 2	19.8%	0.0%	0.0%	35.0%	0.0%	37.4%	62.6%	5.6%
CT 6055, BG 3	26.3%	7.3%	0.0%	22.2%	0.0%	40.5%	59.5%	1.9%
CT 6056, BG 1	4.1%	0.0%	0.0%	19.0%	0.0%	72.0%	28.0%	2.0%
CT 6056, BG 2	3.0%	0.0%	1.0%	11.3%	0.0%	82.2%	17.8%	0.0%
CT 6058, BG 1	10.9%	0.0%	0.0%	21.6%	0.0%	66.3%	33.7%	5.2%
CT 6058, BG 2	6.7%	2.0%	0.0%	14.4%	0.0%	71.4%	28.6%	0.0%
CT 6059, BG 1	14.8%	2.5%	1.4%	21.7%	1.2%	53.4%	46.6%	7.6%
CT 6059, BG 2	21.3%	0.0%	0.0%	22.5%	1.4%	49.3%	50.7%	6.4%
CT 6059, BG 3	21.1%	1.1%	0.0%	30.0%	0.4%	39.1%	60.9%	8.7%
CT 6064, BG 1	11.2%	0.0%	0.0%	23.6%	0.0%	59.0%	41.0%	2.0%

Notes: *Minority is the sum of all U.S. Census reported groups except White, Non-Hispanic.

CT – Census Tract, BG – Block Group, *Italics* – Reference population, **Bold** – Meets at least one of the criteria of an environmental justice community

Source: Census 2020

3.1.3.3 Environmental Consequences

No Build Alternative

The No Build Alternative does not include any changes to the existing roadway within the project limits. Therefore, there would be no potential effects to environmental justice communities adjacent to the project limits.

Build Alternative

Environmental justice communities were identified in the cities of San Mateo, Burlingame, and Millbrae. From south to north, the sections of the project limits that abut either minority or low-income communities include the northbound side of El Camino Real from East Santa Inez Avenue to East Bellevue Avenue (CT 6059 BG3 and CT 6059 BG 2), both sides of El Camino Real from Peninsula Avenue to just past Floribunda Avenue (CT 6055 BG 3 and CT 6055 BG 2), and the southbound side of El Camino Real from Hillsdale Drive to Millbrae Avenue (CT 6052 BG 1, CT 6050 BG 2, CT 6050 BG 1, and CT 6044 BG 3). These block groups are shown in Figure 3.1.3-1.

The Build Alternative (either with or without inclusion of the design option) would upgrade the sidewalks and pedestrian infrastructure, drainage infrastructure, and roadway throughout the project limits. Neither the design of the Build Alternative nor the resulting improvements vary significantly among the portions of the project limits that abut environmental justice communities nor the portions of the project limits that abut non-environmental justice communities. Therefore, potential adverse effects of the project would not disproportionately affect minority and low-income populations; the environmental justice communities would experience the same improvements and the same level of construction-related effects as non-environmental justice communities within the project limits.

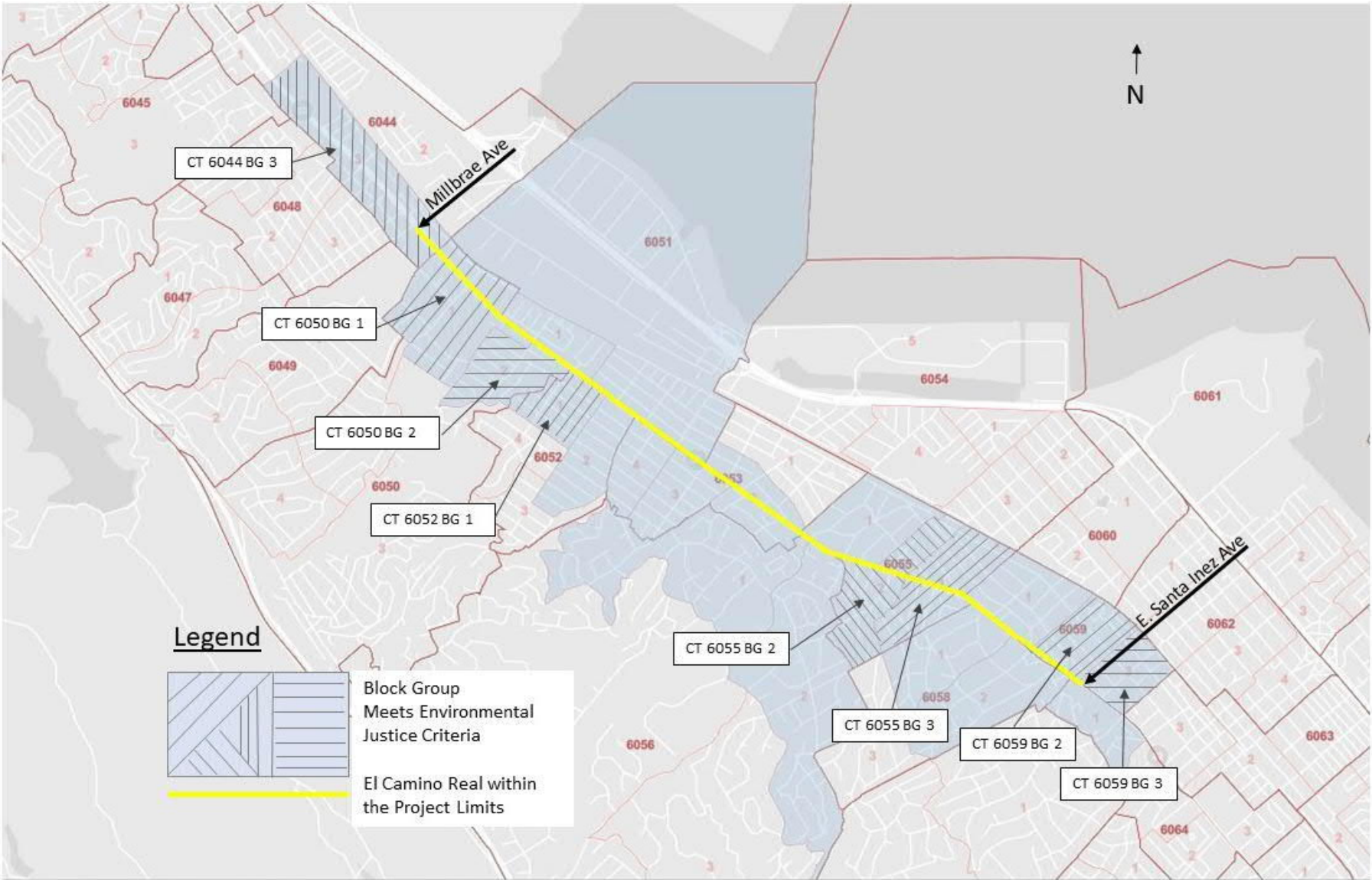


Figure 3.1.3-1: Map of Census Block Groups in the Study Area

3.1.3.4 Avoidance, Minimization, and/or Mitigation Measures

Based on the above discussion and analysis, the Build Alternative will not cause disproportionately high and adverse effects on any minority or low-income populations in accordance with the provisions of EO 12898. No further environmental justice analysis is required.

3.1.4 Utilities/Emergency Services

3.1.4.1 Affected Environment

Utilities and service systems found within the project limits include water, wastewater, solid waste, electric, natural gas, and telecommunications. Water service is provided by San Francisco Public Utilities Commission (SFPUC). Wastewater service is provided by City of San Mateo Department of Public Works, Burlingame Sanitary District, and the Millbrae Public Works. Solid waste, organics, and recycling providers include Recology San Mateo County and South San Francisco Scavenger Company. Electricity and natural gas are provided by PG&E. Telecommunications providers include Comcast, Astound, Peninsula TV, AT&T, Verizon, T-Mobile, and Metro PCS.

SFPUC maintains two water pipelines within existing state right-of-way along El Camino Real from East Santa Inez Avenue, in the City of San Mateo, to Millbrae Avenue, in the City of Millbrae. One of these two pipelines (Crystal Springs Pipeline #1) is an inactive line, but Crystal Springs Pipeline #2 is an active pipeline for the Hetch Hetchy Regional Water System. During the project design phase, Caltrans will work with SFPUC to coordinate any construction activities that may impact their facilities. This coordination would involve distributing engineering plans to SFPUC for review during preliminary and detail design. All proposed improvements on SFPUC infrastructure will comply with SFPUC right-of-way policies and will be reviewed through the SFPUC's Project Review process to ensure that the proposed project conforms to applicable plans and policies.

Police protection and traffic enforcement services in the project limits are provided by California Highway Patrol Golden Gate Division, City of Burlingame Police Department, City of San Mateo Police Department, and San Mateo County Sheriff. Fire protection and emergency medical services are provided by Central County Fire Department and San Mateo Fire Department.

3.1.4.2 Environmental Consequences

No Build Alternative

As the No Build Alternative would not result in changes to El Camino Real, it would not require utility relocations or construction activities that could interfere with the provision of emergency services.

Build Alternative

The Build Alternative (either with or without inclusion of the design option) would require the temporary relocation of some PG&E overhead electrical lines and poles. All utility poles would be reconstructed in similar locations conforming to the reconstructed roadway during the final phases of construction. Any telecommunications services that are co-located on utility poles would be temporarily relocated/restored as well. The relocations may result in short-term, temporary interruptions of service. Final verification of utilities would be performed during the project's detailed design phase, and Caltrans would coordinate with the affected utility owner to minimize potential interruptions of service.

With the inclusion of the design option to underground utilities, overhead electrical lines and telecommunications services would be temporarily relocated during construction then placed under the roadway from Barroilhet Avenue (PM 12.9) to Ray Drive/Rosedale Avenue (PM 15.2) in the City of Burlingame. The relocations may result in short-term, temporary interruptions of service. Final verification of utilities would be performed during the project's detailed design phase, and any needed relocations would be coordinated with the affected utility owner to minimize potential interruptions of service. No impacts to water service are anticipated.

Temporary lane closures on El Camino Real would be required to construct the Build Alternative, which could affect emergency service providers. As described in Section 2.1.1.3, during final design, a TMP will be developed for the project to minimize construction-related delays and inconvenience to emergency service providers, transit providers, residents, and the traveling public. The TMP will include input from the jurisdictions along the project corridor and emergency service providers; notification to emergency service providers, transit operators, and the public of lane closures; coordination with CHP and local law enforcement on contingency plans; and specifications for using portable changeable message signs and the CHP Construction Zone Enhanced Enforcement Program where possible to minimize delays. This will ensure that no emergency services would be adversely affected during construction of the project.

Law enforcement, fire, and emergency services would be maintained during project construction. The project is not expected to result in decreased response times.

Based on the above, the Build Alternative would not result in long-term effects on utilities or emergency services.

3.1.4.3 Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization, or mitigation is required.

3.1.5 Visual/Aesthetics

3.1.5.1 Regulatory Setting

The NEPA of 1969, as amended, establishes that the federal government use all practicable means to ensure all Americans safe, healthful, productive, and *aesthetically* (emphasis added) and culturally pleasing surroundings (42 United States Code [USC] 4331[b][2]). To further emphasize this point, FHWA, in its implementation of NEPA (23 USC 109[h]), directs that final decisions on projects are to be made in the best overall public interest taking into account adverse environmental impacts, including among others, the destruction or disruption of aesthetic values.

The CEQA establishes that it is the policy of the state to take all action necessary to provide the people of the state “with...enjoyment of *aesthetic*, natural, scenic and historic environmental qualities” (CA Public Resources Code [PRC] Section 21001[b]).

California Streets and Highways Code Section 92.3 directs Caltrans to use drought resistant landscaping and recycled water when feasible, and incorporate native wildflowers and native and climate-appropriate vegetation into the planting design when appropriate.

3.1.5.2 Affected Environment

Fundamentals of Visual Impact Assessments

The information presented in this section is from the Visual Impact Assessment (VIA) and Supplemental VIA for the project completed in February 2021 (Caltrans 2021a, Caltrans 2021f). The terminology and methodology used within the VIA are based on the *Visual Impact Assessment for Highway Projects* guidelines (FHWA 1981).

This analysis focuses on the degree of resource change of the visual resources within the project corridor before and after the construction of the proposed project, related to visual character and visual quality. Resource change is one of the two major variables in the equation that determines visual impacts. The other variable is viewer response.

Both natural and created features in a landscape contribute to its visual character. The basic elements that comprise the visual character of landscape features include form, line, color, texture, dominance, scale, diversity, and continuity.

Criteria for evaluating visual quality include the concepts of vividness, intactness, and unity, as defined below (FHWA 1981):

- “Vividness” is the extent to which the landscape is memorable and is associated with distinctive, contrasting, and diverse visual elements.
- “Intactness” is the integrity of visual features in the landscape and the extent to which the existing landscape is free from non-typical visual intrusions.
- “Unity” is the extent to which all visual elements combine to form a coherent, harmonious visual pattern.

Viewer response is a measure or prediction of the viewer's reaction to changes in the visual environment and is a combination of viewer exposure and viewer sensitivity. Two general types of viewers are considered, those with views to the project and those with views from the project. Viewer exposure depends on the number of viewers, the frequency and duration of views, and proximity of viewers to the project. Visual sensitivity is affected by viewer activity, awareness, and local values or expectations. If the viewer group values aesthetics in general or a specific visual resource has been protected by local, state, or national designation, it is likely that viewers will be more sensitive to visible changes.

Existing Visual Resources

Visual Character

The project is located along flat land and is approximately 0.6 mile (at the closest point) west of San Francisco Bay. Land use adjacent to the project limits consists of moderately dense, low-rise development, and thus is contained within a single visual assessment unit. The outsized scale of the historic eucalyptus trees (i.e., the Howard-Ralston Eucalyptus Tree Rows) along both sides of El Camino Real dominates the visual experience of the corridor. The tree trunks are several feet in diameter and are over 100 feet tall. Eucalyptus trees have a light-colored trunk with peeling bark, which contrasts strongly with the canopy high overhead composed of elongated, medium-green leaves. El Camino Real is lined with trees along most of the project limits, but the visual mass of the large eucalyptus trees is very different from that of younger street trees that have been planted more recently.

There are approximately 700 trees lining both sides of El Camino Real within the project limits. There are approximately 600 trees along El Camino Real between Peninsula Avenue and Ray Drive (the limits of the Howard-Ralston Eucalyptus Tree Rows). A total of 391 of these contribute to the historic Howard-Ralston Eucalyptus Tree Rows listed on the NRHP. In addition to the contrast in scale between the large eucalyptus and smaller, newer trees, the visual appearance of these trees varies greatly. The trees include both evergreen and deciduous species of different forms, sizes, and ages. The condition of the trees is also variable and visually apparent, with many trees exhibiting signs of compromised health and structure.

Within the City of Burlingame, there is a relatively narrow roadway cross-section, which contrasts with a wider roadway cross-section in the cities of Millbrae and San Mateo. The wider sections have been altered over time to accommodate increased traffic. The narrow roadway width and large trees together create a sense of enclosure and intimacy within the project limits in the City of Burlingame that is absent in other portions of the project limits.

Throughout much of the project limits, existing development limits distant views to the roadway ahead, and this is most pronounced where the massive, tall historic trees limit the horizon view to a narrow sliver in the distance. In contrast, the horizon view opens up at wider intersections, particularly where commercial development is fronted by parking lots. While the oldest trees within the project limits were planted in the late 1800s, development has occurred over several decades, resulting in a rich diversity of architectural styles and associated ages of landscaping. This diversity is enhanced by the varying residential, commercial, religious, and civic land uses that border El Camino Real in the project limits. El Camino Real within the project limits is not designated as a State Scenic Highway.

Visual Quality

The historic Howard-Ralston Eucalyptus Tree Rows establish a high degree of vividness as a group and as individual specimens. The degree to which they are out of scale with even the largest of typical street trees is immediately compelling and memorable.

Intactness of the corridor is moderate. The visual features are typical of a suburban environment with a mix of mostly residential and some low-rise shopping areas. Utilities, traffic lights, street signs, and other infrastructure are all consistent with this type of environment. The strong presence and maturity of the street trees throughout most of the corridor supports the feeling of intactness.

The incremental nature of development in the corridor has influenced the unity of the setting. Buildings of different scales and architectural styles are located side by side, with 1920s single family residences sometimes adjacent to 1960s three-story multi-family residences. These factors tend to detract from unity, and intactness, to a lesser extent. Unity is also affected by other conditions including tree spacing and gaps within the Howard-Ralston Eucalyptus Tree Rows, and a somewhat haphazard assortment of trees within the project limits. Spacing between the trees varies from less than five feet to over 100 feet due to driveways, utilities and attrition of older trees over time. Large trees have been replaced with new, smaller trees, and various other tree species have been planted at different times as infill within the rows of street trees. The large eucalyptus trees are the primary element tying the visual setting together and are largely responsible for the degree of cohesiveness it does have.

Viewer Response

Regular commuters travel through the project corridor daily in relatively high numbers. Much of the daytime traffic is light to moderate and the speed limit is 35 mph. Traffic can be heavy during commute hours, substantially slowing vehicle travel. This results in moderate to moderate-high exposure of these viewers to the project viewshed (the views that can be seen from the project limits or of the project limits). Commercial truck drivers have infrequent to frequent exposure to the project viewshed. Pedestrians within the project limits are predominantly residents, less numerous than vehicular travelers but with frequent exposure at slow speeds. Taken together, these viewers have a moderate to high exposure to the project viewshed.

Residents and commercial occupants along the roadway corridor have daily exposure for long hours. These viewers have a high level of exposure to the project viewshed.

The Howard-Ralston Eucalyptus Tree Rows are widely known and valued in the broader community due to their striking appearance and historic status. As noted in Section 3.1.2, within the City of Burlingame, the Howard-Ralston Eucalyptus Tree Rows are a source of pride and identity. The trees were planted in the 1870s to promote development along the corridor through beautification of the roadway. There is a history of protecting the Howard-Ralston Eucalyptus Tree Rows dating back to 1908. Notably, the City of Burlingame passed the first of its kind zoning ordinance in 1930, restricting commercial development along El Camino Real to protect the Howard-Ralston Eucalyptus Tree Rows (now encompassed with City Zoning Code Section 25.40.040, which requires minimum 15- to 20-foot setbacks for properties along El Camino Real, including 5-foot-diameter tree wells). Additionally, the City of Burlingame designated the

portion of the Howard-Ralston Eucalyptus Tree Rows within their city limits as a “Heritage Grove” in 1975, and the San Mateo Sites Committee has designated the Howard-Ralston Eucalyptus Tree Rows within the City of Burlingame as a “Point of Historic Significance.” The Howard-Ralston Eucalyptus Tree Rows are listed on the NRHP.

As noted in Section 1.2, the high level of sensitivity to potential changes to the Howard-Ralston Eucalyptus Tree Rows led to the formation of a Task Force in 2017 prior to the beginning of this project. The Task force explored opportunities for improving the safety of the roadway and sidewalks while retaining the character and health of “The Grove”. Their study evaluated expected construction impacts to the Howard-Ralston Eucalyptus Tree Rows and the potential for minimizing these impacts where feasible. Ultimately, the Task Force provided recommendations that addressed correcting functional and safety deficiencies, avoiding impacts to existing trees, maximizing replacement planting of trees unavoidably impacted, and improving pedestrians' sense of comfort and safety.

The long history of efforts to protect the Howard-Ralston Eucalyptus Tree Rows and the character of El Camino Real demonstrates viewers' extremely high sensitivity to changes affecting these resources.

Key Views

Visual assessment units of an area are well-defined "outdoor rooms" with their own visual character and visual quality. It's not feasible to analyze every view of a project. Key views within visual assessment units are identified from publicly accessible places with representative views of the project limits or views to particular areas of interest within the project limits to capture existing visual resources and assess proposed changes. Figure 3.1.5-1 shows the locations and directions of the key views with the project limits. The following key views were considered:

- Key View 1 – south of the Hillside Drive/El Camino Real intersection, looking south on El Camino Real.
- Key View 2 – south of the Forest View Avenue/El Camino Real intersection, looking south on El Camino Real.
- Key View 3 – south of the Carol Avenue/El Camino Real intersection, looking south on El Camino Real.

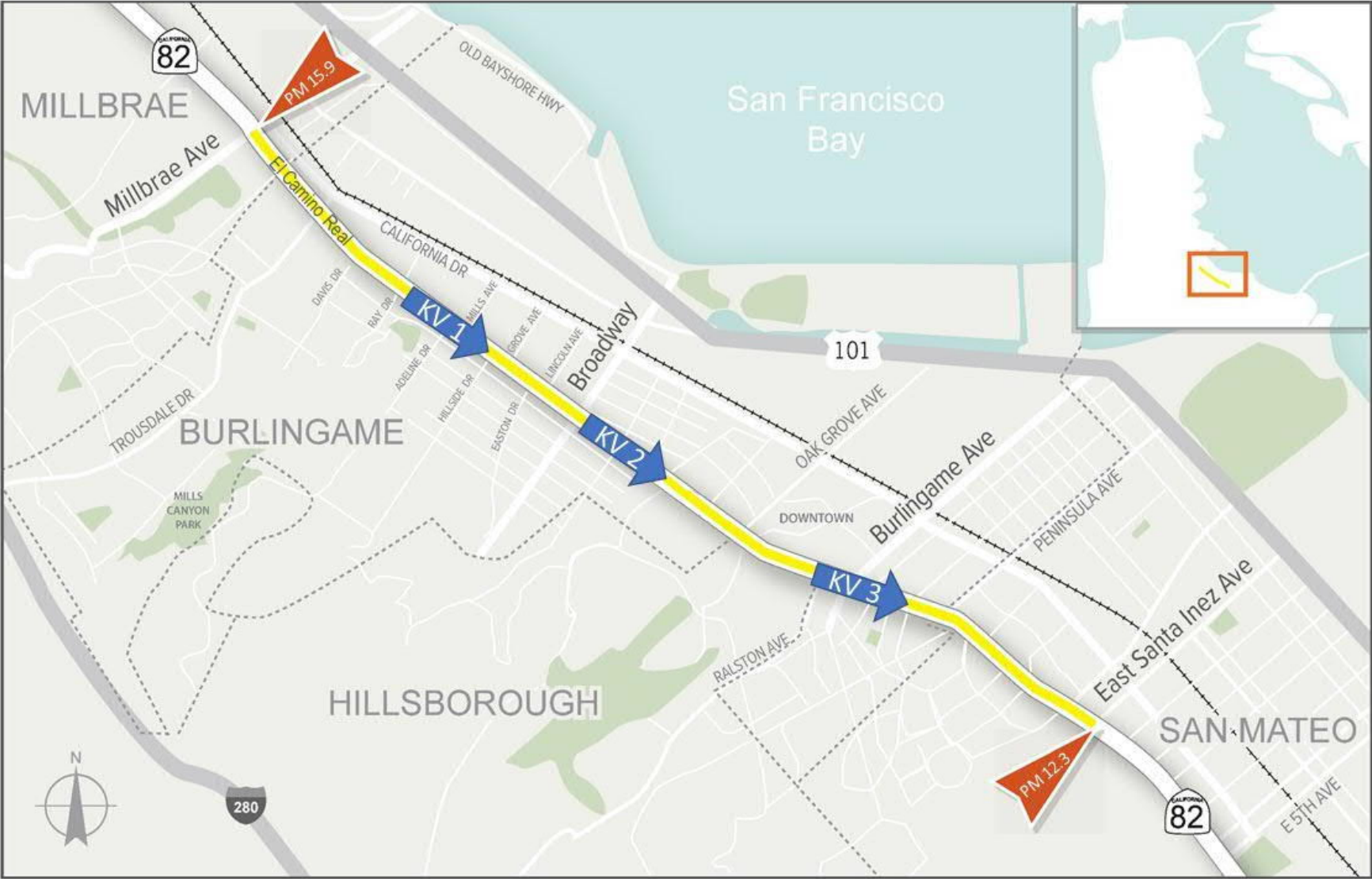


Figure 3.1.5-1: Key Viewpoints

Key View 1 demonstrates the tree-lined character of this portion of the project limits. There are a diversity of tree species and forms in Key View 1 with both moderate-sized sycamores in the foreground and taller evergreens and eucalyptus in the middle and background. The visual mass of the trees creates a feeling of enclosure and limits long distance views. Both the regular spacing of trees and continuous canopy add to the unity of the visual setting and provide a visual screen between adjacent buildings and the roadway environment. Overhead utilities and utility poles are hidden within the mass of tree trunks and canopy. While not immediately obvious, the condition of the sidewalks and roadway surface slightly detract from the visual quality. Figure 3.1.5-2 shows the existing conditions at Key View 1.



Figure 3.1.5-2: Key View 1 Existing Condition

Key view 2 (Figure 3.1.5-3) demonstrates the tree-lined character of this portion of the project corridor and the prominence of the century-old eucalyptus trees in the visual experience. The visual mass of the extremely large eucalyptus trees creates a feeling of enclosure, limits the view of the sky, masks the visual clutter of overhead utilities, and provides a visual screen between adjacent buildings and the roadway environment. Both the tight spacing of trees and continuous canopy enhance vividness and unity, tying the visual setting together and creating a strong sense of cohesiveness. While not immediately obvious, the condition of the sidewalks, roadway surface, and retaining walls slightly detract from the visual quality.



Figure 3.1.5-3: Key View 2 Existing Condition

Key View 3 (Figure 3.1.5-4) demonstrates the tree-lined character of El Camino Real and the prominence of the century-old eucalyptus trees in the visual experience. Even adjacent to the relatively larger two- to three-story multi-family residential buildings shown in Key View 3, the trees remain dominant. The visual mass of the extremely large eucalyptus trees creates a feeling of enclosure and limits long-distance views. Both the regular spacing of trees and continuous canopy enhance vividness and unity, tying the visual setting together and creating an improved sense of cohesiveness. While not immediately obvious, the condition of the sidewalks and roadway surface slightly detract from the visual quality.

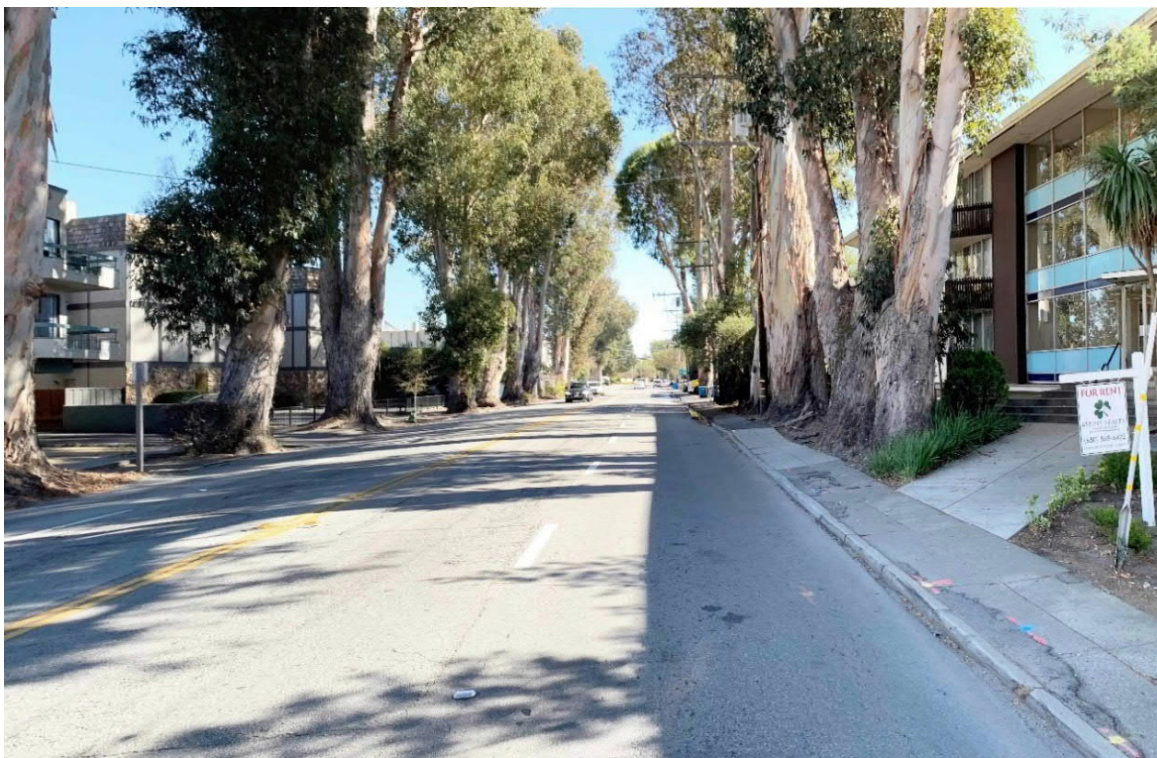


Figure 3.1.5-4: Key View 3 Existing Condition

3.1.5.3 Environmental Consequences

No Build Alternative

No near-term resource changes would result from the No Build Alternative. However, as the older trees reach the end of their lifespan and maintenance repairs are implemented to maintain traffic operations and pedestrian accessibility, it is expected that trees would still require incremental removal under the No Build Alternative. Per Caltrans' agreement with the SHPO, historic trees that require removal would continue to be replaced with elm trees.

For the purposes of this analysis, Figures 3.1.5-2 through 3.1.5-4 also represent the No Build Alternative.

Build Alternative

Overall Viewer Response

Overall viewer response is anticipated to be high for changes that impact the mature Howard-Ralston Eucalyptus Tree Rows. A large segment of the Howard-Ralston Eucalyptus Tree Rows is locally recognized and protected in addition to being listed in the NRHP. Changes to the roadway that do not involve removing historic trees are anticipated to have a much lower viewer response.

Overall Resource Change

The Build Alternative would reconstruct roadway, sidewalks, driveways, curb and gutter, curb ramps, and low retaining walls. Drainage inlets and other below ground drainage facilities would be replaced. Replacement of existing features at or below ground do not typically affect visual character or quality. However, as the condition of the roadway and sidewalks is deteriorated, it is expected that these changes would enhance the project corridor's visual quality along with its functionality.

The Build Alternative would also replace pedestrian crossing signals, including APS and CPS throughout the project limits and install pedestrian hybrid beacons at the intersections of Bellevue Avenue, Willow Avenue, and Palm Drive. While these are above ground elements, they are typical features of local streets and are already present within the project limits. As such they would not contribute to resource change.

The primary visual change from the Build Alternative would result from the removal of existing street trees. The construction required to rehabilitate the roadway, sidewalk, and drainage involves extensive excavation within the root systems of existing mature trees making preservation efforts challenging. The large, older trees are the defining feature of this corridor and are primarily responsible for its visual character and quality. Removal of an estimated 300 to 350 trees would result in a high level of resource change.

Key View 1 Viewer Response

At this Key View, roadway users are expected to have moderate to moderate-high sensitivity and neighbors are expected to have moderate-high to high sensitivity to changes. The rows of mature trees within this view are expected to have value to both roadway users and neighbors. However, the different ages, sizes, and types of trees make it less vivid than portions of the project corridor where the older, extremely large eucalyptus rows are more intact. Sensitivity is considered moderate to moderate-high. As most roadway travelers use the corridor regularly on their work or school commutes and on local trips, exposure is moderate to moderate-high for roadway users. Roadway neighbors who live and work in this area would have high exposure. The overall level of viewer response for this key view is moderate-high.

Key View 1 Resource Change

With the Build Alternative, most of the trees in Key View 1 would require removal in order to replace drainage infrastructure along the southbound side of El Camino Real and to reconstruct driveways on the northbound side. The loss of these trees would change the visual setting notably by dramatically altering the tree-lined character and cohesiveness of the view. While the existing roadway configuration and width would be retained, the view would become more open and the intimate feeling would be diminished due to the removal of the double rows of large

trees and the loss of their enclosing canopy in the foreground. Utility lines and poles would be more visible revealing visual clutter. Figure 3.1.5-5 shows this Key View 20 years after project completion. Replacement trees that would be planted with implementation of the avoidance, minimization, and mitigation measures listed in Section 3.1.5.4 are simulated in this figure as well.

Replanted street trees would help to restore the visual character and quality seen in the existing condition. However, their much smaller scale post-construction and reduced number of trees would not reestablish the same visual quality as the No Build Alternative. Current restrictions on tree planting adjacent to utility poles and underneath power lines limit the potential number of replacement trees and their mature size along the southbound side of the roadway (as noted in the *Replanting Plan* in Appendix F). Since trees cannot be planted within 10 feet of a utility pole, and trees underneath power lines must not reach a height over 25 feet at maturity, the visual character and quality would not fully be restored even over time. By locating the sidewalk at the curb near the intersection as shown along the southbound side of the roadway, corner sight distance would be maintained, and tree replanting would be maximized. Beyond the required area of clear sight distance, the sidewalk would meander back to its existing location behind the planting strip to provide a buffer between pedestrians and traffic. New roadway surfaces and sidewalks would improve visual quality to some degree. The overall level of resource change would be moderate-high to high post construction and moderate-high 20 years after construction.



Figure 3.1.5-5: Key View 1 with Build Alternative (+20 years)

Key View 2 Viewer Response

At this Key View, both roadway users and neighbors are expected to have high sensitivity to changes because views are distinctive and memorable. Exposure is moderate to moderate-high

for roadway users as most roadway travelers use El Camino Real regularly for work or school commutes and local trips. Roadway neighbors who live and work in this area would have high exposure. The overall level of viewer response for Key View 2 is high.

Key View 2 Resource Change

With the Build Alternative, most of the trees within Key View 2 would require removal in order to replace crumbling retaining walls along both sides of El Camino Real that are within state right-of-way (as described in Section 2.1.1.2). The loss of these trees would change the visual setting dramatically. While the existing roadway configuration and width would be retained, the view would become more open and the intimate feeling for highway users, and privacy enjoyed by highway neighbors would be diminished due to removal of the large trees and the loss of the enclosing canopy. Utility lines and poles would become more visible revealing visual clutter. A new pedestrian hybrid beacon would also be visible in the distance at the Palm Drive pedestrian crossing. Figure 3.1.5-6 shows this key view 20 years after project completion. Replacement trees that would be planted with implementation of the avoidance, minimization, and mitigation measures listed in Section 3.1.5.4 are simulated in this figure as well.

Replacement trees help to restore the tree-lined character and cohesiveness of the view. However, their much smaller scale post-construction and reduced number does not have the same visual quality as the No Build Alternative with its rows of towering, mature trees. In this Key View, since all of the trees require removal, replacement trees can be placed in between the roadway and sidewalk, creating a buffer from traffic for pedestrians.

As noted for Key View 1, current restrictions on tree planting adjacent to utility poles and underneath power lines limit the number of replacement trees as well as their mature size along the southbound side of the roadway. While taller tree species may be planted on the northbound side, shorter tree species would need to be planted on the southbound side. Even over time, the stature of the replacement trees on the southbound side of the roadway would never approach that of the No Build Alternative. New roadway surfaces, sidewalks, and retaining walls improve visual quality to some degree. The overall level of resource change is high post construction. Twenty years after construction, the replacement trees would reduce the level of resource change to moderate-high as their canopies increase in size and begin to enclose the roadway.



Figure 3.1.5-6: Key View 2 with Build Alternative (+20 years)

Key View 3 Viewer Response

Both roadway users and neighbors are expected to have high sensitivity to changes at Key View 3 due to its distinctiveness and memorability. Exposure is moderate to moderate-high for roadway users as most roadway travelers use El Camino Real regularly for work or school commutes and local trips. Roadway neighbors who live and work in this area would have high exposure. The overall level of viewer response for Key View 3 is high.

Key View 3 Resource Change

With the Build Alternative, many trees visible in Key View 3, primarily along the northbound side of El Camino Real, would be removed in order to replace sidewalks, driveways, and the curb and gutter. While the existing roadway configuration and width would be retained, the view would become more open and the intimate feeling would be diminished due to the removal of the large trees and the loss of their enclosing and screening canopy. This would be more pronounced in Key View 3 due to the larger scale of the buildings and the greater setback to the front of the buildings along northbound El Camino Real. The retention of some large, mature trees along the southbound side of El Camino Real would help to maintain a degree of character and quality, and utility lines and poles would remain mostly hidden in the tree canopy. Figure 3.1.5-7 shows this key view 20 years after project completion. Replacement trees that would be planted with implementation of the avoidance, minimization, and mitigation measures listed in Section 3.1.5.4 are simulated in this figure as well.

Replacement trees would help to further restore the tree-lined character and cohesiveness of the view. However, the much smaller scale of the trees post-construction and the reduced number of

potential trees planted due to sight distance requirements would not have the same visual quality as the No Build Alternative. New roadway surfaces and sidewalks would improve visual quality to some degree. Future replacement trees on southbound El Camino Real would be limited in size and number due to utility restrictions. The overall level of resource change would be moderate-high to high post construction. Twenty years after construction the level of resource change would still be considered moderate-high.



Figure 3.1.5-7: Key View 3 with Build Alternative (+20 years)

Build Alternative with Design Option

As described in Section 2.1.1.1, a design option is being evaluated for the project that would underground all overhead utilities between Barroilhet Avenue (PM 12.9) and Ray Drive/Rosedale Avenue (PM 15.2) in the City of Burlingame. This design option would not change the quantity or location of trees that would be removed for the Build Alternative. However, it would change the potential species, size, and quantity of replacement plantings included in the mitigation measures listed in Section 3.1.5.4. As noted in Appendix F, implementation of the design option would result in a 30 percent increase in the number of replacement trees.

Key View 1 Resource Change

Inclusion of the design option in this view would both improve unity, by reducing visual clutter and would allow more space for replacement tree planting. Replacement trees would help to restore the tree-lined character and cohesiveness of the view. Post-construction, the replacement trees under the design option would still be of a much smaller scale and would result in lower visual quality. However, over time the replacement trees would reach a stature similar to the No

Build Alternative. This design option would also allow for more trees to be replanted. The overall level of resource change would be moderate-high post-construction and moderate-low 20 years after construction. Figure 3.1.5-8 shows this key view 20 years after project completion with the design option incorporated. Replacement trees that would be planted with implementation of the avoidance, minimization, and mitigation measures listed in Section 3.1.5.4 are simulated in this figure as well.



Figure 3.1.5-8: Key View 1 with Build Alternative and Design Option (+20 years)

Key View 2 Resource Change

Inclusion of the design option in this view would both improve unity, by reducing visual clutter and allow for the planting of a higher quantity and larger species of replacement trees. Trees replaced in similar numbers to those being removed would help to restore the tree-lined character and cohesiveness of the view. Figure 3.1.5-9 shows this key view 20 years after project completion with the design option incorporated. Replacement trees that would be planted with implementation of the avoidance, minimization, and mitigation measures listed in Section 3.1.5.4 are simulated in this figure as well.

Figure 3.1.5-9 shows eucalyptus trees on the northbound side, and elm and other varieties on the southbound side. The elms, with their smaller trunk size, would provide greater visibility for driveway users, and allow for a greater number of replacement trees to be placed in the planted buffer. Elms and other species would have different visual qualities from the No Build Alternative but would still contribute to the visual quality of this view. Post-construction, the replacement trees under the design option would still be of a much smaller scale and would result in lower visual quality. However, the replacement trees that are possible along the southbound

side of the street with the design option would bring visual quality closer to the No Build Alternative as the trees mature. The overall level of resource change would be high post construction. Twenty years after construction, the replacement trees would reduce the level of resource change to moderate as their canopies increase in size and begin to enclose the roadway creating a screen between adjacent buildings and the roadway environment.



Figure 3.1.5-9: Key View 2 with Build Alternative and Design Option (+20 years)

Key View 3 Resource Change

In the near-term, the inclusion of the design option would have a nominal effect on visual character and quality since the overhead utilities would be largely hidden in the canopies of the retained trees. Over time as these older trees near the end of their lifespan and require replacement, the absence of the overhead utilities would result in less visual clutter. Trees being replaced in similar numbers to those being removed would help to restore the tree-lined character and cohesiveness of this key view. Post-construction, the replacement trees under the design option would still be of a much smaller scale and would result in lower visual quality. However, the replacement tree species that are possible with the design option would reach a large stature at maturity, bringing visual quality closer to the No Build Alternative as the trees mature. Without the restrictions of overhead utilities, these large-statured species could continue to be replanted in the future when the older trees need to be removed. Figure 3.1.5-10 shows this key view 20 years after project completion with the design option incorporated. Replacement trees that would be planted with implementation of the avoidance, minimization, and mitigation measures listed in Section 3.1.5.4 are simulated in this figure as well. The overall level of resource change would be moderate-high to high post construction. Twenty years after

construction, the replacement trees would reduce the level of resource change to moderate as their canopies increase in size and begin to enclose the roadway.



Figure 3.1.5-10: Key View 3 with Build Alternative and Design Option (+20 years)

Visual Impact

Resource change among the key views is a factor of the amount of tree removal at each location, the character and quality of the trees removed, the pattern of removal, and adequate space available to replace them. Viewer response is moderate-high to high across the key views and contributes to higher levels of effects to visual resources overall. Table 3.1.5-1 summarizes the effects of the Build Alternative both without and with the inclusion of the design option on the three key views identified for the project. Figure 3.1.5-11 includes a summary of Figures 3.1.5-5 through 3.1.5-10.

Table 3.1.5-1: Effects Summary

Key View	Visual Impact with Build Alternative (+20 years)	Visual Impact with Build Alternative and Design Option (+20 years)
1	Moderate-High	Moderate
2	High	Moderate-High
3	High	Moderate-High

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Figure 3.1.5-11: Summary of Key Views 1 through 3: Existing Conditions; with Build Alternative(+20 years); and with Design Option (+20 years)



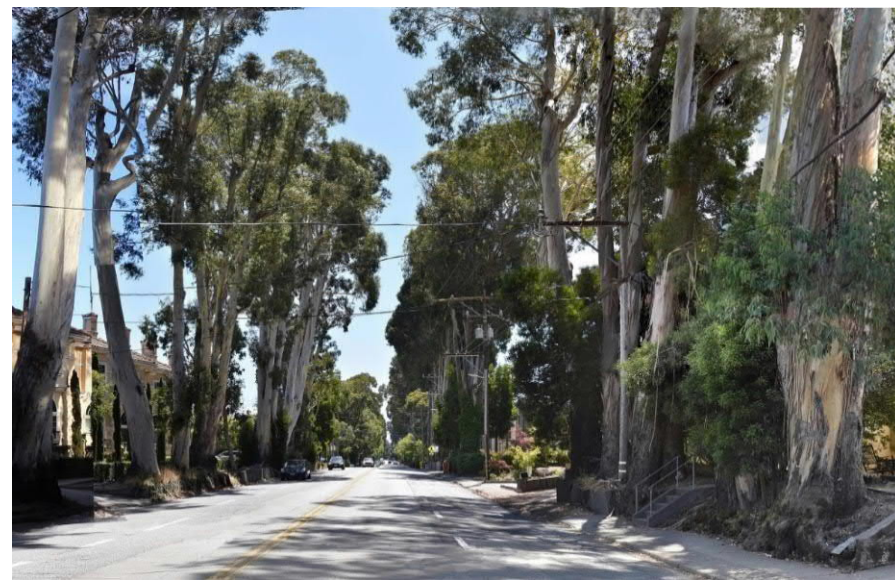
Key View 1: Existing Condition



Key View 1: Build Alternative (+20 years)



Key View 1: Build Alternative with Design Option (+20 years)



Key View 2: Existing Condition



Key View 2: Build Alternative (+20 years)



Key View 2: Build Alternative with Design Option (+20 years)



Key View 3: Existing Condition



Key View 3: Build Alternative (+20 years)



Key View 3: Build Alternative with Design Option (+20 years)

3.1.5.4 Avoidance, Minimization, and/or Mitigation Measures

The following avoidance, minimization, and mitigation measures are required for the Build Alternative (with and without the design option). Additional details about determining replacement plantings are provided in the *Replanting Plan* in Appendix F.

VIS-1. The following minimization measures will be incorporated into the final design and construction of the project to minimize effects to trees:

- Design modifications, including, but not limited to, sidewalk meanders around tree trunks, sidewalk ramping over tree roots, and adjustment of driveway conforms to sidewalks and the roadway will be implemented where feasible.
- Alternative construction practices, including, but not limited to, hand excavation around structural roots and trenchless drilling will be implemented where feasible.
- Trees and vegetation outside of clearing and grubbing limits shall be protected from construction operations, equipment, and materials storage.
- Soils within planting areas shall be protected from construction operations, equipment, and materials storage to maintain suitable growing conditions for existing and replacement street trees. Protective measures shall include avoiding compaction and introduction of materials inconducive to plant growth. Corrective amendments and treatments will be used if planting area soils are damaged during construction.

VIS-2. Following completion of roadway construction, replacement street trees shall be planted in roadside areas of the Caltrans right-of-way consistent with horticultural and maintenance guidelines and safety and sight distance standards. Removed vegetation will be replaced at a 1:1 ratio provided there is adequate space within the roadside areas of the project limits within Caltrans' right-of-way. Replacement planting species and size will be determined during final design.

VIS-3. A permanent irrigation system for replacement plantings will be specified during final design and installed prior to replacement street tree planting within the limits of the Howard-Ralston Eucalyptus Tree Rows.

VIS-4. A three-year plant establishment period will be specified during final design and implemented immediately following construction of planting and irrigation systems. The three-year plant establishment period will be implemented in accordance with Section 20-4 of the standard specification.

VIS-5. A 20-year management plan shall be prepared in consultation with a certified consulting arborist and shall prescribe methods for the long-term care of both retained trees and replacement trees within the limits of the Howard-Ralston Eucalyptus Tree Rows, in order to ensure the sustained health and viability of the trees within the Tree Rows.

3.1.6 Cultural Resources

3.1.6.1 Regulatory Setting

The term “cultural resources,” as used in this document, refers to the “built environment” (e.g., structures, bridges, railroads, water conveyance systems, etc.), places of traditional or cultural importance, and archaeological sites (both prehistoric and historic), regardless of significance. Under federal and state laws, cultural resources that meet certain criteria of significance are referred to by various terms including “historic properties,” “historic sites,” “historical resources,” and “tribal cultural resources.” Laws and regulations dealing with cultural resources include:

The National Historic Preservation Act (NHPA) of 1966, as amended, sets forth national policy and procedures for historic properties, defined as districts, sites, buildings, structures, and objects included in or eligible for listing in the National Register of Historic Places (NRHP). Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties and to allow the Advisory Council on Historic Preservation (ACHP) the opportunity to comment on those undertakings, following regulations issued by the ACHP (36 Code of Federal Regulations [CFR] 800). On January 1, 2014, the First Amended Section 106 Programmatic Agreement (PA) among the Federal Highway Administration (FHWA), the ACHP, the California State Historic Preservation Officer (SHPO), and Caltrans went into effect for Department projects, both state and local, with FHWA involvement. The PA implements the ACHP’s regulations, 36 CFR 800, streamlining the Section 106 process and delegating certain responsibilities to Caltrans. The FHWA’s responsibilities under the PA have been assigned to Caltrans as part of the Surface Transportation Project Delivery Program (23 United States Code [USC] 327).

Historic properties may also be covered under Section 4(f) of the U.S. Department of Transportation Act, which regulates the “use” of land from historic properties. See Appendix A for specific information about Section 4(f).

The California Environmental Quality Act (CEQA) requires the consideration of cultural resources that are historical resources and tribal cultural resources, as well as “unique” archaeological resources. California Public Resources Code (PRC) Section 5024.1 established the California Register of Historical Resources (CRHR) and outlined the necessary criteria for a cultural resource to be considered eligible for listing in the CRHR and, therefore, a historical resource. Historical resources are defined in PRC Section 5020.1(j). In 2014, Assembly Bill 52 (AB 52) added the term “tribal cultural resources” to CEQA, and AB 52 is commonly referenced instead of CEQA when discussing the process to identify tribal cultural resources (as well as identifying measures to avoid, preserve, or mitigate effects to them). Defined in PRC Section 21074(a), a tribal cultural resource is a CRHR or local register eligible site, feature, place, cultural landscape, or object which has a cultural value to a California Native American tribe. Tribal cultural resources must also meet the definition of a historical resource. Unique archaeological resources are referenced in PRC Section 21083.2.

PRC Section 5024 requires state agencies to identify and protect state-owned historical resources that meet NRHP listing criteria. It further requires Caltrans to inventory state-owned structures in its rights-of-way. Sections 5024(f) and 5024.5 require state agencies to provide notice to and consult with the State Historic Preservation Officer (SHPO) before altering, transferring,

relocating, or demolishing state-owned historical resources that are listed on or are eligible for inclusion in the NRHP or are registered or eligible for registration as California Historical Landmarks. Procedures for compliance with PRC Section 5024 are outlined in a Memorandum of Understanding (MOU) between Caltrans and the SHPO, effective January 1, 2015. For most Federal-aid projects on the State Highway System, compliance with the Section 106 PA will satisfy the requirements of PRC Section 5024.

3.1.6.2 Affected Environment

The following cultural resource reports have been completed for the project: Archaeological Survey Report (ASR) (Caltrans 2019), Historic Resources Evaluation Report (HRER) (Caltrans and AECOM 2020), Extended Phase I (XPI) Report (Alta Archaeological Consulting 2020), Historic Property Survey Report (HPSR) (Caltrans 2020c), and Supplemental HPSR (Caltrans 2021b).

Defining the Area of Potential Effects

The study area for cultural resources is the Area of Potential Effects (APE), which encompasses all areas within the physical footprint of the improvements proposed for the Build Alternative as well as areas that may either be directly or indirectly affected by project construction activities.

The archaeological APE consists of the existing Caltrans right-of-way and all properties where TCEs are proposed. The architectural APE encompasses the archaeological APE and generally includes the entirety of the parcels where TCEs are proposed.

The vertical APE represents the maximum vertical extent of project-related activities. The vertical APE extends from the ground surface to a depth of 15 feet, the maximum proposed depth for signal pole foundations.

Records and Archival Review

A cultural resources records search was conducted by the Northwest Information Center of the California Historical Resources Information System, at California State University, Sonoma, for the APE and a 0.5-mile radius. Reports for previous studies were reviewed for each APE plus a 0.5-mile radius. Other standard cultural resource inventories and references were also reviewed, including the NRHP, CRHR, California State Historical Landmarks, California Points of Historic Interest, Burlingame Historical Society, Burlingame Building Department, San Mateo Building Department, the Burlingame Public Library, the California State Library in Sacramento, recorded maps on file with the San Mateo County Assessor, historic newspapers and journals, historic Sanborn Fire Insurance maps, historic aerial photography, primary texts, and academic works.

In addition, previous reports prepared for Caltrans within the APE were reviewed including reports for the Proposed Widening of State Highway 82 in the Town of Hillsborough, San Mateo County and reports for the Floribunda Avenue Intersection Safety Improvement Project along El Camino Real in San Mateo County (Kostura 1999, Clementino 2014). The NRHP nomination for the Howard-Ralston Eucalyptus Tree Rows of the Burlingame Historical Society (Pfaff 2011) also was reviewed.

Three archaeological resources were recorded within the archaeological APE. None of these resources has been evaluated formally for eligibility to the NRHP or the CRHR.

Within the architectural APE, there are 178 resources that had either been previously identified or are more than 45 years old and have been evaluated for this project.

Field Surveys

Accessible portions of the archaeological APE were surveyed by archaeologists between September and October 2019. Although most of the APE is paved and landscaped with rocky material, there were several landscaping strips and gardens with observable soil. Several of these landscaped areas exhibited fragmented shell. Shell deposits consisted primarily of oyster with a low proportion of clam. A large swath of a park south of Rosedale Avenue at the north side of the APE was observed carefully but no cultural materials were found in this area.

Additionally, an Extended Phase 1 field investigation was conducted to identify potential buried cultural deposits of three archaeological resources previously recorded within the archaeological APE. A total of 27 cores were excavated. However, the results determined that these areas do not appear to be highly or very highly sensitive for buried archaeology, as previously mapped (Blake 2019). No intact archaeological materials were identified within the project limits. Extended Phase 1 field investigations determined the three previously identified archaeological resources are not present within the project APE.

Built resources within the architectural APE were surveyed by architectural historians in November 2019 and January 2020 from the state right-of-way.

Native American Consultation

The NAHC was contacted on July 25, 2019, to request a search of the Sacred Lands File for cultural resources of significance to Native Americans within or near the APE.

The NAHC responded on July 30, 2019, reporting negative search results. The NAHC provided a list of Native American parties and individuals with potential interest in the project and their contact information. Letters providing project information and requesting input were sent to each individual and organization on the list on August 1, 2019. Follow-up calls were conducted on November 6, 2019, and the following is a summary of the responses from the calls:

- Ms. Irenne Zwielerlein of the Amah Mutsun Tribal Band of Mission San Juan Bautista expressed interest in providing monitoring services should any further archaeological work be conducted for this project.
- Ms. Ann Marie Sayers of the Indian Canyon Mutsun Band of Costanoan recommended that archaeological and Native American monitors be present for any ground disturbing work and would like to be kept informed of studies and scheduling.
- Mr. Andrew Galvan of the Ohlone Indian Tribe identified the project area as one of high cultural sensitivity and recommended monitoring of ground-disturbing activities.

All the above individuals were provided with information regarding a public information meeting on December 11, 2019. Those individuals on the NAHC list who have not responded were emailed information about the meeting. No other responses were received.

Letters were sent via email to all interested Native Americans on April 15, 2021 updating them on the project and proposed Finding of Adverse Effect for the project. No responses were received.

Consultation among the Native American parties and individuals and Caltrans is ongoing.

Community Consultation

Caltrans District 4 conducted the public participation and interested parties' outreach for this project. Caltrans identified potential local interested parties and sent notification letters to the following organizations:

- Burlingame Historical Society (August 1, 2019)
- Burlingame Planning Department (August 1, 2019)
- Burlingame Planning Commission (September 9, 2019)
- Cultural Landscape Foundation (September 9, 2019)
- California Garden & Landscape History Society (September 9, 2019)
- Town of Hillsborough (August 1, 2019)
- San Mateo Planning Department (August 1, 2019)
- Millbrae Historical Society (January 8, 2020)
- San Mateo County Historical Society (August 1, 2019)

A summary of the responses received are below:

- The Cultural Landscape Foundation would like to review the draft environmental document for the project when it becomes available.
- The California Garden & Landscape History Society responded that the organization did not have any comments on the project.
- San Mateo Planning Department responded that the Saint Joseph Parish at 770 N. El Camino Real located within the APE for the project is an informal community landmark.
- Jennifer Pfaff, President of the Burlingame Historical Society, initially responded in August 2019 and consultation is ongoing with the organization regarding the project. Ms. Pfaff has assisted with background research of the materials held within the Burlingame Historic Society archives.
- The Millbrae Historical Society responded with no concerns.
- A public information meeting/open house was held at the Burlingame Recreation Center on January 28, 2020. A virtual open house scoping comment period website was posted online for 45 days from the May 26, 2020 to July 6, 2020.

SHPO Consultation

Consultation with the SHPO was initiated on March 11, 2020, with an in-person meeting with Natalie Lindquist and Lucinda Woodward of the California Office of Historic Preservation (OHP) and the following Caltrans staff: Frances Schierenbeck, Senior Environmental Planner, Caltrans District 4 Office of Cultural Resources Studies (OCRS); Christopher Caputo, Office Chief, OCRS; and David Price, Section 106 Coordinator, Caltrans Cultural Studies Office (CSO) - Sacramento. Caltrans sent results of cultural resource studies to the SHPO on August 4, 2020, for concurrence on the Determination of Eligibility of cultural resources in the APE for the NRHP; no response was received. Because 30 days for comment had passed, per stipulation VIII.C.6a of the January 2014 PA, on October 15, 2020, Caltrans sent the SHPO a Notice of Moving Forward without SHPO concurrence on its Determination of Eligibility for the SM 82 ADA and Rehabilitation Improvements Project (EA 0K810, EFIS 046000142). Caltrans sent the SHPO the Finding of Adverse Effect (FAE) on September 10, 2021 and received concurrence on the finding on November 18, 2021. Caltrans consulted with the SHPO to develop the MOA, which was executed on February 17, 2022. A copy of the MOA is included in Appendix H.

Cultural Resources within the APE

There are 32 historic resources within the APE. Twenty-eight resources are historic properties subject to Section 106 of NHPA: one resource that is currently listed on the NRHP; two resources that were previously determined eligible for listing on the NRHP; and 25 resources that have been determined eligible for listing on the NRHP as a result of the analysis for this project. One of these resources, the Easton Drive Eucalyptus Tree Rows, was not included in the original APE nor was it evaluated for the NRHP in the initial studies. Caltrans D4 OCRS requested and received permission from CSO on February 16, 2021, to assume the resource eligible for the NRHP under Criteria C for the purposes of the undertaking as outlined under Stipulation VIII.C.4 of the January 2014 PA. Four additional resources are historical resources for the purposes of CEQA only. The 32 historic resources are listed in Table 3.1.6-1 and further described below.

One additional resource in the APE, California Historical Landmark No. 48: Anza Expedition Camp, does not meet the CRHR criteria outlined in PRC 5024.1 and is not considered a historical resource under CEQA, per CEQA guidelines 15064.5, nor is it subject to Section 106 of the NRHP.

Due to the similar age and style of many of the buildings, a preliminary analysis of the APE was done to determine if there was a potentially a historic district. Although there are NRHP eligible and listed cultural resources within the APE, there are not enough eligible buildings nor cohesiveness with regards to the locations of the buildings to make a district.

Table 3.1.6-1: Historic Properties in the APE

Name Address	NRHP Eligibility / Criteria¹	Period of Significance²
Howard-Ralston Eucalyptus Tree Rows NRHP #12000127	Listed in NRHP / A and C	1873 to 1930
Easton Drive Eucalyptus Tree Rows	Eligible for NRHP / C	1873 to 1876
Adeline Apartments 1479 El Camino Real, Burlingame	Eligible for NRHP / C	1958
1265 El Camino Real, Burlingame	Eligible for NRHP / A and C	1938; 1946
The El Camino 1136 El Camino Real, Burlingame	Eligible for NRHP / C	1928
La Solana 1124 El Camino Real, Burlingame	Eligible for NRHP / C	1930
1045 El Camino Real, Burlingame	Eligible for NRHP / C	1936
1041 El Camino Real, Burlingame	Eligible for NRHP / A	1924
El Rey Apartments 1021 El Camino Real, Burlingame	Eligible for NRHP / C	1931
1501 Forest View Avenue, Burlingame	Eligible for NRHP / C	1931
New Life Community Church 1430 Palm Drive, Burlingame	Eligible for NRHP / C; Criterion Consideration A	1930 to 1950
Russian Church of All Saints 744 El Camino Real, Burlingame	Eligible for NRHP / C; Criterion Consideration A	1963
Arcamino West 1515 Arc Way, Burlingame	Eligible for NRHP / A and C	1961 to 1964
Sharon Estate Speculative House / Newlands Estate 1615 Floribunda Avenue, Hillsborough	Eligible for NRHP / A and C	1893 to 1940s
Sharon Estate Speculative House / A. Page Brown Cottage 50 Kammerer Court, Hillsborough	Eligible for NRHP / A and C	1893 to 1940s
The Viking 500 El Camino Real, Burlingame	Eligible for NRHP / C	1958
St. Paul's Episcopal Church Complex 415 El Camino Real, Burlingame	Eligible for NRHP / B and C; Criterion Consideration A	1936 to 1953
Former office and residence of Dr. A.L. Lachman 405 El Camino Real, Burlingame	Eligible for NRHP / C	Circa 1934
Burlingame Towers 1469 Bellevue Avenue, Burlingame	Eligible for NRHP / A and C	1962
Burlingame United Methodist Church 1443 Howard Avenue, Burlingame	Eligible for NRHP / C; Criterion Consideration A	1925 to 1952
120 El Camino Real, Burlingame	Eligible for NRHP / C	1929
90 El Camino Real, Burlingame	Eligible for NRHP / C	1963
15 Park Road, Burlingame	Eligible for NRHP / C	1928
The Carol 55 El Camino Real, Burlingame	Eligible for NRHP / C	1961
1500-1504 Barroilhet Avenue, Burlingame	Eligible for NRHP / C	1922
St. Joseph Parish 770 N. El Camino Real, San Mateo	Eligible for NRHP / C; Criteria Considerations A and B	Circa 1870

Name Address	NRHP Eligibility / Criteria ¹	Period of Significance ²
Two Clark Drive Apartments 2 Clark Drive, San Mateo	Eligible for NRHP / C	1961
Royal Pines Apartments 525 N. El Camino Real, San Mateo	Eligible for NRHP / C	1959
El Camino Real Bell Guideposts	N/A: CEQA Only Resource	N/A
The Marquis Apartments 1439 El Camino Real, Burlingame	N/A: CEQA Only Resource	1962
Hillside Manor 1500 Hillside Drive, Burlingame	N/A: CEQA Only Resource	1964
1246 El Camino Real, Burlingame	N/A: CEQA Only Resource	1929

Notes:

1. NRHP Criteria:

A: Associated with events that have made a significant contribution to the broad patterns of our history.

B: Associated with the lives of persons significant in our past.

C: Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

NRHP Criteria Considerations

A: Associated with events that have made a significant contribution to the broad patterns of our history.

B: Associated with the lives of persons significant in our past.

C: Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

D: A cemetery which derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events.

E: A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived.

F: A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance.

G: A property achieving significance within the past 50 years if it is of exceptional importance.

2. All resources listed are significant at the local level.

Howard-Ralston Eucalyptus Tree Rows, Burlingame and Hillsborough

The Howard-Ralston Eucalyptus Tree Rows along El Camino Real in the City of Burlingame and the Town of Hillsborough is listed in the NRHP (NRHP #12000127) and is a Caltrans-owned resource on the Master List of Historical Resources per PRC 5024. The Howard-Ralston Eucalyptus Tree Rows is listed under NRHP Criterion A for its association with the founding of the City of Burlingame and Town of Hillsborough and under Criterion C as an excellent example of master landscape gardener John McLaren's early work. The period of significance for the Howard-Ralston Eucalyptus Tree Rows is 1873, the first year the trees were planted, to 1930, when voters elected officials to create zoning restrictions to prohibit commercial development along El Camino Real/SR 82 to save the Howard-Ralston Eucalyptus Tree Rows. The Howard-Ralston Eucalyptus Tree Rows begin at Peninsula Avenue (PM 12.3) and end at Ray Drive/Rosedale Avenue (PM 15.9). The Howard-Ralston Eucalyptus Tree Rows today consist of 391 trees, 252 of which are original trees (238 eucalyptus, 14 elms) and 139 are new replacement elm trees.

Easton Drive Eucalyptus Tree Rows, Burlingame

The Easton Drive Eucalyptus Tree Rows, between El Camino Real and Vancouver Avenue in the City of Burlingame, is assumed eligible for the NRHP under Criterion C as an excellent example of master landscape gardener John McLaren's early work. The period of significance for the Easton Drive Eucalyptus Tree Rows is 1873 to 1876 when the trees were planted.

1479 El Camino Real, Burlingame

The Adeline Apartments at 1479 El Camino Real, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as a rare surviving example of Dingbat architecture that retains a high level of historic integrity and as an important local example of a multi-story, multi-family building designed by Danish-born architect Mogens Mogensen, American Institute of Architects (AIA). Its period of significance is 1958. The boundary of the property is its legal parcel. The character-defining features are its footprint and form, scale and massing, flat roof, stone veneer façade, Adeline Apartments signage, vertical wood pilasters and projecting wood trellis, cantilevered wood frame balconies and railings, concrete terrace with low stone wall/planter along the facade, and yucca trees within the setback of the property.

1265 El Camino Real, Burlingame

This property consists of a Monterey style apartment house constructed in 1938, a Minimal Traditional Stucco Box-type ancillary building with Monterey style details constructed in 1946, and associated landscaping at 1265 El Camino Real, Burlingame. The property is eligible for inclusion in the NRHP at the local level of significance under Criterion A as an excellent example of 1930s and post-war multi-family residential development along El Camino Real in the City of Burlingame and under Criterion C as an excellent example of a Monterey style apartment house constructed in 1938 with a relatively high-style Minimal Traditional Stucco Box-type ancillary building with Monterey style details, and their associated landscaping.

The deep setback of the apartment house from El Camino Real with the curved driveway, lawn, and ornamental plantings is a rare feature for properties along the busy transportation corridor and serves as a stark visual contrast to the densely built-up surroundings. Overall, the property retains a high level of historic integrity to its periods of significance (1938 and 1946). The character-defining features of this property are the footprint and form; small scale and massing of the apartment house and the ancillary building; the location of the ancillary building behind the apartment house; and the deep setback of the apartment house from El Camino Real with the curved driveway, lawn, and ornamental plantings. Character-defining features of the apartment house are the symmetrical façade with a centrally located entry; horizontal wood board and wood shingle siding; entry with five-light double doors between full-height, decorative wood shutters and crowned by a simple cornice; façade bays; two wood-frame Monterey style balconies and French doors that access them; and the octagonal and narrow, three-light wood frame casements on the façade. Character-defining features of the ancillary building is the stucco siding; original multi-light casement, double-hung and fixed wood windows flanked by decorative wood shutters; metal balconet; cantilevered upper story with decorative wood braces; Spanish tile recessed central entry; gable-roofed porches; and original overhead tilt-up wood garage doors.

1136 El Camino Real, Burlingame

The El Camino apartment house at 1136 El Camino Real, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as an excellent example of 1920s/1930s Revival style suburban apartment house architecture in the City of Burlingame. Its period of significance is 1928. The boundaries of the property are its legal parcel. The character-defining features are its footprint and form, scale and massing, thick stucco siding, Mission style parapet with red tile on the two-story bay on the façade, wood frame casement windows, metal balconets, and the external chimney on the façade

1124 El Camino Real, Burlingame

La Solana apartment house at 1124 El Camino Real, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as an excellent example of 1920s/1930s Revival style suburban apartment house architecture in the City of Burlingame. Its period of significance is 1930. The boundaries of the property are its legal parcel. The character-defining features are its footprint and form, scale and massing, thick stucco siding, red tile roof, two-story bays with decorative angles wood brackets, wood frame casement windows, balconies, and the integrated garage with vertical wood plank doors with small metal grilles.

1045 El Camino Real, Burlingame

The apartment house at 1045 El Camino Real, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as an excellent example of 1920s/1930s European Eclectic style suburban apartment house architecture in the City of Burlingame. Its period of significance is 1936. The boundaries of the property are its legal parcel. The character-defining features are its footprint and form; scale and massing; stucco siding with quoins on the first floor of the façade; pent roof; Flemish ends and brick chimneys; circular, arched, and spade-shaped wood windows with fixed and casement operation; metal balconets; and decorative metal grilles on the third-story circular windows. The carport at the rear of the property is not a character-defining feature, nor is the landscaping along the façade of the apartment house.

1041 El Camino Real, Burlingame

The Craftsman Bungalow single-family residence at 1041 El Camino Real, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion A as a rare, surviving example of early single-family residential development along El Camino Real in the City of Burlingame. The deep setback of the house from El Camino Real and the mature trees in the front yard are rare features for properties along the busy transportation corridor and serve as a stark visual contrast to the densely built-up surroundings. The period of significance is 1924. The boundaries of the property are its legal parcel. The character-defining features are its footprint and form, small scale and massing, horizontal wood board and wood shingle siding, gable roof porch, row of tall sash windows in the sunroom, deep setback from the street, mature trees and landscaping in the front yard, and wood picket fence.

1021 El Camino Real, Burlingame

El Rey Apartments at 1021 El Camino Real, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as an excellent example of 1920s/1930s Spanish Revival style suburban apartment house architecture in the City of Burlingame. Its period of significance is 1931. The boundaries of the property are its legal parcel. The character-defining features are its footprint and form, scale and massing, troweled stucco siding, multi-pane wood casements with transoms and wood sashes, French doors, decorative iron window grilles, oriel window with red clay barrel roof tiles, and clay tiles that accent other roof sections, Plateresque door surround, arched wall openings, and integrated parking on the ground level with arched vehicular opening. The carport, which was constructed between 1949 and 1956, and the landscaping are not character-defining features of the apartment house.

1501 Forest View Avenue, Burlingame

The apartment house at 1501 Forest View Avenue, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as an excellent example of

1920s/1930s Revival and Classical style suburban apartment house architecture in the City of Burlingame. Its period of significance is 1931. The boundaries of the property are its legal parcel. The character-defining features are its footprint and form, scale and massing, symmetrical façade, thick stucco siding, flat roof with parapet with pent sections clad in red clay tiles along the façade, simplified pilasters with decorative Classical-inspired corbels, flat roof porch hood with cornices sheltering the entrance, multi-pane wood front door with arched multi-pane sidelights, and wood frame windows. The detached carport and the landscaping planted within the setback from Forest View Avenue are not character-defining features.

1430 Palm Drive, Burlingame

New Life Community Church at 1430 Palm Drive, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as an important example of Spanish Colonial Revival architecture in the City of Burlingame designed by master architectural firm Willis Polk & Company. The period of significance is 1930 to 1950. The boundaries of the property are its legal parcel. The character-defining features are the hand troweled stucco exterior, offset four-story tower with arcaded windows at the top of the tower, Spanish clay tile roof, large rose-style window divided by floral petals above the main entry, Neo-Gothic style coping below the roof eave in the tower and gable front of the school, arched wood doors, decorative columns, arched metal windows and triple, rectangular, divided-light metal casement windows throughout. The building also meets NRHP Criterion Consideration A.

744 El Camino Real, Burlingame

Russian Church of All Saints at 744 El Camino Real, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as a rare example of Russian-influenced architecture in the City of Burlingame constructed in the 1960s. The period of significance is 1963. The boundaries of the property are its legal parcel. The character-defining features are its massing, smooth stucco exterior with recessed arches, onion domes on corner towers and central tower capped with Orthodox crosses, exterior murals, decorative main entrance doors, and low-sloped gable rooflines with wide overhangs. The perimeter fence built in 1967 is not a character-defining feature. The building also meets NRHP Criterion Consideration A.

1515 Arc Way, Burlingame

The Arcamino West apartment building at 1515 Arc Way, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion A for its contribution to the broad patterns of Burlingame history. The building is associated with the local fight against high-rise apartments in residential areas along El Camino Real, which ultimately prevented further high-rise apartment tower development along the corridor. It is also eligible for inclusion in the NRHP at the local level of significance under Criterion C as a rare example of New Formalism multi-family residential architecture in the City of Burlingame. Its period of significance is 1961 to 1964. The boundaries of the property are its legal parcel. The character-defining features are the full-height recessed arches on the exterior, the heavy flat roof, the first-story parking with units above, the exterior lanai balconies with solid panels visually connected with vertical supports, and the parabolic canopy to the lobby entrance.

1615 Floribunda Avenue, Hillsborough

The Sharon Estate Speculative House/Newlands Estate, 1615 Floribunda Avenue, Hillsborough, was determined eligible for inclusion in the NRHP at the local level of significance under both Criterion A for its association with the planning and development of the Town of Hillsborough and the City of Burlingame and Criterion C for residential architecture and the work of a master, A. Page Brown. Its period of significance is 1893 to the 1940s. The boundaries of the property are its legal parcel. Previous recordations did not identify character-defining features of the residence. However, they appear to be its footprint and form; cross-gable and gable roof dormers on the symmetrical façade; verge boards in the gables; smooth stucco siding with half-timbering; second-story balustrade on the façade; curved knee-brackets; wood framed casement and double-hung windows, some with diamond-pane leaded glass; and oriel windows next to the primary entry door. Curvilinear half-timbering added in the 1990s, a two-story addition at the rear, and a garage addition are not character-defining features of the property.

50 Kammerer Court, Hillsborough

The Sharon Estate Speculative House/A. Page Brown Cottage, 50 Kammerer Court, Hillsborough, was determined eligible for inclusion in the NRHP at the local level of significance under both Criterion A for its association with the planning and development of the Town of Hillsborough and the City of Burlingame and Criterion C for residential architecture and the work of a master, A. Page Brown. Its period of significance is 1893 to the 1940s. The boundaries of the property are its legal parcel. Previous recordations did not identify character-defining features of the residence. However, they appear to be its footprint and form; cross-gable roofs; symmetrical façade; boards in the gables; smooth stucco siding with half-timbering; wood framed casement, double-hung, and arched windows, some with diamond-pane leaded glass; and single-story glass-enclosed porch on the west end. The modern gate entry is not a character-defining feature. Caltrans Office of Cultural Resources identified character-defining and non-character-defining features of the property in 1999 as: “The dirt path at the north boundary of the property and the adjacent modern-era wall are not contributors to its historic significance; neither is the modern gate at the Kammerer Court entrance to the property (Kostura 1999). The eucalyptus trees on El Camino Real were planted before the house was built, and contribute to its historic setting, but do so in a minor way, as they are separated from the house by the modern-era wall.”

500 El Camino Real, Burlingame

The Viking apartment building at 500 El Camino Real, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as an important local example of a multi-story, multi-family building designed by Danish-born architect Mogens Mogensen. Its period of significance is 1958. The boundaries of the property are its legal parcel. The character-defining features are its footprint and form, scale and massing, tuck-under parking, stepped-height building sections, flat roofs, wood frame curtain walls with plastic laminate panels and windows, tile entry wall, board-and-batten entry wall, and sculptural dingbat. The landscaping on the property is not a character-defining feature.

415 El Camino Real, Burlingame

The religious buildings on the St. Paul’s Episcopal Church complex at 415 El Camino Real, Burlingame, are eligible for inclusion in the NRHP at the local level under both Criteria B and C

as a rare example of Late Gothic Revival architecture in the City of Burlingame. The period of significance is 1936 to 1953. The boundary of the historical resources are the footprints of the religious buildings. The character-defining features are the footprint and form, scale and massing, scored stucco exteriors to mimic stone, steeply pitched roofs with parapets and slate tiles, the three-story steeple church tower with pinnacles and battlements, buttresses, stained-glass lancet windows with traceries, stained-glass rose window, heavy wood door entrances, multi-light windows, toothed quoins, and window crowns. The building at 405 El Camino Real within the legal parcel of church property was acquired in 1960 and is not a character-defining feature of, or a contributor to, the historical resource. Neither the landscaping within the parcel boundary nor the trees in the El Camino Real right-of-way are character-defining features. The complex also meets NRHP Criterion Consideration A.

405 El Camino Real, Burlingame

The former office and residence of Dr. A.L. Lachman at 405 El Camino Real, Burlingame, is eligible for inclusion in the NRHP at the local level under Criterion C as a rare surviving example of 1930s Colonial Revival commercial architecture in the City of Burlingame. The period of significance is circa 1934. The boundaries of the property are the footprint of the building. The character-defining features are its footprint and form, scale and massing, stucco siding, cross-gable roof system, two small gable-roof dormers with vents, symmetrical façade with the arched porch hood, wood frame casement windows, and flat roof porches with paired pilasters and plain cornices on the façade. The use of the building changed in 1960 from a doctor's office and residence to the Nursey School for St. Paul's Episcopal Church, so it no longer retains integrity of association, but it retains sufficient physical features to convey its significance.

1469 Bellevue Avenue, Burlingame

The Burlingame Towers high-rise apartment building at 1469 Bellevue Avenue, Burlingame is eligible for inclusion in the NRHP at the local level of significance under Criterion A for its contribution to the broad patterns of Burlingame history. The building is associated with the local fight against high-rise apartments in residential areas along El Camino Real, which ultimately prevented further high-rise apartment tower development along the corridor. It is also eligible for inclusion in the NRHP at the local level of significance under Criterion C as a rare example of high-rise apartment tower construction in the City of Burlingame. Burlingame Towers is the only apartment building that was granted a height variance over four stories and is also the tallest building in the City of Burlingame. Its period of significance is 1962. The boundaries of the property are its legal parcel. The character-defining features are its location on El Camino Real, rectangular footprint, eight stories and parking area, cantilevered balconies, curtain wall system with aluminum frame windows sets and spandrels, and decorative concrete screen block in the north tower and parking area.

1443 Howard Avenue, Burlingame

The Burlingame United Methodist Church complex at 1443 Howard Avenue, Burlingame, is eligible for inclusion in the NRHP at the local level under Criterion C as a rare example of 1920s Romanesque Revival religious architecture in the City of Burlingame. The period of significance is 1925 to 1952. The boundaries of the historical resources are the footprints of the religious buildings. The character-defining features are the smooth stucco exterior, Spanish tile roof, arcaded corbel table below the roof lines, tall central tower/dome, round stained-glass window in

the gable end, heavy wood door entrances, decorative doorways, arched doorways and windows, multi-light windows, and massing. The complex also meets NRHP Criterion Consideration A.

120 El Camino Real, Burlingame

The former County Road Garage at 120 El Camino Real, Burlingame, is eligible for inclusion in the NRHP at the local level under Criterion C because it is a good example of 1920s Mission Revival commercial automotive architecture that retains a high level of historic integrity. The period of significance is 1929. The boundaries of the property are the footprint of the building. The character-defining features are its footprint and form, scale and massing, hump-and-bump troweled stucco pattern on the façade, Mission Revival shaped parapet on the façade, two window openings on the façade, and overhead garage door flanked by four large multi-light metal frame windows. A detached residence on the parcel is not a character-defining feature of the property.

90 El Camino Real, Burlingame

The office building at 90 El Camino Real, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as an important local example of a commercial building designed by Danish-born architect Mogens Mogensen. Its period of significance is 1963. The boundaries of the property are its legal parcel. The character-defining features are its footprint and form, scale and massing, floating foundation with subterranean parking, flat roof with wide overhang and a tall, plastic-paneled cornice, parabolic shaped roof vent, vertical grooved plywood siding, and aluminum frame windows with blue mosaic panels below, and light-green tile entry wall and planter.

15 Park Road, Burlingame

The apartment house at 15 Park Road, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as an excellent example of 1920s to 1930s Spanish Revival style suburban apartment house architecture in the City of Burlingame. Its period of significance is 1928. The boundaries of the property are its legal parcel. The character-defining features are its footprint and form, scale and massing, troweled stucco siding, flat roof with tile coping, Mission style parapet with red tile on the southeast elevation, recessed main entrance under the parapet, red tile gable roofs on façade and rear elevations, applied decorative tile in the parapet and gable roof projections, multi-light metal frame casement windows throughout, metal balconet in parapet projection, wood balconies, multi-light glazed wood balcony doors, single-light glazed wood doors, integrated garage with wood panel doors, decorative metal grilles on ground level windows, and full-height stuccoed chimney.

55 El Camino Real, Burlingame

The Carol at 55 El Camino Real, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as an important local example of a multi-story, multi-family building designed by Danish-born architect Mogens Mogensen. Its period of significance is 1961. The boundaries of the property are its legal parcel. The character-defining features are its footprint and form, scale and massing, subterranean parking, flat roof with wide boxed overhangs, walls clad with vertical grooved plywood siding, aluminum-frame curtain walls with fixed and one-over-one sash windows sets with two sizes and two colors of blue plastic laminate panels. The landscaping on the property is not a character-defining feature of the building.

1500-1504 Barroilhet Avenue, Burlingame

The duplex at 1500-1504 Barroilhet Avenue, Burlingame, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as a rare, surviving example of low-density multi-family housing. The property appears to be one of the few remaining of this building type and period that fully embodies the high-quality, early 1920s Revival style residential architecture in the City of Burlingame. The duplex exhibits high artistic value through a combination of Spanish Revival and Italian Renaissance Revival details. Its period of significance is 1922. The boundaries of the property are its legal parcel. The character-defining features of the duplex are its U-shaped footprint and form, scale and massing, stucco siding, tall water table, symmetrical stepped façade featuring two primary mirror-image entrances within the center courtyard, angled recessed main entries with arched openings and multi-light glazed wood doors, multi-light casement door adjacent to each main entrance, red tile roofs, applied vigas, rope pilasters, decorative chimney hoods capped with red clay tiles, three groups of multi-light wood frame casement windows topped by recessed arched and rectangular panels and cartouches, and eight-over-one and six-over-one wood sashes and six-pane wood casement windows. The detached garages' character-defining features are their footprint, form, scale, and massing, stucco cladding, flat parapet roofs with central pent roof with red clay tiles, one-car vehicular opening, and 12-light wood windows. The landscaping and hardscaping in the setbacks from El Camino Real and Barroilhet Avenue are not character-defining features.

770 North El Camino Real, San Mateo

St. Joseph Parish at 770 North El Camino Real, San Mateo, is eligible for inclusion in the NRHP at the local level under Criterion C as a rare example of nineteenth century Carpenter Gothic Revival architecture. The redwood-constructed church is one of the last surviving examples of this property type in the Bay Area. The period of significance is circa 1870. The boundaries of the property are its legal parcel. The character-defining features are its redwood-framed construction and exterior wide-wood boards, decorative-shaped wood shingle roof, symmetrical façade with offset tall steeple capped with a cross, buttresses, lancet window openings, oculus and lancet stained-glass windows, steep pitched front gable roof with no overhang, decorative finial topped with a cross at the gable peak of the façade, and shorter gable roof building section at the rear. It also meets NRHP Criteria Considerations A and B.

2 Clark Drive, San Mateo

Two Clark Drive Apartments at 2 Clark Drive, San Mateo, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as an important local example of a multi-story, multi-family building designed by Danish-born architect Mogens Mogensen. Its period of significance is 1961. The boundaries of the property are its legal parcel. The character-defining features are its footprint and form, scale and massing, flat roofs, aluminum frame curtain walls, and cantilevered balconies connected by vertical wood beams. The landscaping is not a character-defining feature of the building.

525 North El Camino Real, San Mateo

Royal Pines Apartments at 525 North El Camino Real, San Mateo, is eligible for inclusion in the NRHP at the local level of significance under Criterion C as an important local example of a multi-story, multi-family building designed by Danish-born architect Mogens Mogensen. Its period of significance is 1959. The boundaries of the property are its legal parcel. The character-

defining features are its footprint and form, scale and massing, stepped-height building sections, flat roofs, wood frame curtain walls with colored plastic laminate panels, and large angle concrete bends. The pine trees on the parcel are character-defining features of the property.

El Camino Real Bell Guideposts

The length of the El Camino Real from Mission San Francisco de Asis in San Francisco to Mission San Diego de Alcalá in San Diego (Primary Number P-38-002967) was designated California Historical Landmark (CHL) No. 784 in 1963, and it is listed in the CRHR and is a historical resource for the purposes of CEQA. As a whole, the resource lacks historic integrity for inclusion in the NRHP. The El Camino Real Guideposts are assumed to be contributors to CHL No. 784. CHLs 770 and above are automatically listed in the CRHR. The guideposts themselves do not appear to be individually significant, but they derive their assumed historic significance as part of the larger commemorative route.

1439 El Camino Real, Burlingame

The Marquis Apartments at 1439 El Camino Real, Burlingame, is eligible for inclusion in the CRHR at the local level of significance under Criterion 3 as an excellent example of Dingbat architecture in the City of Burlingame. The building has two small replacement windows on the primary façade, as well as throughout the building; however, the property as a whole retains sufficient historic character to convey its significance for listing in the CRHR. Its period of significance is 1962. The boundaries of the property are its legal parcel. The character-defining features are its footprint and form, scale and massing, tuck-under parking, flat roof with overhang, scored stucco façade and decorative Roman brick on the first level, affixed “The Marquis Apts.” signage and address number, the full-height metal screen, the window openings (but not the replacement windows), and the Himalayan Windmill palm planted in the setback from El Camino Real. The property is a CEQA-only historical resource.

1500 Hillside Drive Burlingame

The Hillside Manor apartment building at 1500 Hillside Drive, Burlingame, is eligible for inclusion in the CRHR at the local level of significance under Criterion 3 as an excellent example of Dingbat architecture in the City of Burlingame. The building has replacement windows throughout; however, the property as a whole retains sufficient historic character to convey its significance for listing in the CRHR. Its period of significance is 1964. The boundaries of the property are its legal parcel. The character-defining features are its footprint and form, scale and massing, tuck-under parking with original wood tilt up garage doors with applied geometric designed garage doors, aggregate tile and aggregate full-height panels on the primary north elevation, applied round ornamentation on the façade, full-height vertical wood frames flanking windows on the façade, concrete masonry block and decorative concrete screen block stairwells towers, and the Yucca plants, a Himalayan Windmill Palm, a mature Magnolia tree, large lava rocks, low shrubs planted in the setback from El Camino Real. The property is a CEQA-only historical resource.

1246 El Camino Real, Burlingame

The apartment house at 1246 El Camino Real, Burlingame, is eligible for inclusion in the CRHR at the local level of significance under Criterion 3 as a rare example of 1920s-1930s Colonial Revival style suburban apartment house architecture in the City of Burlingame. Minor alterations to the property including replacement windows in the dormers and removal of a chimney have

somewhat diminished the integrity of materials and design of the building; however, it retains sufficient historic character to physically convey its significance. Its period of significance is 1929. The boundaries of the property are its legal parcel. The character-defining features are its footprint and form, scale and massing, saltbox side-gable roof, narrow horizontal wood siding, symmetrical façade with a centrally located entry door with a porch shelter with balanced window sets, multi-light wood frame French door with fanlight pediment, multi-light wood frame windows on the façade with pedimented windows at the roof line, and small roof dormers. The detached circa 1978 building and the paved setback from El Camino Real are not character-defining features. The property is a CEQA-only historical resource.

3.1.6.3 Environmental Consequences

No Build Alternative

The No Build Alternative would not affect any cultural resources.

Build Alternative

The Build Alternative (either with or without inclusion of the design option) would not affect any archaeological resources or any tribal cultural resources.

Under the Build Alternative, the project would include sidewalk replacement, curb ramp upgrades, roadway pavement reconstruction, drainage work, installation of APS and CPS, as well as associated relocation, adjustment, and upgrading of traffic signal poles, light poles, signs, utility cabinets, fire hydrants, and other utilities (such as gas, fiber optic cables, sewer, and water lines). These actions have the potential to affect historic resources within the APE. Table 3.1.6-2 includes a summary of the preliminary effects determinations for these resources. Potential adverse effects resulting from the Build Alternative with or without the design option would be similar. Therefore, they are not discussed separately. The four resources listed with an “Adverse Effect” determination in Table 3.1.6-2 (including the Howard-Ralston Eucalyptus Tree Rows; 1479 El Camino Real, Burlingame; 1265 El Camino Real, Burlingame; and 1041 El Camino Real, Burlingame) are further described below. Caltrans sent the SHPO the Finding of Adverse Effect (FAE) on September 10, 2021 and received concurrence on the finding on November 18, 2021. Caltrans consulted with the SHPO to develop the Memorandum of Agreement (MOA), which was executed on February 17, 2022.

Table 3.1.6-2: Potential Effects Determinations under Section 106 of the NRHP to Historic Resources in the APE

Address/Name	Potential Effect
Howard-Ralston Eucalyptus Tree Rows NRHP #12000127	Adverse Effect. Loss of a substantial number of contributing trees and destruction of part of the historic property.
Easton Drive Eucalyptus Tree Rows	No Adverse Effect.
Adeline Apartments 1479 El Camino Real, Burlingame	Adverse Effect. Removal of character-defining features (concrete terrace, steps, and low stone wall/planter along the façade) from Caltrans’ right-of-way.

Address/Name	Potential Effect
1265 El Camino Real, Burlingame	Adverse Effect. Removal of character-defining features (setback, ornamental planting and curved driveway) from the existing Caltrans' right-of-way.
The El Camino 1136 El Camino Real, Burlingame	No Adverse Effect.
La Solana 1124 El Camino Real, Burlingame	No Adverse Effect.
1041 El Camino Real, Burlingame	Adverse Effect. Removal of character-defining features (wood picket fence, landscaping, and trees) from existing Caltrans' right-of-way.
1045 El Camino Real, Burlingame	No Adverse Effect.
El Rey Apartments 1021 El Camino Real, Burlingame	No Adverse Effect.
1501 Forest View Avenue, Burlingame	No Adverse Effect.
New Life Community Church 1430 Palm Drive, Burlingame	No Adverse Effect.
Arcamino West 1515 Arc Way, Burlingame	No Adverse Effect.
Russian Church of All Saints 744 El Camino Real, Burlingame	No Adverse Effect.
Sharon Estate Speculative House / Newlands Estate 1615 Floribunda Avenue, Hillsborough	No Effect.
Sharon Estate Speculative House / A. Page Brown Cottage 50 Kammerer Court, Hillsborough	No Effect.
Burlingame Towers 1469 Bellevue Avenue, Burlingame	No Adverse Effect.
The Viking 500 El Camino Real, Burlingame	No Adverse Effect.
St. Paul's Episcopal Church 415 El Camino Real, Burlingame	No Adverse Effect.
Former office and residence of Dr. A.L. Lachman 405 El Camino Real, Burlingame	No Adverse Effect.
United Methodist Church 1443 Howard Avenue, Burlingame	No Adverse Effect.
120 El Camino Real, Burlingame	No Adverse Effect.
90 El Camino Real, Burlingame	No Adverse Effect.
The Carol 55 El Camino Real, Burlingame	No Adverse Effect.
15 Park Road, Burlingame	No Adverse Effect.

Address/Name	Potential Effect
1500-1504 Barroilhet Avenue, Burlingame	No Adverse Effect.
St. Joseph Parish 770 North El Camino Real, San Mateo	No Adverse Effect.
Two Clark Drive Apartments 2 Clark Drive, San Mateo	No Adverse Effect.
Royal Pines Apartments 525 North El Camino Real, San Mateo	No Adverse Effect.
El Camino Real Bell Guideposts	Not subject to Section 106 of the NRHP. No Impact under CEQA.
The Marquis Apartments 1439 El Camino Real, Burlingame	Not subject to Section 106 of the NRHP. No Impact under CEQA.
Hillside Manor 1500 Hillside Drive, Burlingame	Not subject to Section 106 of the NRHP. No Impact under CEQA.
1246 El Camino Real, Burlingame	Not subject to Section 106 of the NRHP. No Impact under CEQA.

Howard-Ralston Eucalyptus Tree Rows, Burlingame and Hillsborough

The Build Alternative would introduce new visual elements of roadway and utilities infrastructure within the setting of the Howard-Ralston Eucalyptus Tree Rows. However, visual elements of the existing roadway and utilities infrastructure have already altered the setting in that in that these visual elements do not date to the resource’s period of significance. Implementation of the Build Alternative would result in the removal of approximately 250 of the 391 contributing trees in the NRHP-listed Howard-Ralston Eucalyptus Tree Rows. Tree removals were carefully considered with all available data including right-of-way, tree health, and preliminary design. Field surveys of existing trees were conducted to determine general condition of trees and their likely resilience to anticipated construction impacts. Through analysis of both tree health and the proximity of project construction activities, preliminary assessments of anticipated tree removals were generated. More information is found in Appendix F, Appendix J, and Appendix K.

The Build Alternative also has the potential to directly affect the roots of additional contributing trees that may be within the existing roadway. Potential damage to tree roots encountered during construction could result in additional unanticipated tree removal. Contributing eucalyptus and elm trees that require removal would be replaced as described in the *Replanting Plan* in Appendix F. However, the loss of contributing trees would constitute physical destruction of part of the historic resource. Removal of the contributing trees would diminish the integrity of location, design, materials, workmanship, feeling, and association of the Howard-Ralston Eucalyptus Tree Rows.

1479 El Camino Real, Burlingame

Implementation of the Build Alternative would require the removal of the character-defining concrete terrace with low stone wall/planter along the façade that currently exists within the Caltrans right-of-way adjacent to 1479 El Camino Real. This direct impact on a character-defining feature of the property would diminish the property's integrity of design, materials, and workmanship, resulting in an adverse effect to the historic resource. Implementation would also result in a change to physical features of the property's setting by removing contributing elements of the Howard-Ralston Eucalyptus Tree Rows that are adjacent to but not within the historic resource and by introducing new visual elements of roadway and utilities infrastructure. However, the significance of 1479 El Camino Real is derived from the building's architectural characteristics and its association with architect Mogens Mogensen; therefore, the indirect visual changes to the setting of the historic resource would not diminish its overall integrity or ability to convey its significance. In addition, implementation of the Build Alternative would not cause 1479 El Camino Real to be removed from its historic location.

Although implementation of the Build Alternative would alter the historic resource due to removal of one of its character-defining features within Caltrans' right-of-way, implementation would not result in substantial impairment of this historic resource to convey its significance. The remaining character-defining features (including its footprint and form, scale and massing, flat roof, stone veneer façade, "Adeline Apartments" signage, vertical wood pilasters and projecting wood trellis, cantilevered wood frame balconies and railings, and yucca trees within the setback of the property) would not be impacted by the Build Alternative. Therefore, implementation of the Build Alternative would not affect the eligibility of 1479 El Camino Real for inclusion on the NRHP.

1265 El Camino Real, Burlingame

Implementation of the Build Alternative would require the removal of existing character-defining features of 1265 El Camino Real, including the ornamental planting, and would alter the property's setback, curved driveway, and lawn, which are within the Caltrans right-of-way. The loss of these character-defining features would result in an adverse effect to the historic resource. However, the Howard-Ralston Eucalyptus Tree Rows does not contribute to 1265 El Camino Real's historic significance. The Build Alternative would introduce new visual elements of roadway and utilities infrastructure. However, visual elements of the roadway and utilities infrastructure would replace existing infrastructure that has already altered its setting and does not date to its period of significance. In addition, implementation of the Build Alternative would not cause the 1265 El Camino Real to be removed from its historic location.

Although implementation of the Build Alternative would result in an adverse effect to this historic resource due to removal of some of the character-defining features of the property within Caltrans' right-of-way, implementation would not result in substantial impairment of this historic resource. The remaining character-defining features of 1265 El Camino Real (including the footprint and form, small scale and massing of the apartment house and the ancillary building, and the location of the ancillary building behind the apartment house) would not be impacted. Therefore, implementation of the Build Alternative would not affect the eligibility of 1265 El Camino Real for inclusion on the NRHP.

1041 El Camino Real, Burlingame

Implementation of the Build Alternative would require the removal or alteration of the existing wood picket fence and landscaping that currently exists within the Caltrans right-of-way adjacent to 1041 El Camino Real. This direct impact on character-defining features of the property would diminish the property's setting, design, materials, workmanship, and feeling, resulting in an adverse effect to this historic resource. Implementation of either build alternative would also reconfigure the existing driveway within the existing Caltrans' right-of-way. However, this is not a character-defining feature of 1041 El Camino Real. Indirect impacts would include potential removal of adjacent historic trees that are contributing elements of the Howard-Ralston Eucalyptus Tree Rows. However, the Howard-Ralston Eucalyptus Tree Rows does not contribute to the 1041 El Camino Real's historic significance. In addition, implementation of the Build Alternative would not cause the 1041 El Camino Real to be removed from its historic location.

Although implementation of the Build Alternative would result in an adverse effect to 1041 El Camino Real due to removal of some of the character-defining features of the property within Caltrans' right-of-way, implementation would not result in substantial impairment of this historic resource. The remaining character-defining features (including its footprint and form, small scale and massing, horizontal wood board and wood shingle siding, gable roof porch, row of tall sash windows in the sunroom, deep setback from the street, and mature trees in the front yard) would not be impacted by the Build Alternative. Therefore, implementation of the Build Alternative would not affect the eligibility of 1041 El Camino Real for inclusion on the NRHP.

Additional Resources

The Build Alternative would require TCEs to conform existing driveways to the new sidewalk configuration or to expand the sidewalk into landscaping within state right-of-way at five historic resources in the City of Burlingame within the project limits, including 1124 El Camino Real, 1045 El Camino Real, 1021 El Camino Real, 1246 El Camino Real, and 1501 Forest View Avenue. However, project-related construction within the TCEs would not affect the character-defining features of these historic resources.

As described in Section 2.1.1.3, historic resources with character-defining features that are close to state right-of-way will be protected from construction impacts through the use of high-visibility exclusion fencing and will be designated as Environmentally Sensitive Areas (ESAs) as appropriate. ESAs will be placed at the following three locations: 1500-1504 Barroilhet Ave, Burlingame, 770 N. El Camino Real, San Mateo, and 525 N. El Camino Real, San Mateo.

The Build Alternative with and without the design option would result in an overall Finding of Adverse Effect to cultural resources.

For a discussion of impacts to historic resources that also qualify for protection under Section 4(f), please refer to Appendix A.

3.1.6.4 Avoidance, Minimization, and/or Mitigation Measures

VIS-1 Will minimize effects to contributing trees to the Howard-Ralston Eucalyptus Tree Rows (see Section 3.1.5.4).

CUL-1. To emphasize the importance of cultural resources and the purpose and necessity of protecting them, prior to construction, all construction personnel will be instructed on the protection and avoidance of cultural resources, including state and federal laws regarding cultural resources. This will include a review of the locations of environmentally sensitive areas (ESAs) and what is being protected at each location. Caltrans will establish Environmentally Sensitive Areas (ESA)s for the preservation in place of; 1500-1504 Barroilhet, Burlingame, 770 N. El Camino Real (St. Joseph's Church), San Mateo, and 525 N. El Camino Real (Royal Pines Apartments), San Mateo.

CUL-2. Mitigation Measures VIS-1, VIS-2, and VIS-5 (the Howard-Ralston Eucalyptus Tree Rows Management Plan), will be done in accordance with The Secretary of the Interior's Standards (SOIS) for the Treatment of Historic Properties, where possible (see Section 3.1.5.4). To support the development of the Management Plan, Caltrans will host a public meeting during the design phase to solicit input from consulting parties and the public on the tree type selection. The Management Plan will include an inventory of all trees within the Tree Rows, both those that do and do not contribute to the National Register of Historic Places (NRHP) listed property; along with long term treatment, maintenance and protections for the Tree Rows to ensure their long term survival and continued listing on the NRHP. The Management Plan will be completed within two years following the end of construction and will be effective for twenty years following the execution of the management plan. The Management Plan will be developed in consultation with the City of Burlingame and the Burlingame Historical Society.

CUL-3. Caltrans will prepare an Historic American Landscape Survey (HALS) for the Howard-Ralston Eucalyptus Tree Rows, and Historic American Building Surveys (HABS) for 1479 El Camino Real, Burlingame, 1265 El Camino Real, Burlingame, and 1041 El Camino Real, Burlingame. Where possible Caltrans will minimize the adverse effects to these properties by utilizing the completed HALS/HABS to ensure that features altered, removed or demolished by the project will be replaced, or reconstructed, where possible, in accordance with the SOIS for the Rehabilitation of Historic Properties.

CUL-4. Caltrans District 4 will complete an NRHP Nomination update for the Howard-Ralston Eucalyptus Tree Rows. Recordation of the historic property and completion of the nomination update will occur following the conclusion of construction and will include consultation with the Burlingame Historical Society.

CUL-5. Caltrans District 4 will develop an El Camino Real Historic Resource Management Plan, for State Route 82 between PMs 13.00 and 15.20, in the City of Burlingame. The Management Plan will outline the post project conditions, regulatory framework including ties to the City of Burlingame General Plan, identification of historic resources in the corridor, previous survey efforts, and suggestions and recommendations for the future management of the corridor.

CUL-6. Utilizing the photographs produced for the HALS document pursuant to CUL-3, in addition to periodic photography completed during and after construction, Caltrans District 4 will document the removal and replacement of trees within the Howard-Ralston Eucalyptus Tree Rows to create an archival record of the project and its effects to the Historic Property. This will be completed in consultation with the City of Burlingame, and the Burlingame Historical Society.

CUL-7. Caltrans District 4, in consultation with the City of Burlingame, the Burlingame Historical Society, and local Native American Tribes, will develop a walking tour which will incorporate interpretive panels, wayfinding signs, sidewalk plaques or other signage. The tour will include the history of local Native American Tribes, El Camino Real, the Howard-Ralston Eucalyptus Tree Rows, Chinese contributions to the area, the City of Burlingame and historic architectural styles found within the project limits. The signage will be installed during construction, and the walking tour completed after construction. The tour outline and interpretive language will be submitted to the SHPO and other consulting parties for review.

CUL-8. Caltrans District 4 will coordinate the placement of a time capsule within the Caltrans' right-of-way or other publicly accessible location. Details on placement, when the capsule will be opened, and by whom will be finalized during final design. The procedures and location of the time capsule will be developed in consultation with the Burlingame Historical Society and the City of Burlingame. Input from the cities of Millbrae, Hillsborough and San Mateo, the public, local groups, and schools will be solicited to select items to place in the time capsule. The time capsule will be buried following construction.

CUL-9. Caltrans will install two benches within the project corridor constructed of reclaimed lumber from the removed trees within the Howard-Ralston Eucalyptus Tree Rows. Design and placement of the benches will be developed in consultation with the City of Burlingame and the Burlingame Historical Society.

3.2 Physical Environment

3.2.1 Hydrology and Floodplain

3.2.1.1 Regulatory Setting

Executive Order (EO) 11988 (Floodplain Management) directs all federal agencies to refrain from conducting, supporting, or allowing actions in floodplains unless it is the only practicable alternative. The Federal Highway Administration (FHWA) requirements for compliance are outlined in 23 Code of Federal Regulations (CFR) 650 Subpart A.

To comply, the following must be analyzed:

- The practicability of alternatives to any longitudinal encroachments.
- Risks of the action.
- Impacts on natural and beneficial floodplain values.
- Support of incompatible floodplain development.
- Measures to minimize floodplain impacts and to preserve/restore any beneficial floodplain values affected by the project.

The base floodplain is defined as “the area subject to flooding by the flood or tide having a one percent chance of being exceeded in any given year.” An encroachment is defined as “an action within the limits of the base floodplain.”

3.2.1.2 Affected Environment

The following discussion is based on the Hydraulics Memorandum (Caltrans 2019d) for the project, which was completed in August 2019; the Natural Environment Study-Minimal Impacts (Caltrans 2021c) which was completed in October 2020; and the Water Quality Study (Caltrans 2020d) which was completed in December 2020.

There are four waterways that cross or abut El Camino Real within the project limits and that have a potential to flood. They are described from south to north and are shown as blue lines that appear perpendicular to El Camino Real in Figure 3.2.1-1. Between Howard Avenue and Ralston Avenue beginning on the southbound side of El Camino Real, Cherry Canyon Creek stretches for three blocks. It is an unnatural intermittent stream bed with a dirt and concrete bottom and 20-foot-high brick sides. Sanchez Creek, an intermittent streambed with a dirt and rock bottom with 20-foot-high brick sides, is between Sanchez Avenue and Carmelita Avenue. Easton Creek, an intermittent streambed, is between Sherman Avenue and Lincoln Avenue. Neither Sanchez Creek nor Easton Creek is visible from El Camino Real. El Camino Real crosses over Mills Creek which is located between Adeline Drive and Ray Drive. Mills Creek is an intermittent streambed that flows under El Camino Real.



Figure 3.2.1-1: Flood Hazard Zones within the Project Limits

Floodplains

As determined from FEMA Flood Insurance Rate Maps, Special Flood Hazard Area Zone A floodplains were identified adjacent to the project limits (FEMA 2021). They are associated with four waterways shown as Zone A in Figure 3.2.1-1.

Zone A regions represent special flood hazard areas where no base flood elevation has been identified. Zone X areas are also present within the project limits. Zone X represents either areas of minimal flood hazard or areas of moderate flood hazard with an annual chance of flooding of 0.2 percent.

Except for the waterways noted above, El Camino Real overlaps Zone X (0.2 percent annual chance of flooding) from Peninsula Avenue to Murchison Drive. The portions of the project limits that are not Zone A or Zone X (with a 0.2 percent annual chance of flooding) are designated Zone X with a minimal flood hazard.

Natural and Beneficial Floodplain Values

The waterways in or near the project limits provide the beneficial use of groundwater recharge and help to support diverse vegetation such as large trees growing in between houses in the City of Burlingame.

3.2.1.3 Environmental Consequences

No Build Alternative

The No Build Alternative would not affect the floodplains within the project limits.

Build Alternative

The Build Alternative (either with or without inclusion of the design option) would not add new impervious surfaces within the project limits, nor would it remove access to existing drainages. In addition, the Build Alternative would improve existing roadway drainage facilities and reduce roadway flooding.

Longitudinal Encroachment

FHWA defines a longitudinal encroachment as an action within the limits of the base floodplain that is longitudinal to the normal direction of the floodplain. That is, a longitudinal encroachment is an encroachment that is parallel to the direction of water flow. For instance, a location where a highway runs along the edge of a river, when the river swells and floods, it is likely to flood the highway. In this example, the highway is encroaching into the floodplain of the river, so the highway would be considered a longitudinal encroachment. El Camino Real does not represent a longitudinal encroachment to any waterway within the project limits.

The Build Alternative does not propose project features that would increase the risk of flooding. There would be no encroachment into the floodplain.

Risks of the Action

The project would not result in risks associated with hydrology and floodplains.

Natural and Beneficial Floodplain Values

The Build Alternative does not propose features or construction in any areas designated as Zone A. Therefore, the Build Alternative would not affect the natural and beneficial floodplain values. None of the waterways below or near the roadway would be changed by the project.

Incompatible Floodplain Development

The project would follow the existing El Camino Real roadway within the project limits and would not create new access to developed or undeveloped land in the flood zone. Therefore, the project would not support incompatible floodplain development.

Measures for Floodplain Impacts/Values

No measures are needed to minimize floodplain impacts or to preserve/restore beneficial floodplain values.

3.2.1.4 Avoidance, Minimization and/or Mitigation Measures

No avoidance, minimization, or mitigation is required.

3.2.2 Water Quality and Storm Water Runoff

3.2.2.1 Regulatory Setting

Federal Requirements: Clean Water Act

In 1972, Congress amended the Federal Water Pollution Control Act, making the addition of pollutants to the waters of the United States (U.S.) from any point source unlawful unless the discharge complies with an NPDES permit. This act and its amendments are known today as the Clean Water Act (CWA). Congress has amended the act several times. In the 1987 amendments, Congress directed dischargers of storm water from municipal and industrial/construction point sources to comply with the NPDES permit scheme. The following are important CWA sections:

- Sections 303 and 304 require states to issue water quality standards, criteria, and guidelines.
- Section 401 requires an applicant for a federal license or permit to conduct any activity that may result in a discharge to waters of the U.S. to obtain certification from the state that the discharge will comply with other provisions of the act. This is most frequently required in tandem with a Section 404 permit request (see below).
- Section 402 establishes the NPDES, a permitting system for the discharges (except for dredge or fill material) of any pollutant into waters of the U.S. RWQCBs administer this permitting program in California. Section 402(p) requires permits for discharges of storm water from industrial/construction and municipal separate storm sewer systems (MS4s).
- Section 404 establishes a permit program for the discharge of dredge or fill material into waters of the U.S. This permit program is administered by the USACE.

The goal of the CWA is “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.”

The USACE issues two types of 404 permits: general and individual. There are two types of general permits: Regional and Nationwide. Regional permits are issued for a general category of activities when they are similar in nature and cause minimal environmental effect. Nationwide permits are issued to allow a variety of minor project activities with no more than minimal effects.

Ordinarily, projects that do not meet the criteria for a Regional or Nationwide permit may be permitted under one of the USACE’s Individual permits. There are two types of Individual permits: Standard permits and Letters of Permission. For Individual permits, the USACE decision to approve is based on compliance with United States Environmental Protection Agency’s (U.S. EPA) Section 404 (b)(1) Guidelines (40 CFR Part 230), and whether permit approval is in the public interest. The Section 404(b)(1) Guidelines (Guidelines) were developed by the U.S. EPA in conjunction with the USACE and allow the discharge of dredged or fill material into the aquatic system (waters of the U.S.) only if there is no practicable alternative which would have less adverse effects. The Guidelines state that the USACE may not issue a permit if there is a least environmentally damaging practicable alternative (LEDPA) to the proposed discharge that would have lesser effects on waters of the U.S. and not have any other significant adverse environmental consequences. According to the Guidelines, documentation is

needed that a sequence of avoidance, minimization, and compensation measures has been followed, in that order. The Guidelines also restrict permitting activities that violate water quality or toxic effluent¹ standards, jeopardize the continued existence of listed species, violate marine sanctuary protections, or cause “significant degradation” to waters of the U.S. In addition, every permit from the USACE, even if not subject to the Section 404(b)(1) Guidelines, must meet general requirements. See 33 CFR 320.4. A discussion of the LEDPA determination, if any, for the document is included in the [Wetlands and Other Waters](#) section.

State Requirements

Porter-Cologne Water Quality Control Act

California’s Porter-Cologne Act, enacted in 1969, provides the legal basis for water quality regulation within California. This act requires a “Report of Waste Discharge” for any discharge of waste (liquid, solid, or gaseous) to land or surface waters that may impair beneficial uses for surface and/or groundwater of the state. It predates the CWA and regulates discharges to waters of the state. Waters of the state include more than just waters of the U.S., like groundwater and surface waters not considered waters of the U.S. Additionally, it prohibits discharges of “waste” as defined, and this definition is broader than the CWA definition of “pollutant.” Discharges under the Porter-Cologne Act are permitted by Waste Discharge Requirements (WDRs) and may be required even when the discharge is already permitted or exempt under the CWA.

The State Water Resources Control Board (SWRCB) and RWQCBs are responsible for establishing water quality standards (objectives and beneficial uses) required by the CWA and regulating discharges to ensure compliance with water quality standards. Details about water quality standards in a project area are included in the applicable RWQCB Basin Plan. In California, RWQCBs designate beneficial uses for all water body segments in their jurisdictions and then set criteria necessary to protect those uses. As a result, the water quality standards developed for particular water segments are based on the designated use and vary depending on that use. In addition, the SWRCB identifies waters failing to meet standards for specific pollutants. These waters are then state-listed in accordance with CWA Section 303(d). If a state determines that waters are impaired for one or more constituents and the standards cannot be met through point source or nonpoint source controls (NPDES permits or WDRs), the CWA requires the establishment of Total Maximum Daily Loads (TMDLs). TMDLs specify allowable pollutant loads from all sources (point, nonpoint, and natural) for a given watershed.

State Water Resources Control Board and Regional Water Quality Control Boards

The SWRCB administers water rights, sets water pollution control policy, and issues water board orders on matters of statewide application, and oversees water quality functions throughout the state by approving Basin Plans, TMDLs, and NPDES permits. RWQCBs are responsible for protecting beneficial uses of water resources within their regional jurisdiction using planning, permitting, and enforcement authorities to meet this responsibility.

¹ The U.S. EPA defines “effluent” as “wastewater, treated or untreated, that flows out of a treatment plant, sewer, or industrial outfall.”

National Pollutant Discharge Elimination System (NPDES) Program

Municipal Separate Storm Sewer Systems (MS4)

Section 402(p) of the CWA requires the issuance of NPDES permits for five categories of storm water discharges, including MS4s. An MS4 is defined as “any conveyance or system of conveyances (roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, human-made channels, and storm drains) owned or operated by a state, city, town, county, or other public body having jurisdiction over storm water, that is designed or used for collecting or conveying storm water.” The SWRCB has identified Caltrans as an owner/operator of an MS4 under federal regulations. Caltrans’ MS4 permit covers all Caltrans rights-of-way, properties, facilities, and activities in the state. The SWRCB or the RWQCB issues NPDES permits for five years, and permit requirements remain active until a new permit has been adopted.

Caltrans MS4 Permit, Order No. 2012-0011-DWQ (adopted on September 19, 2012 and effective on July 1, 2013), as amended by Order No. 2014-0006-EXEC (effective January 17, 2014), Order No. 2014-0077-DWQ (effective May 20, 2014) and Order No. 2015-0036-EXEC (conformed and effective April 7, 2015) has three basic requirements:

1. Caltrans must comply with the requirements of the Construction General Permit (see below);
2. Caltrans must implement a year-round program in all parts of the state to effectively control storm water and non-storm water discharges; and
3. Caltrans storm water discharges must meet water quality standards through implementation of permanent and temporary (construction) BMPs to the maximum extent practicable, and other measures as the SWRCB determines to be necessary to meet the water quality standards.

To comply with the permit, Caltrans developed the Statewide Storm Water Management Plan (SWMP) to address storm water pollution controls related to highway planning, design, construction, and maintenance activities throughout California. The SWMP assigns responsibilities within Caltrans for implementing storm water management procedures and practices as well as training, public education and participation, monitoring and research, program evaluation, and reporting activities. The SWMP describes the minimum procedures and practices Caltrans uses to reduce pollutants in storm water and non-storm water discharges. It outlines procedures and responsibilities for protecting water quality, including the selection and implementation of BMPs. The proposed project will be programmed to follow the guidelines and procedures outlined in the latest SWMP to address storm water runoff.

Construction General Permit

Construction General Permit, Order No. 2009-0009-DWQ (adopted on September 2, 2009 and effective on July 1, 2010), as amended by Order No. 2010-0014-DWQ (effective February 14, 2011) and Order No. 2012-0006-DWQ (effective on July 17, 2012). The permit regulates storm water discharges from construction sites that result in a DSA of one acre or greater, and/or are smaller sites that are part of a larger common plan of development. By law, all storm water discharges associated with construction activity where clearing, grading, and

excavation result in soil disturbance of at least one acre must comply with the provisions of the Construction General Permit. Construction activity that results in soil disturbances of less than one acre is subject to this Construction General Permit if there is potential for significant water quality impairment resulting from the activity as determined by the RWQCB. Operators of regulated construction sites are required to develop SWPPPs; to implement sediment, erosion, and pollution prevention control measures; and to obtain coverage under the Construction General Permit.

The Construction General Permit separates projects into Risk Levels 1, 2, or 3. Risk levels are determined during the planning and design phases, and are based on potential erosion and transport to receiving waters. Requirements apply according to the risk level determined. For example, a Risk Level 3 (highest risk) project would require compulsory storm water runoff pH and turbidity monitoring, and before construction and after construction aquatic biological assessments during specified seasonal windows. For all projects subject to the permit, applicants are required to develop and implement an effective SWPPP. In accordance with Caltrans SWMP and Standard Specifications, a Water Pollution Control Program is necessary for projects with DSA less than one acre.

Under Section 401 of the CWA, any project requiring a federal license or permit that may result in a discharge to a water of the U.S. must obtain a 401 Certification, which certifies that the project will be in compliance with state water quality standards. The most common federal permits triggering 401 Certification are CWA Section 404 permits issued by the USACE. The 401 permit certifications are obtained from the appropriate RWQCB, dependent on the project location, and are required before the USACE issues a 404 permit.

In some cases, the RWQCB may have specific concerns with discharges associated with a project. As a result, the RWQCB may issue a set of requirements known as WDRs under the State Water Code (Porter-Cologne Act) that define activities, such as the inclusion of specific features, effluent limitations, monitoring, and plan submittals that are to be implemented for protecting or benefiting water quality. WDRs can be issued to address both permanent and temporary discharges of a project.

3.2.2.2 Affected Environment

This section is based on the Water Quality Study (Caltrans 2020d), District Preliminary Geotechnical Report (Caltrans 2020b), and Natural Environment Study-Minimal Impacts (Caltrans 2021c).

Surface Water Resources

The project is within the South Bay Hydrologic Unit, San Mateo Bayside Hydrologic Area, and Undefined Hydrologic Sub Area (HSA 204.4). The project is within the San Francisco Bay and the San Mateo Creek-Frontal San Francisco Bay Watershed. The watershed of San Mateo Creek has a drainage area of approximately 192 acres.

The project is in a Mediterranean climate region characterized by warm summers and mild wet winters, with the rainy season between October 15 and April 15. The project location experiences average minimum and maximum annual temperatures of 47.1 and 66.8 degrees

Fahrenheit (°F), respectively, with an average annual temperature of 56.95°F. The average annual precipitation is 20.16 inches, with the majority falling between December and February.

San Mateo Creek and San Francisco Bay are the receiving water bodies for the proposed work along SR 82. San Mateo Creek is 2,905 feet southeast of the project limits and flows in an eastward direction for a distance of 7,730 feet until outfall to the southern portion of San Francisco Bay.

San Francisco Bay is listed on the 2014-2016, 303(d) list of impaired water bodies. Both San Mateo Creek and San Francisco Bay are CWA Section 303(d) listed water bodies with limited water quality segments.

Beneficial uses for San Mateo Creek and its tributaries include freshwater replenishment, cold freshwater habitat, fish migration, preservation of rare and endangered species, fish spawning, warm freshwater habitat, wildlife habitat, and water recreation. Beneficial uses for the southern portion of San Francisco Bay include industrial service supply, commercial and sport fishing, shellfish harvesting, estuarine habitat, fish migration, preservation of rare and endangered species, fish spawning, wildlife habitat, water recreation, and navigation.

Groundwater Resources

The project is within the Westside Basin (Basin Number 2-35D). Beneficial uses for groundwater include municipal and domestic supply, industrial process supply, and industrial service supply. The groundwater depth varies greatly along El Camino Real within the project limits. Groundwater elevations change seasonally depending on the amount of rainfall but groundwater levels are assumed to be 8 feet below the existing ground surface. The main direction of groundwater flow is to the northeast.

3.2.2.3 Environmental Consequences

No Build Alternative

Short-Term (Construction) Impacts

No short-term water quality impacts would occur with the No Build Alternative because the No Build Alternative would not require any construction activities.

Long-Term (Permanent) Impacts

The No Build Alternative would have potential long-term water quality impacts due to existing inadequate drainage, which contributes to frequent, localized flooding on the roadway. Traffic operations would be maintained with the No Build Alternative but localized flooding and downed utility lines similar to what has been recorded in the past would continue to occur.

Roadway storm water runoff has the potential to affect receiving water quality. Heavy metals associated with vehicle tire and brake wear, oil and grease, and exhaust emissions are the primary pollutants associated with transportation corridors. Generally, roadway storm water runoff contains total suspended solids, nitrate nitrogen, total Kjeldahl nitrogen, phosphorus, ortho-phosphate, copper, lead, and zinc. The pollutants are dispersed from tree leaves, combustion products from fossil fuels, and the wearing of brake pads and tires.

Build Alternative

Short-Term (Construction) Impacts

The Build Alternative (either with or without inclusion of the design option) would have potential temporary impacts to existing water quality resulting from the release of fluids, concrete material, construction debris, sediment, and litter beyond the perimeter of staging and active construction areas. This has the potential to result in changes to localized pH and turbidity of San Mateo Creek. As described in Section 2.1.1.3, temporary construction site BMPs, such as silt fencing, fiber rolls, check dams, drainage inlet protections, concrete wash-outs, street sweeping, and job site management and construction entrances, would be used for sediment control and material management. Implementation of the temporary construction site BMPs would prevent or reduce sediments from entering nearby water bodies, such as from unintended discharge beyond the perimeter of the construction site, and would thereby reduce any substantial increase to localized pH and turbidity of San Mateo Creek.

The Build Alternative would result in 29.5 acres of disturbed soil area. Since the project's disturbed soil area is greater than 1.0 acre, a SWPPP will be required in the project's construction phase. Prior to commencement of construction activities, a SWPPP must be prepared by the contractor and approved by Caltrans. The SWPPP will address the temporary water quality impacts resulting from the construction activities via implementation of appropriate BMPs (such as those mentioned in Section 2.1.1.2), to the maximum extent practicable. BMPs incorporated into the SWPPP would include measures to reduce or prevent discharge of contaminants into storm water collection systems or waterways. The project is not expected to result in any in-water work and, therefore, no downstream water quality sampling and monitoring will be required.

The Build Alternative has the potential to encounter groundwater during the construction of cast-in-drilled-hole piles for traffic lights and other signs. This construction activity would require use of the slurry method, where a slurry/water is used to stabilize the holes for the piles. Any construction activity deeper than this may require dewatering. In addition, the design of replacement retaining walls would be tailored to the available slope to provide stability. Backfill or compaction of materials below any retaining wall structural sections would conform with the 2018 Caltrans standard specifications. Refined foundation recommendations will be detailed during final design.

With the BMPs described above, no short-term construction impacts to water quality are anticipated.

Long-Term (Permanent) Impacts

The Build Alternative would add no new impervious surfaces but would replace 24.4 acres of impervious surface. Since the total of new and replaced impervious surface is greater than 1.0 acre, the project will provide storm water treatment (i.e. bioretention or biofiltration devices) up to 24.4 acres to be in compliance with Caltrans NPDES permit requirements. The implementation of storm water treatment devices is expected to prevent long-term impacts of pollutant discharge to water bodies. Stormwater treatment devices, such as bioretention or biofiltration devices, would remove pollutants from project-related storm water runoff to avoid the potential to substantially alter drainage patterns, violate water quality standards, or

substantially degrade water quality. Construction details for these design features will be incorporated into the final project design documents.

The project limits have not been identified as a Significant Trash Generation Area (areas identified by Caltrans and concurred by the State Water Resources Control Board as contributing trash to the state's waterways), therefore Trash Capture is not required. However, final trash capture requirements will be determined during final design.

In summary, due to implementation of storm water treatment devices, there will be no new long-term impacts to existing water quality caused by deposition or transport of sediment and vehicular-related pollutants. The Build Alternative is not anticipated to result in a long-term impact to water quality.

3.2.2.4 Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization, or mitigation is required.

3.2.3 Hazardous Waste/Materials

3.2.3.1 Regulatory Setting

Hazardous materials, including hazardous substances and wastes, are regulated by many state and federal laws. Statutes govern the generation, treatment, storage, and disposal of hazardous materials, substances, and waste, and also the investigation and mitigation of waste releases, air and water quality, human health, and land use.

The primary federal laws regulating hazardous wastes/materials are the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, and the Resource Conservation and Recovery Act (RCRA) of 1976. The purpose of CERCLA, often referred to as “Superfund,” is to identify and cleanup abandoned contaminated sites so that public health and welfare are not compromised. The RCRA provides for “cradle to grave” regulation of hazardous waste generated by operating entities. Other federal laws include:

- Community Environmental Response Facilitation Act (CERFA) of 1992
- Clean Water Act
- Clean Air Act
- Safe Drinking Water Act
- Occupational Safety and Health Act (OSHA)
- Atomic Energy Act
- Toxic Substances Control Act (TSCA)
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

In addition to the acts listed above, Executive Order (EO) 12088, Federal Compliance with Pollution Control Standards, mandates that necessary actions be taken to prevent and control environmental pollution when federal activities or federal facilities are involved.

California regulates hazardous materials, waste, and substances under the authority of the CA Health and Safety Code and is also authorized by the federal government to implement RCRA in the state. California law also addresses specific handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning of hazardous waste. The Porter-Cologne Water Quality Control Act also restricts disposal of wastes and requires cleanup of wastes that are below hazardous waste concentrations but could impact ground and surface water quality. California regulations that address waste management and prevention and cleanup of contamination include Title 22 Division 4.5 Environmental Health Standards for the Management of Hazardous Waste, Title 23 Waters, and Title 27 Environmental Protection.

Worker and public health and safety are key issues when addressing hazardous materials that may affect human health and the environment. Proper management and disposal of hazardous material is vital if it is found, disturbed, or generated during project construction.

3.2.3.2 Affected Environment

The following section is based on the Assessment of Hazardous Materials Potentially Affecting the El Camino Real, State Route 82, Renewal Project, EA 04-0K810/0K81U Memorandum prepared for the project (Caltrans 2021). The memorandum was prepared to identify containments of concern that could be disturbed during project construction. The assessment included a review of reports and histories covering the regulated sites in the project area.

Hazardous Materials Sites

A search of the Department of Toxic Substances Control’s EnviroStor and the State Water Quality Control Board’s GeoTracker databases identified 10 hazardous materials release sites along the project corridor. These 10 sites are shown in Table 3.2.3-1. Five of the release sites’ cases are closed. These five sites have had their regulatory oversight mitigation work concluded for at least 10 years and have been either completely redeveloped or are completely vacant, with all station structures and appurtenances removed. The remaining five hazardous materials release sites have been identified as having the potential for project construction work (i.e., subsurface work) to be affected by groundwater contaminant plumes.

Table 3.2.3-1. Hazardous Materials Release Sites along the Project Corridor

Site	Address	Cross Street	Site Status
ARCO gas station	402 El Camino Real	East Poplar Street	Eligible for case closure
76 gas station	1480 Broadway	Broadway	Ongoing fuel remediation
Lux Cleaners	1560 Trousdale Drive	Trousdale Drive	Ongoing solvent remediation
76 gas station	1876 El Camino Real	Murchison Drive	Ongoing fuel remediation
76 gas station	5 El Camino Real	Millbrae Avenue	Ongoing fuel remediation
Chevron station	610 El Camino Real	E. & W. Bellevue Avenue	Closed
Shell station	1490 Burlingame Avenue	Burlingame Avenue	Closed
Chevron station	260 El Camino Real	Burlingame Avenue	Closed
Chevron station	1501 El Camino Real	Adeline Drive	Closed
Chevron station	1810 El Camino Real	Trousdale Drive	Closed

Source: Caltrans 2021

Depth-to-water measurements taken at various sites in the project area, such as those discussed above, show that the water table is usually about 10 feet deep, with a depth closer to 14 feet in the summer and fall dry seasons.

Aerially Deposited Lead (ADL)

Lead alkyl compounds were added to gasoline from 1920 up to the mid-1980s. As a result, shallow soils along highway corridors have the potential to be contaminated with aerially deposited lead (ADL) from historical vehicle emissions. During construction of the proposed project, excavation performed for retaining walls, traffic signals, and drainage systems would occur to depths greater than three feet, within soils having anticipated average lead

concentrations below the regulatory threshold. Typically, the deeper the excavation, the lower the estimated average lead concentration of the waste soil is likely to be due to the surface deposition and adsorption of ADL during the era of leaded fuel use. However, shallow soils encountered during project construction, such as for performing shallow excavations in currently unpaved areas for upgraded sidewalks, have the potential to be contaminated with ADL at average concentrations above the regulatory threshold of 80 parts per million.

3.2.3.3 Environmental Consequences

No Build Alternative

The No Build Alternative would not affect potential sources of hazardous materials in the project area.

Build Alternative

Identified hazardous materials release sites along the project corridor are shown in Table 3.2.3-1 above.

Handling and Storage of Hazardous Materials

Project construction and maintenance activities are expected to involve the routine transport, use, and disposal of hazardous materials (e.g., fuels, paints, and lubricants) that would not pose a threat to human health or the environment if properly managed. The transport, use, and disposal of hazardous materials during construction is regulated and enforced by federal and State agencies. In addition, spill prevention and control methods addressing hazardous materials, such as fuels for construction equipment, would be addressed in Caltrans Standard Specifications.

Workers who handle hazardous materials are required to adhere to OSHA and Cal/OSHA health and safety requirements. Hazardous materials must be transported in accordance with RCRA and USDOT regulations and disposed of in accordance with RCRA and the California Code of Regulations (CCR) at facilities that are permitted to accept the waste.

In accordance with the SWRCB, a SWPPP must be prepared and implemented during construction for coverage under the Construction General Permit. The SWPPP requires implementation of BMPs for hazardous materials storage and soil stockpiles, inspections, maintenance, training of employees, and containment of releases to prevent runoff into existing storm water collection systems or waterways.

Adherence to federal and State regulations during project construction and maintenance reduces the risk of exposure to hazardous materials and accidental hazardous materials releases. Compliance with existing regulations is mandatory; therefore, construction of the Build Alternative is not expected to create a hazard to construction workers, the public, or the environment through the routine transport, use, disposal, or accidental release of hazardous materials. As a result, the project would have no adverse effects related to the routine transport, use, disposal, or accidental release of hazardous materials during construction and maintenance activities and no mitigation is required.

Disturbance of Hazardous Materials

ADL from the historical use of leaded gasoline exists along roadways throughout California. Soils with elevated concentrations of lead as a result of ADL are likely present on the State

highway system right-of-way within the project limits of the proposed project. Soil determined to contain lead concentrations exceeding stipulated thresholds must be managed under the July 1, 2016, ADL Agreement between Caltrans and the California Department of Toxic Substances Control (DTSC). This ADL Agreement allows such soils to be safely reused within the project limits as long as all requirements of the ADL Agreement are met. Project construction could result in the potential disturbance of hazardous materials in soil and groundwater. Shallow soils in currently unpaved areas that would be excavated during construction could likely contain ADL at concentrations above DTSC-regulated levels. Additionally, project construction could encounter groundwater containment plumes originating from hazardous waste release sites close enough to reach the project footprint, as noted in Table 3.2.3-1 above. Minimal groundwater is anticipated to be encountered during project construction as traffic signal foundation depths would be 15 feet.

The disturbance of hazardous materials during project construction and maintenance activities, such as excavation, would not pose an adverse effect to human health and the environment if properly managed. As described in Section 2.1.1.3, implementation of Caltrans standards and compliance with applicable federal and State regulations would ensure potential hazardous materials in soil, groundwater, and building materials are investigated before construction. Site-specific control measures would be incorporated into the final project design to address and minimize any potential adverse effects to human health and the environment that could result from the disturbance of hazardous materials.

3.2.3.4 Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization, or mitigation is required.

3.2.4 Energy

3.2.4.1 Regulatory Setting

The National Environmental Policy Act (NEPA) (42 United States Code [USC] Part 4332) requires the identification of all potentially significant impacts to the environment, including energy impacts.

The California Environmental Quality Act (CEQA) Guidelines section 15126.2(b) and CEQA Appendix F, Energy Conservation, require an analysis of a project's energy use to determine if the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources.

3.2.4.2 Affected Environment

This section describes existing conditions in the project limits and the State of California that affect energy usage.

Project Limits

The project is within a relatively urbanized environment, and the surrounding land uses include mixed residential and commercial development with many driveways. El Camino Real is a signalized major thoroughfare that connects several downtown areas and communities in San Mateo County. Within the project limits, El Camino Real has various roadside advisory, warning, and regulatory signs and features light poles and luminaries. There are left turn lanes to facilitate the efficient movement of traffic at the intersections of East Poplar Avenue, Trousdale Drive, Murchison Drive, and Millbrae Avenue. As noted in Section 1.3.2.1, the roadway features cracking, rutting, and a high roughness indicator. Twenty-two thousand vehicles a day travel on El Camino Real within the project limits, including 640 trucks (approximately 3% of total vehicles) (Caltrans 2016b).

California

In California, the transportation sector consumes the most energy (nearly 40 percent in 2017; U.S. Energy Information Administration 2019a). The high consumption of transportation fuels in California is attributed to the state's abundance of airports, military bases, public transportation, and automobiles. In addition, major metropolitan areas, such as San Francisco and Los Angeles, experience extremely long commute travel times and delay because of high traffic congestion and long distances of travel between homes and jobs.

Fossil fuels are the predominant source of energy consumed by the transportation sector. Approximately 56 percent of fossil fuels consumed by the California transportation sector is gasoline (U.S. Energy Information Administration 2019b). Alternatives to fossil fuels have helped decrease the dependence on gasoline and other fossil fuels. The following alternatives to fossil fuels are currently used in California (U.S. Energy Information Administration 2019c):

- Compressed natural gas
- Electricity
- Ethanol, 85 percent

- Hydrogen
- Liquefied natural gas
- Liquefied petroleum gas

3.2.4.3 Environmental Consequences

Energy use under the No Build Alternative and the Build Alternative (either with or without inclusion of the design option) was evaluated to determine if the project would result in a net increase in energy use and/or decrease in energy efficiency. The Caltrans Standard Environmental Reference, Volume 1, Chapter 13, Energy (Caltrans 2015) was used as guidance to analyze the direct and indirect energy consumption attributed to the project. Direct energy refers to the fuel consumed by vehicles that would use the project facility as well as the one-time energy expenditure involved in constructing a project. Indirect energy refers to all the remaining energy consumed to run a transportation system including maintenance and operation energy.

Direct Energy

To assess gasoline and diesel consumed by construction equipment and vehicles, the Road Construction Emissions Model (RCEM), version 9.0.0, provided by the Sacramento Metropolitan Air Quality Management District, was used to quantify carbon dioxide emissions and vehicle miles traveled by construction workers. The U.S. Environmental Protection Agency greenhouse gas equivalencies formulas were used to convert the emissions and vehicle miles traveled into fuel volumes (Caltrans 2021d). Table 3.2.4-1 shows the direct energy consumption that would result from construction of the Build Alternative. The No Build Alternative, since it involves no construction, would result in no direct energy consumption.

Table 3.2.4-1. Direct energy consumption from construction activities

Build Alternative	Diesel Consumption (in gallons)	Gasoline Consumption (in gallons)
Annual	39,282	1,348
Total for 3 years	117,847	4,043

Source: Caltrans 2021d

Energy use during construction is dependent on the equipment being used for each activity at any given time, but the average annual fuel consumption is shown in Table 3.2.4-1. The total consumption for the 3-year project span would be 117,847 gallons of diesel and 4,043 gallons of gasoline.

Because construction activities are short-term, the increase of consumption within the project limits would also be short-term. As noted in Section 2.1.1.3, the following measures will be included in the construction contract to minimize energy consumption from construction activities and reduce the total direct energy requirement:

- Regular vehicle and equipment maintenance.
- Recycle non-hazardous waste and excess materials, where possible, to reduce offsite disposal.

The Build Alternative would rehabilitate the roadway and would not propose changes to the operation of the roadway that could result in either increased capacity or decreased congestion. As such, the Build Alternative would not result in changes to traffic volumes, vehicle mix, or any other factor that would cause an increase in energy consumption (i.e., vehicle fuel) of the project from that of the No Build Alternative. The project would not increase the capacity of the roadway, therefore, total direct energy use would be the same for the Build Alternative and the No Build Alternative.

Indirect Energy

The Build Alternative includes several features to reduce indirect energy consumption when compared with the No Build Alternative. These features include:

- Upgraded sidewalks (widths, profiles, and cross slopes)
- Upgraded curbs (ramp slope, landing, and detectable warning surface)
- Accessible pedestrian signals (APS) and countdown pedestrian signal (CPS)
- High-visibility crosswalk markings
- Rehabilitated roadway section
- Upgraded drainage infrastructure

These improvements would reduce indirect energy consumption by decreasing fuel use in two ways: the Build Alternative would include long-life pavement which requires less frequent maintenance and would improve pedestrian access in the project limits, potentially encouraging pedestrian use over vehicle use.

Consistency with Energy Conservation Plans

The *California Energy Action Plan* was approved in 2003 by the Energy Resources Conservation Development Commission (also known as the California Energy Commission [CEC]), the California Public Utilities Commission (CPUC), and the Consumer Power and Conservation Financing Authority (which is now defunct). The goal of the Plan was to ensure that adequate, reliable, and reasonably-priced electrical power and natural gas supplies are achieved and provided through policies, strategies, and actions that are cost-effective and environmentally sound. A second Energy Action Plan was adopted in 2005, and an update was issued in 2008. In 2019, CEC issued the *California Energy Efficiency Action Plan*, which focuses on reducing energy use in sectors other than transportation; separately, the CPUC has been consolidating efforts to implement directives from the Legislature and the Governor's Office to accelerate investment in transportation electrification (CEC 2019a).

CEC also prepares a biennial integrated energy policy report that assesses major energy trends and issues and provides policy recommendations to conserve resources, and issues updates and associated policy recommendations in alternate years. The 2019 *Integrated Energy Policy Report* assesses the state of “clean transportation” in California, including the target of deploying 5 million zero-emission vehicles (ZEVs), including transit and school buses and freight vehicles, statewide by 2030 in accordance with Executive Order B-48-18 (CEC 2019b).

The project is included in the current RTP for the San Francisco Bay Area (MTC and ABAG 2017, amended 2020; reference number 17-10-0025). The RTP integrates a Sustainable Communities Strategy on land use, housing, and transportation to meet targets in energy efficiency and reduction in fossil fuel consumption, as required by SB 375. In addition, the RTP provides for funding carpooling incentives, including private sector ride-matching applications, that target use HOV/express lane use.

Direct energy consumption for the Build Alternative would include short term construction activity. However, with the inclusion of project features (such as longer pavement lives, improved traffic management plans, and changes in materials), energy consumption during construction would be offset to some degree by longer intervals between maintenance and rehabilitation activities. Also, the Build Alternative would potentially encourage pedestrian mobility and further decrease the energy used on maintenance of the roadway. Therefore, the Build Alternative would not conflict with a state or local plan for renewable energy or energy efficiency.

Energy use during the construction of the project would be temporary and a necessary commitment or expenditure that is associated with any infrastructure improvement project. The construction contractor would have a financial disincentive to waste fuel used by the construction equipment (i.e., excess fuel usage reduces profits). Therefore, it is generally assumed that fuel used during construction would be conserved to the maximum extent feasible. Furthermore, regulations enforced by CARB (Title 13, Section 2485 of California Code of Regulations) limit the idling time of diesel construction equipment to five minutes. Therefore, it is anticipated that energy consumption during the construction period would be minimized to the maximum extent practicable. Therefore, the construction of the project would not conflict with a state or local plan for renewable energy or energy efficiency.

3.2.4.4 Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization, or mitigation is required.

3.3 Biological Environment

3.3.1 Natural Communities

This section of the document discusses natural communities of concern. The focus of this section is on biological communities, not individual plant or animal species. This section also includes information on wildlife corridors, fish passage, and habitat fragmentation. Wildlife corridors are areas of habitat used by wildlife for seasonal or daily migration. Habitat fragmentation involves the potential for dividing sensitive habitat and thereby lessening its biological value. Information herein is summarized from the *Natural Environment Study-Minimal Impacts* (Caltrans 2021c) for the proposed project, which was completed in October 2020 and revised in May 2021.

3.3.1.1 Affected Environment

A biological study area (BSA) was established to evaluate the effects of the project on natural communities and other biological resources. The BSA is 85 acres in size and covers the footprint where work would be performed as well as a 100-foot buffer around the work area. The roadway is bordered by businesses, sidewalks, residential buildings, and mature trees and contains traffic lights and crosswalks throughout.

As noted in Section 3.2.1, there are several water features that run through or near the BSA that are described as intermittent streams (USFWS 2020a). Essential Fish Habitat for Pacific salmonids also exists over the entire San Francisco Bay including the BSA.

Riparian corridors exist at some of the creek crossings that run through the BSA including Cherry Canyon Creek, Sanchez Creek, and Mills Creek. These riparian or semi-riparian sites may act as foraging areas for insectivorous birds or pathways for small mammals and turtles. These creeks do not typically contain water for more than a few weeks each year in these locations and the water table is typically well below ground surface (USFWS 2020a).

There are no Habitat Conservation Plans (HCP) or Natural Community Conservation Plans in the BSA with jurisdiction over this project type. The PG&E Bay Area Operations & Maintenance HCP overlaps with the project limits, but only consists of PG&E-owned facilities for operation and maintenance activities and does not contain policies or goals related to the project (USFWS 2017). The other nearest HCP is the San Bruno Mountain HCP, which is over 4.5 miles north of the project limits (San Mateo County 1982). The BSA also contains no natural landscape areas according to the California Essential Habitat Connectivity Map (Spencer 2010).

Urban trees that have been planted by local municipalities are not considered natural habitat but they do serve as a resource (provide habitat) that is often used by native wildlife species such as birds, small mammals and insects. Large amounts of city trees NES(MI) 24 May 2021, or patches of open space within cities are often referred to as “urban forests” and can contribute to a rich biodiversity with input from city planners and urban foresters (Alvey 2006). There is an abundance of city trees and shrubs in a 1-mile area (700 acres) surrounding the project limits. Tree removal will occur only along the sidewalks of the project limits (about 38 acres).

Wildlife that may use the BSA include American crow (*Corvus linnaeus*), honey bee (*Apis mellifera*), herons and egrets (Ardeidae family), hummingbirds (Trochilidae family), red-eared slider (*Trachemys scripta elegans*), western pond turtle (*Actinemys marmorata*), gulls (Laridae

family), red-tailed hawk (*Buteo jamaicensis*), turkey vulture (*Cathartes aura*), Cooper's hawk (*Accipiter cooperii*), Eastern gray squirrel (*Sciurus carolinensis*), house finch (*Haemorrhous mexicanus*), black phoebe (*Sayornis nigricans*), and California scrub-jay (*Aphelocoma californica*).

3.3.1.2 Environmental Consequences

No Build Alternative

The No Build Alternative would not affect vegetation, migratory corridors, or fish passage.

Build Alternative

Project construction would be limited to the existing roadway, sidewalks, driveways, and other previously disturbed surfaces.

The project would result in the removal of 300 to 350 trees out of approximately 700 trees in the project limits. About 250 of these trees contribute to the Howard-Ralston Eucalyptus Tree Rows—less than half of them are original (150+ years old) eucalyptus and the rest are younger trees of various species and ages. Tree removal would occur only along the sidewalks within the project limits (about 38 acres). A tree removal schedule will be decided in later phases with coordination among design engineers, landscape architects, and the SHPO. Trees will be replaced at a 1:1 ratio with various species to promote biodiversity.

As further described in Section 3.3.2.3, construction activities such as tree removal and other project-related ground disturbances or equipment operation are subject to the Migratory Bird Treaty Act. Therefore, the contractor would be required to comply with the Migratory Bird Treaty Act, which involves the implementation of BMPs to substantially reduce conflict with nesting and foraging birds.

Tree removal during construction is not anticipated to adversely affect the urban forest in the project limits or its value to native species over the long-term. There will be an abundance of mature trees in the project area post-construction. Caltrans will replant trees as part of the project. No work would occur within waterways or riparian corridors. Overall, the project would have no effect on designated natural communities.

3.3.1.3 Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization, or mitigation is required.

3.3.2 Animal Species

3.3.2.1 Regulatory Setting

Many state and federal laws regulate impacts to wildlife. The USFWS, NMFS, and CDFW are responsible for implementing these laws. This section discusses potential impacts and permit requirements associated with animals not listed or proposed for listing under the federal or state Endangered Species Acts. Species listed or proposed for listing as threatened or endangered are discussed at the beginning of Chapter 3. All other special-status animal species are discussed here, including CDFW fully protected species and species of special concern, and USFWS or NMFS candidate species.

Federal laws and regulations relevant to wildlife include the following:

- NEPA
- Migratory Bird Treaty Act
- Fish and Wildlife Coordination Act

State laws and regulations relevant to wildlife include the following:

- CEQA
- Sections 1600 – 1603 of the California Fish and Game Code
- Sections 4150 and 4152 of the California Fish and Game Code

3.3.2.2 Affected Environment

The identification of special-status animal species with potential to occur in the region was based on a search of the California Natural Diversity Database (CDFW 2020), California Native Plant Society Online Inventory of Rare and Endangered Plants (CNPS 2020), USFWS species list (Appendix C) (USFWS 2020b), NMFS species list (Appendix C) (NMFS), USFWS designated critical habitat mapper (USFWS 2020c), and the National Wetlands Inventory (USFWS 2020a). A list of special-status species with potential to occur in the region is included in Appendix C. A field review of the BSA was conducted in October 2020. Caltrans biologists determined this project would have no effect to federally listed species. This determination was made under Section 7 of the federal Endangered Species Act. Additionally, this project is not anticipated to adversely affect state-listed or other regulated species (Caltrans 2021c). Additionally, Caltrans does not anticipate effects to animals that are fully protected or species of special concern under CDFW.

Migratory Birds

All migratory birds in the BSA are protected by the Migratory Bird Treaty Act and Section 3513 of the California Fish and Game Code. Many species of migratory birds may inhabit the BSA at any given time and would typically use similar nesting locations. Migratory birds comprise many different bird species, including many common species. Potential nesting locations for migratory birds in the BSA include street trees, dense shrubs, and human-made structures. Migratory birds

nesting near the project limits would likely be tolerant of the disturbances and noise associated with the urban environment. Migratory birds could nest in the BSA during construction.

3.3.2.3 Environmental Consequences

No Build Alternative

The No Build Alternative would not affect animal species within the BSA.

Build Alternative

Migratory Birds

Under the Build Alternative (either with or without inclusion of the design option) Caltrans has identified the risk of impacting active nests during construction or disrupting foraging habitat during construction. Construction activities such as tree removal and other project-related ground disturbances or equipment operation are subject to the Migratory Bird Treaty Act. Therefore, the contractor would be required to comply with the Migratory Bird Treaty Act, which involves following BMPs to substantially reduce conflict with nesting and foraging birds as follows:

BIO-1 Construction activities (including vegetation removal) will be conducted between September 30 and January 31 or a qualified biologist will conduct a nesting migratory bird survey within 72 hours prior to construction.

If active nests of migratory birds are detected within 50 feet of construction activities for passerines or within 300 feet of construction activities for raptors, the biological monitor will establish an appropriate non-disturbance buffer to avoid direct effects of construction-related disturbance until work has been completed or birds have fledged.

Should construction activities be suspended for a period longer than 14 days, then a new pre-construction nesting migratory bird survey will be conducted within 14 days prior to resuming construction activities.

3.3.2.4 Avoidance and Minimization Measures

No avoidance, minimization, or mitigation is required.

3.3.3 Invasive Species

3.3.3.1 Regulatory Setting

On February 3, 1999, President William J. Clinton signed EO 13112 requiring federal agencies to combat the introduction or spread of invasive species in the United States. The order defines invasive species as “any species, including its seeds, eggs, spores, or other biological material capable of propagating that species, that is not native to that ecosystem whose introduction does or is likely to cause economic or environmental harm or harm to human health.” FHWA guidance issued August 10, 1999 directs the use of the State’s invasive species list, maintained by the California Invasive Species Council to define the invasive species that must be considered as part of the NEPA analysis for a project.

3.3.3.2 Affected Environment

The BSA supports a number of non-native species. Nearly all of the invasive species observed during the field visit were landscaped plants, some of which are on private property. Invasive species in the BSA include English ivy (*Hedera helix*), Cape ivy (*Delairea odorata*), blackwood acacia (*Acacia melanoxylon*), red gum eucalyptus (*Eucalyptus camaldulensis*), blue gum eucalyptus (*Eucalyptus globulus*), wild oat (*Avena fatua*), cotoneaster (*Cotoneaster sp.*), woolly cotoneaster (*Cotoneaster pannosus*), hawthorn (*Crataegus monogyna*), firethorn (*Pyracantha coccinea*), Himalayan blackberry (*Rubus armeniacus*), and Siberian elm (*Ulmus parvifolia*).

Red gum and blue gum eucalyptus and some elms within the project limits are considered invasive species and yet are also contributors to the Howard-Ralston Eucalyptus Tree Rows. These trees are a protected resource listed on the NRHP. These trees do not appear to be propagating into adjacent ecosystems, such as creeks within the BSA, or elsewhere within the project limits. This is likely due to the extensive nature of land development and armored creek banks within the BSA. California Invasive Plant Council (Cal-IPC) categorizes both blue gum and red gum eucalyptus as “limited—these species are invasive, but their ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Their reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited, but these species may be locally persistent and problematic” (Cal-IPC 2021). The Cal-IPC database does not contain any elm species.

3.3.3.3 Environmental Consequences

No Build Alternative

The No Build Alternative would not introduce invasive species into the BSA.

Build Alternative

Short-Term (Construction)

The Build Alternative (either with or without inclusion of the design option) would remove trees that are listed as both historic and generally categorized as invasive. In addition, all construction carries the potential to introduce new invasive species or provide an opportunity for them to flourish. However, project construction would require implementation of a SWPPP. The BMPs to be included in the SWPPP such as soil stabilization and sediment control (Section 2.1.1.2)

apply to all exposed soil areas, thereby substantially reducing the risk of invasive species establishing or spreading during construction activities.

Long-Term (Operations)

Following project construction, no areas of exposed soil would be present within the project limits. This would reduce the risk of long-term small invasive plant propagation. As noted in the *Replanting Plan* in Appendix F, invasive species will not be used for replanting. The Build Alternative, with and without the design option, would comply with Executive Order 13112 to reduce the spread of invasive species. Therefore, in the long term, the Build Alternative would not substantially contribute to the spread of invasive species.

3.3.3.4 Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization, or mitigation is required.

3.4 Construction Impacts (Noise)

Construction impacts have been described throughout Chapter 2 and in Sections 3.1 through 3.3. However, since the project is not a Type I project per 23 CFR 772, a traffic noise analysis pursuant to that regulation is not required and is not included in this EIR/EIS. However, the Build Alternative would require both daytime and nighttime construction in close proximity to hundreds of receptors. Therefore, this section presents an evaluation of the noise that could be generated by construction of the Build Alternative. The following discussion is based on the *Construction Noise Analysis Memorandum* (Caltrans 2021e).

The No Build Alternative would not result in a change in existing noise levels.

The Build Alternative would require sidewalk replacement and curb ramp upgrades, pedestrian and signalized infrastructure upgrades, pavement demolition, pavement reconstruction, drainage upgrades, and tree removal, clearing, and grubbing. These activities were modelled at 14 locations within the project limits as well as four typical locations at 50, 100, 200, and 500 feet from construction activities.

The Roadway Construction Noise Model was used to estimate noise levels during construction. This model is FHWA's national model for the prediction of construction noise. The model includes representative sound levels for the most common types of construction equipment and the estimated percentage of time that the equipment would be operating at full power. Vehicles and equipment likely to be used during each construction activity were input into the model. The model estimates the maximum hourly noise levels (L_{max}) and the average hourly noise levels (L_{eq}) at the modelled locations within the project limits. The locations considered in this noise analysis and the estimates of noise resulting from construction of the Build Alternative are shown in Table 3.4-1.

L_{max} is the highest instantaneous noise level modelled for each specific activity. L_{eq} is the average noise level for the activity. In some instances, the maximum noise level estimated is slightly lower than the average noise level. The average noise level accounts for noise fluctuations from moment to moment by averaging the louder and quieter moments together and it gives more weight to the louder moments.

The model assumes noise decreases as distance from the noise source increases but it does not take into account noise being absorbed or shielded by trees, structures, or other physical impediments within the project limits. Therefore, the predicted noise levels shown in Table 3.4-1 are conservative. Predicted noise levels are shown in A-weighted decibels (dBA) or relative loudness as perceived by the human ear.

According to the 2018 Caltrans Standard Specifications Section 14-8.02, construction activities are not to exceed 86 dBA L_{max} at a distance of 50 feet from 9 p.m. to 6 a.m. In addition, California Streets and Highway Code Section 216 requires that average hourly construction noise (as measured by L_{eq}) heard internally at school locations not exceed 52 dBA.

All construction activities modelled would exceed these noise limits for at least one location within the project limits.

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Table 3.4-1: Build Alternative Construction Noise

Address	Type	Receptor Distance (feet)	Sidewalk Replacement/ Curb Ramp Upgrade L _{max}	Sidewalk Replacement/ Curb Ramp Upgrade L _{eq}	Pedestrian and Signalized Infrastructure Upgrade L _{max}	Pedestrian and Signalized Infrastructure Upgrade L _{eq}	Pavement Demolition L _{max}	Pavement Demolition L _{eq}	Pavement Reconstruction L _{max}	Pavement Reconstruction L _{eq}	Drainage Upgrades L _{max}	Drainage Upgrades L _{eq}	Tree Removal, Clearing, and Grubbing L _{max}	Tree Removal, Clearing, and Grubbing L _{eq}	Utility Relocation L _{max} (Design Option Only)	Utility Relocation L _{eq} (Design Option Only)
Hypothetical location at 50 feet	-	50	89.6	87.1	84.4	82.1	89.6	86.8	85.0	85.0	83.2	81.6	83.7	82.7	84.4	81.9
Hypothetical location at 100 feet	-	100	83.6	81.1	78.3	76.1	83.6	80.7	79.0	79.0	77.2	75.6	77.5	76.7	78.3	75.9
Hypothetical location at 200 feet	-	200	77.5	75.1	72.3	70.0	77.5	74.7	73.0	73.0	71.2	69.5	71.7	70.7	72.3	69.9
Hypothetical location at 500 feet	-	500	69.6	67.1	64.4	62.1	69.6	66.8	65.0	65.0	63.2	61.6	63.7	62.7	64.4	61.9
1648 Albemarle Way Burlingame	Residential	38	92.0	89.5	86.7	84.5	92.0	89.9	87.4	87.4	85.6	84.0	86.1	85.1	86.7	84.3
1605 Westmoor Road Burlingame	Residential	31	93.7	91.3	88.5	86.2	93.7	90.9	89.2	89.2	87.4	85.7	87.9	86.9	88.5	86.1
1150 Oxford Road Burlingame	Residential	24	96.0	93.5	90.7	88.5	96.0	93.1	91.4	91.4	89.6	88.0	90.1	89.1	90.7	88.3
Burlpres, 1500 Easton Drive Burlingame	Place of Worship	124	81.7	79.2	76.5	74.2	81.7	78.9	77.1	77.1	75.3	73.7	75.8	74.8	76.5	74.1
1308 El Camino Real Burlingame	Residential	35	92.7	90.2	87.5	85.2	92.7	88.9	88.1	88.1	86.3	84.7	86.8	85.8	87.5	85.0
1013 El Camino Real Burlingame	Residential	66	87.2	84.7	81.9	79.7	87.2	84.3	82.6	82.6	80.8	79.2	81.3	80.3	81.9	79.5
1442 Edgehill Drive Burlingame	Residential	28	94.6	90.6	89.4	87.1	94.6	91.8	90.0	90.1	88.3	86.6	88.8	87.8	89.4	87.0
McKinley Elementary 701 Paloma Avenue Burlingame (Exterior)	School	40	91.5	87.5	86.3	84.0	91.5	88.7	86.9	87.0	85.2	83.5	85.7	84.7	86.3	83.9
McKinley Elementary 701 Paloma Avenue Burlingame (Interior)	School	40	71.5	89.1	66.3	84.0	71.5	88.7	66.9	87.0	65.2	83.5	65.7	84.7	66.3	83.9
1615 Floribunda Avenue Hillsborough	Residential	120	82.0	79.5	76.8	74.5	82.0	79.1	77.4	77.4	75.6	74.0	76.1	75.1	76.8	74.3
10 Kammerer Court Hillsborough	Residential	46	90.3	87.9	85.1	82.8	90.3	87.5	85.7	85.7	84.0	82.3	84.4	83.5	85.1	82.7
1501 Cypress Avenue, Burlingame	Residential	22	96.7	94.3	91.5	89.2	96.7	93.9	92.1	92.1	90.4	88.7	90.9	89.9	91.5	89.1
820 North El Camino Real San Mateo	Residential	30	94.0	91.6	88.8	86.5	94.0	91.2	89.4	89.5	87.7	86.0	88.2	87.2	88.8	86.4

Address	Type	Receptor Distance (feet)	Sidewalk Replacement/ Curb Ramp Upgrade L _{max}	Sidewalk Replacement/ Curb Ramp Upgrade L _{eq}	Pedestrian and Signalized Infrastructure Upgrade L _{max}	Pedestrian and Signalized Infrastructure Upgrade L _{eq}	Pavement Demolition L _{max}	Pavement Demolition L _{eq}	Pavement Reconstruction L _{max}	Pavement Reconstruction L _{eq}	Drainage Upgrades L _{max}	Drainage Upgrades L _{eq}	Tree Removal, Clearing, and Grubbing L _{max}	Tree Removal, Clearing, and Grubbing L _{eq}	Utility Relocation L _{max} (Design Option Only)	Utility Relocation L _{eq} (Design Option Only)
450 North El Camino Real San Mateo, CA 94401	Residential	31	93.7	91.3	88.5	86.2	93.7	90.9	89.2	89.2	87.4	85.7	87.9	86.9	88.5	86.1
West Poplar Avenue San Mateo	Residential	37	92.2	89.8	87.0	84.7	92.2	89.4	87.6	87.6	85.8	84.2	86.3	85.4	87.0	84.6

Note: **Bolded** numbers indicate an exceedance of the Caltrans standard noise limit.

3.4.1.1 Avoidance, Minimization, and/or Mitigation Measures

Noise measures NOI-1 and NOI-2 will be implemented to avoid, minimize, and mitigate impacts from construction noise.

NOI-1. A temporary noise barrier or other control measure will be put in place in front of McKinley Elementary to attenuate noise to less than 52 dBA whenever work is planned within 500 feet of the school during regular school hours. Noise levels will be verified through noise monitoring during construction.

NOI-2. The project plans will include a specification for the contractor to create and implement a Noise Control and Monitoring Plan. The plan will require the contractor to implement measures to limit noise levels to comply with 2018 Caltrans Standard Specifications Section 14-8.02 and California Streets and Highway Code Section 216. Noise levels will be verified through noise monitoring during construction.

3.5 Relationship Between Local Short-Term Uses of the Human Environment and the Maintenance and Enhancement of Long-Term Productivity

Project implementation would result in attainment of short-term and long-term transportation goals at the expense of some long-term aesthetic and cultural impacts.

No Build Alternative

The No Build Alternative would offer none of the gains or have any of the losses listed for the Build Alternative. It would also not meet the purpose and need to correct roadway deficiencies and improve safety.

Build Alternative

Short-term losses would include: construction impacts such as noise and dust; motorized and non-motorized traffic delays; potential for temporary short-term interruption of utilities during construction activities; and short-term disruption of access to pedestrian facilities and private property (e.g., driveway reconstruction) during construction.

Short-term benefits would include: increased jobs and revenue generated during construction.

Long-term losses would include: loss of visual and cultural resources from the removal of trees within the project limits, some of which may be eventually restored after replacement trees mature; use of construction materials and energy; removal of personal property and cultural resources from within state right-of-way (e.g., fence).

Long-term gains include: improved traffic safety and road quality, improved drainage efficiency to reduce localized flooding, enhanced pedestrian infrastructure and user visibility and safety, ADA access, and a long-term management plan for the trees within the project limits.

3.6 Irreversible and Irretrievable Commitment of Resources

The proposed action involves a commitment of a range of natural, physical, human, and fiscal resources.

Considerable amounts of fossil fuels, labor, and highway construction materials such as cement, aggregate, and bituminous material would be used. Additionally, large amounts of labor and natural resources are used in the making of construction materials. These materials are generally not retrievable. However, they are not in short supply and their use would not have an adverse effect upon continued availability of these resources. Any construction would also require a substantial one-time use of both state and federal funds, which are not retrievable; project-related savings in energy, time, and an improvement in roadway, drainage, and pedestrian infrastructure would offset this use. In addition to the costs of construction and right-of-way would be costs for roadway maintenance, including pavement, roadside, signs and markers, electrical and storm maintenance. The removal of trees with cultural value is an irreversible and irretrievable commitment of resources.

The commitment of these resources is based on the concept that residents in the immediate area, region, and state would benefit from the improved quality of the transportation system. These benefits would consist of correcting roadway, drainage, and pedestrian infrastructure deficiencies, which are expected to outweigh the commitment of these resources.

3.7 Cumulative Impacts

3.7.1 Regulatory Setting

Cumulative impacts are those that result from past, present, and reasonably foreseeable future actions, combined with the potential impacts of the proposed project. A cumulative effect assessment looks at the collective impacts posed by individual land use plans and projects. Cumulative impacts can result from individually minor but collectively substantial impacts taking place over a period of time.

Cumulative impacts to resources in the project limits may result from residential, commercial, industrial, and highway development, as well as from agricultural development and the conversion to more intensive agricultural cultivation. These land use activities can degrade habitat and species diversity through consequences such as displacement and fragmentation of habitats and populations, alteration of hydrology, contamination, erosion, sedimentation, disruption of migration corridors, changes in water quality, and introduction or promotion of predators. They can also contribute to potential community impacts identified for the project, such as changes in community character, traffic patterns, housing availability, and employment.

The California Environmental Quality Act (CEQA) Guidelines Section 15130 describes when a cumulative impact analysis is necessary and what elements are necessary for an adequate discussion of cumulative impacts. The definition of cumulative impacts under CEQA can be found in Section 15355 of the CEQA Guidelines. A definition of cumulative impacts under the National Environmental Policy Act (NEPA) can be found in 40 Code of Federal Regulations (CFR) Section 1508.7.

3.7.2 Cumulative Impact Analysis

This cumulative impact analysis determines whether the project, in combination with projects that are planned, approved, or under construction, would result in a cumulative effect, and, if so, whether the project's contribution to the cumulative impact would be considerable. Projects considered in the cumulative impact analysis include land use developments, infrastructure, and other transportation improvements that would be located near the project. The projects included in the cumulative impact analysis are described in Table 3.7-1.

The cumulative impacts analysis follows the Caltrans 8-step process established in the Guidance for Preparers of Cumulative Impact Analysis: Approach and Guidance (Caltrans 2005) as follows:

- **Step 1:** Identify resources to consider in the cumulative impact analysis.
- **Step 2:** Define the Resource Study Area (RSA), or geographic boundary, for each cumulative impact analysis.
- **Step 3:** Describe the current health [and historical context] of each resource.
- **Step 4:** Identify any direct and/or indirect impacts the Build Alternative may contribute to a cumulative impact on the identified resources.
- **Step 5:** Identify a set of active projects to include in the cumulative impact analysis.

Table 3.7-1. Projects Considered in the Cumulative Impact Analysis

Project Title	Distance to Project	Lead Agency(s)	Description	Project Status
25 th Ave Grade Separation Project	2.5 miles south	Caltrain	Caltrain, in cooperation with the City of San Mateo, will raise the tracks and slightly lower the road (grade separation) at East 25th Avenue in the City of San Mateo. This will improve safety for both motorists and pedestrians, and it will reduce local traffic congestion in the City of San Mateo.	Construction: Fall 2017 to Fall 2021
Burlingame Broadway Grade Separation Project	0.3 miles east	Caltrain	Caltrain, in cooperation with the City of Burlingame, will separate the tracks from the road at Broadway in Burlingame. This will improve safety for motorists, pedestrians, bicyclists and Caltrain railroad operations, as well as reduce local traffic congestion in Burlingame. The project will also construct a new elevated Broadway Station with new amenities that eliminates the current hold-out rule in which only one train is allowed at the station at a time.	Environmental Clearance: Summer 2020 Construction: July 2023 to July 2026
Grade Crossing Improvement Projects in the City of San Mateo	0.6 miles southeast	Caltrain	Caltrain, in cooperation with city partners, will begin a project to improve the safety at 5 at-grade crossings (intersections where train tracks cross a street) in the City of San Mateo. These improvements will increase the safety for vehicles, pedestrians and cyclists. Grade crossing improvement sites include: 1st Avenue and S. Railroad Avenue, San Mateo 2nd Avenue and S. Railroad Avenue, San Mateo 3rd Avenue and S. Railroad Avenue, San Mateo	Construction is expected to start in early 2021 and be completed at all locations by the end of 2021.
Flood Zone Improvements	1.25 miles	City of San Mateo	In September 2020, construction started on the North Shoreview Flood Improvement Project. Some of the work includes improvements to the Coyote Point and Poplar Avenue Pump Stations and will prompt the temporary detour of the Bay Trail through the North Shoreview Neighborhood.	September 2020 to April 2023
High Speed Rail	0.2 miles northwest	CA High Speed Rail Authority	The California High Speed Rail Authority is working to develop a station area plan that will allow for the station to serve as a hub for high-speed rail. This joint effort will guide the design of the high-speed rail station and the area surrounding the station to help the city promote economic development, encourage station area development, and enhance connectivity to other modes of transportation.	Environmental clearance is scheduled to be completed in 2021
Hillsdale Pedestrian/Bicyclist Bridge	3 miles southeast	City of San Mateo	The Hillsdale Pedestrian/Bicyclist Bridge project envisions a Class I pedestrian and bicycle grade separated crossing over US 101 south of the Hillsdale interchange and a Class II facility on Hillsdale from Norfolk to the San Mateo/Foster City limits. The proposed bridge and Class II facility will	Preliminary Design

Project Title	Distance to Project	Lead Agency(s)	Description	Project Status
			allow for safe and unimpeded bicycle access apart from the high vehicular volumes at the Hillsdale Boulevard interchange while connecting the bicycle network from the Hillsdale Caltrain Station to Foster City and neighborhoods east of US 101.	
North San Mateo Drive "Complete Streets"	0.2 miles east	City of San Mateo	The City of San Mateo's Public Works Department is implementing "Complete Streets" improvements to North San Mateo Drive from Baldwin Avenue to Peninsula Avenue. San Mateo Drive is the County of San Mateo Bicycle route through the city. The project provides pedestrian and bicycle safety improvement that are consistent with the Pedestrian, Bicycle, and Sustainable Streets Master Plans. The Project consists of implementation of a road diet that converts the existing four-lane to two-lane with center turn lane and bicycle lanes from Poplar Avenue to Peninsula Avenue.	Construction began August 2020
El Camino Real Master Plan (SR92 to the Belmont city border)	1.8 miles south	City of San Mateo	The Master Plan is a framework for decision making for developers, designers, city officials, and concerned citizens interested in making the City of San Mateo a better place to live and work.	Approved in 2021
San Mateo Rail Corridor Transit-Oriented Development Plan	0.6 miles southeast	City of San Mateo	The intent of the San Mateo Rail Corridor Transit-Oriented Development Plan is to "allow, encourage, and provide guidance for the creation of world class transit-oriented development (TOD) within a half-mile radius of the Hillsdale and Hayward Park Caltrain station areas, while maintaining and improving the quality of life for those who already live and work in the area." As defined by the plan, "TOD refers to the concept of creating pedestrian friendly neighborhoods and districts in close and convenient proximity to transit stations, with the idea that a desirable living environment is being created, which is served by transit."	Adopted in 2005
937-939 N. Idaho Street	1 mile northeast	City of San Mateo	This project includes a site plan and architectural review for the demolition of an existing attached carport for the construction of an attached 429 square-foot garage serving two garage spaces for an existing duplex. Vesting tentative parcel map for the conversion of an existing duplex from single entity ownership to condominiums. The project does not propose expansion of the existing dwelling units or the addition of dwelling units.	Approved application
526/528 N. Claremont Street	0.5 mile northeast	City of San Mateo	This project includes a tentative parcel map for the conversion of an existing duplex from single entity ownership to condominiums. The project does not propose expansion of the existing dwelling units or the addition of dwelling units.	Approved application

Project Title	Distance to Project	Lead Agency(s)	Description	Project Status
210 S Fremont Street	0.5 miles northeast	City of San Mateo	Planning application for a site plan and architectural review, site development planning application, and subdivision map. Development of a four-story, 15-unit residential condominium building with below grade parking located at the southeast corner of 2nd Avenue and Fremont Streets.	Approved application
180 East 3rd Avenue	0.5 miles south	City of San Mateo	Site plan and architectural review to demolish the existing building (Aaron Brothers and office space at 300 S. Ellsworth Avenue) and construct a 17,187 square-foot three-story mixed-use building with one basement level. The proposed uses include 3,380 square feet of retail on the ground floor, and a total of 19,608 square feet of office in the basement, second, and third floors. A private rooftop terrace is also proposed. The applicant does not propose to provide parking on-site and has requested to pay Central Parking and Improvement District parking in-lieu fees.	Approved application
Essex at Central Park	0.6 miles south	City of San Mateo	A planning application has been submitted for the development of a five-story retail and residential housing located at the southern side of the block bordered by San Mateo Drive and 4th Avenue to the north across from Central Park's baseball diamond and tennis courts. The project will utilize the existing surface parking lot to develop 80 new residences, which range from one to three-bedroom apartments over a garage and 7,000 square feet of retail. The project will provide six Below-Market Rate housing units for Very-Low income households. All dwellings will be for rent.	Approved application
401 East Millbrae Avenue	0.5 miles south	City of Millbrae	The project would require modification to an approved specific development plan, design review, amendment to the MMC Chapter 10.10 Sign Regulations, Master Sign Program and Parking Variance to allow less than the required parking for the construction of a new hotel ("Moxy Hotel") at the Weston and Aloft Hotel site.	Application review complete
480 El Camino Real	0.5 miles south	City of Millbrae	The project would require design review, conditional use permit, and lot merger/subdivision to allow the demolition of a paved, surface parking lot and construction of a 4-story, 9 residential unit, and two commercial space, condominium building on a 5,807 square foot site, located in a Commercial Zoning District. The Planning Commission has recommended approval to the City Council, which takes final action on subdivisions.	Application review Complete
1 and 45 Adrian Court	0.5 miles east	Burlingame	The project consists of two parcels that currently include two commercial buildings, surface parking, and landscaping. The project entails the demolition of these features and the merging of the two parcels to create a 2.83-acre site for a seven-story, 265-unit mixed use development.	Approved project

Project Title	Distance to Project	Lead Agency(s)	Description	Project Status
			Approximately 14.3 percent of the residential units (38 units) would be designated for low income households. The project would entail 3,701 square feet of commercial/office space on the ground floor and a publicly accessible private park. Parking would be provided in an at-grade garage, containing two levels of parking for a total of 314 parking spaces.	
1499 Bayshore Highway	0.8 miles east	Burlingame	<p>The project would include 271,565 SF of building area and 144,518 SF of above-ground structured parking. Hotel amenities would include 6,200 SF of hotel bar/café/buffet space, 3,200 SF of conference/meeting space, a 1,900 SF pool bar and grill, a 1,700 SF rooftop bar/lounge, and an 1,800 SF fitness center. A 2,900 SF free-standing "signature" restaurant would adjoin the hotel at the street front. The building would have an overall height of 136 feet.</p> <p>The proposed project would have a total of 289 on-site parking spaces. Parking would be provided in a four-story structure integrated into the rear of the building.</p>	Approved project
601 California Drive	0.3 miles east	Burlingame	<p>The City of Burlingame has approved an application for construction of a new five-story, 25-unit live/work development at the corner of California Drive and Floribunda Avenue within the Downtown Specific Plan planning area.</p> <p>The proposed building includes 25 live/work units, with seven units located on each of the second, third, and fourth floors, and five units located on the fifth floor. The ground floor will consist of an entrance lobby and an at-grade parking garage for 25 vehicles. There is only one point of vehicular ingress and egress from the garage, which is provided off Floribunda Avenue.</p>	Approved project
619-625 California Drive	0.3 miles east	Burlingame	The City of Burlingame has approved an application for construction of a new four-story, 26-unit live/work development at the corner of California Drive and Oak Grove Avenue within the Downtown Specific Plan planning area.	Approved project
1214 Donnelly Avenue	0.3 miles east	Burlingame	The City of Burlingame has approved an application for Amendment to the Zoning Code and Downtown Specific Plan, Mitigated Negative Declaration, Design Review, Conditional Use Permit for building height and Lot Combination for construction of a new 14-unit mixed use commercial/residential building at 1214 Donnelly Avenue.	Approved project

Project Title	Distance to Project	Lead Agency(s)	Description	Project Status
			The proposed project site encompasses three parcels with addresses of 1214, 1218, and 1220 Donnelly Avenue. The applicant proposes to re-purpose the site with a new approximately 35,075 gross-square-foot mixed use building consisting of retail uses on the ground floor (4,704 square feet) and 14 residential units on the second and third floors.	
1128-1132 Douglas Avenue	0.3 miles east	Burlingame	<p>An application has been approved for design review, conditional use permit for building height, front setback landscape variance, parking variance for driveway width, and tentative parcel map for lot combination related to construction of a new, five-story 27-unit residential apartment building with at-grade and below-grade parking at 1128-1132 Douglas Avenue. The project includes three studio, fourteen 1-bedroom, nine 2-bedroom, and one 3-bedroom apartment units.</p> <p>The project site is currently developed with six residential units within three structures. All of the existing structures will be removed from the property as part of the project. The existing single-family residence at 1132 Douglas Avenue has been identified as a potential historic resource and as part of the development project, the front portion of the house is to be relocated to another site located at 524 Oak Grove Avenue, where it will be refurbished and enlarged as a single-family residence.</p>	Approved project
1457 El Camino Real	0 miles	Burlingame	The City of Burlingame has approved an application for construction of a new four-story, 9-unit residential condominium at 1457 El Camino Real.	Approved project
1766 El Camino Real	0 miles	Burlingame	The City of Burlingame has approved an application for Amendment to the Zoning Code (Off-Street Parking Regulations) to reduce the office parking ratio for properties located in the North Burlingame Mixed Use Zone; Mitigated Negative Declaration pursuant to CEQA, Design Review, and Conditional Use Permit for mechanical parking stackers for a new seven-story, mixed-use development with retail, office and 60 residential units with below grade parking at 1766 El Camino Real.	Approved project
1870 - 1876 El Camino Real	0 miles	Burlingame	<p>The City of Burlingame has approved an application for Environmental Review, Design Review, and Density Bonus for a new 7-story, 169-unit apartment development at 1870 - 1876 El Camino Real, within the North Burlingame Mixed Use area.</p> <p>The project site is composed of two parcels totaling 1.14 acres at the corner of El Camino Real and Murchison Drive. The site is currently occupied by a</p>	Approved project

Project Title	Distance to Project	Lead Agency(s)	Description	Project Status
			gasoline station and a two-story office building; the interior parcel with the office is a through lot to California Drive.	
556 El Camino Real	0 miles	Burlingame	An application has been approved for environmental review, Condominium Permit, Design Review, and Conditional Use Permit for Building Height for construction of a new five-story, 21-unit residential condominium building with below-grade parking at 556 El Camino Real. The proposed project includes three 1-bedroom units, twelve 2-bedroom units and six 3-bedroom units. The existing apartment complex would be demolished to build the proposed condominium building.	Approved project
1433 Floribunda Avenue	0.1 miles east	Burlingame	An application for Design Review, Condominium Permit, and Conditional Use Permit for building height has been approved for construction of a new four-story, 8-unit residential condominium building with at-grade parking at 1433 Floribunda Avenue, zoned R-3. The proposed project includes eight 2-bedroom units. This proposed project replaces the 10-unit condominium previously approved in May of 2015.	Approved project
21 Park Road	0 miles	Burlingame	An application has been approved for Design Review and Condominium Permit for a new 3-story, 7-unit condominium building at 21 Park Road.	Approved project
1095 Rollins Road	0.5 miles east	Burlingame	The City of Burlingame has approved an application for the construction of a new 150-unit apartment development at 1095 Rollins Road, Burlingame. The project site is composed of two parcels that currently contain a restaurant and elevated tennis courts, with parking below. The proposal includes merging the two parcels to create a 46,827 square foot site, demolishing the existing structures and constructing a new 6-story, 150-unit apartment building.	Approved project
128 Lorton Ave	0.2 miles east	Burlingame	The City of Burlingame has approved an application for construction of a new five-story, 19-unit residential condominium building at 128 Lorton Avenue with at-grade enclosed parking garage.	Approved project
30 Ingold Rd	0.2 miles east	Burlingame	The City of Burlingame has approved an application for construction of a new seven-story, 298-unit mixed-use development at 30 Ingold Road, within the RRMU (North Rollins Road Mixed-Use) District.	Approved project
Proposed Eucalyptus Avenue Pathway and Tree Renewal Project	0.5 miles southwest	Hillsborough	Hillsborough is proposing to initiate a tree vegetation renewal program on Eucalyptus Avenue, between the 500 and 700 blocks of Eucalyptus Avenue. The proposed plan includes removing up to 15 aged, non-native Eucalyptus trees; installation of 50 plus local, native trees; landscaped, vegetated shoulders; the addition of approximately 1,400 feet of pedestrian	Conceptual plan

Project Title	Distance to Project	Lead Agency(s)	Description	Project Status
			pathways; and curb and gutter installation for improved storm water conveyance.	
Gateway at the Millbrae Station	0.1 miles northeast	BART	Mixed-use transit-oriented development on approximately 9 acres located at the Millbrae BART Station. The proposal includes 151,583 SF of office space, 320 market-rate apartments units, 80 affordable apartment units, 164 hotel rooms, and 44,123 SF of ground floor retail.	Construction until 2022
City of San Mateo Sustainable Streets Plan	0 Miles	City of San Mateo	The <i>City of San Mateo Sustainable Streets Plan</i> includes goals, objectives, and design guidelines to accommodate all modes of transportation on city roadways using the concepts of “Complete Streets” and “Green Streets.”	Final Plan February 2015

Sources: Caltrain 2020, San Mateo 2020a, San Mateo 2020b, Millbrae 2020a, Burlingame 2020b, Hillsborough 2020, BART 2020, California High-Speed Rail Authority 2020

- **Step 6:** Assess cumulative impacts.
- **Step 7:** Report the results of the cumulative impacts analysis.
- **Step 8:** Assess the need for additional avoidance, minimization, or mitigation measures to address any cumulative impacts.

Under the No Build Alternative, no construction would occur within the project limits. Existing conditions would be perpetuated, and the impacts associated with the Build Alternative (either with or without inclusion of the design option) would not occur. Therefore, this alternative would not contribute to cumulative environmental effects in combination with other projects, and no cumulative impacts would occur.

3.7.3 Resource Areas with No Contribution to Cumulative Effects

Based on the 8-step methodology outlined above, since direct and/or indirect impacts of the Build Alternative are not anticipated for the following resources areas (Caltrans 2005), no cumulative effects from the project are anticipated:

- Consistency with State, Regional, and Local Plans and Programs (Section 3.1.1);
- Community Character and Cohesion (Section 3.1.2);
- Environmental Justice (Section 3.1.3);
- Utilities/Emergency Services (Section 3.1.4);
- Hydrology and Floodplain (Section 3.2.1);
- Water Quality and Storm Water Runoff (Section 3.2.2);
- Energy (Section 3.2.4);
- Natural Communities (Section 3.3.1);
- Animal Species (Section 3.3.2); and
- Invasive Species (Section 3.3.3).

In addition, no cumulative effects from the project are anticipated for any of the topics considered but determined not to be relevant.

3.7.4 Resources Considered for Contribution to Cumulative Effects

The proposed project would result in significant and unavoidable impacts to visual/aesthetic resources and cultural resources due to the removal of approximately 300-350 existing trees including approximately 250 trees that contribute to the Howard-Ralston Eucalyptus Tree Rows. Therefore, a cumulative impact analysis is required for these topic areas, which is presented below.

3.7.4.1 Visual/Aesthetics

The project would adversely affect visual/aesthetic resources under NEPA and CEQA. The Resource Study Area (RSA) for the cumulative visual/aesthetic analysis encompasses the areas within the project limits.

Degradation of Visual Character and Quality

As described in Section 3.1.5.2, there are approximately 700 trees lining both sides of El Camino Real within the project limits. There are approximately 600 trees along El Camino Real between Peninsula Avenue and Ray Drive (the limits of the Howard-Ralston Eucalyptus Tree Rows). A total of 391 of these contribute to the historic Howard-Ralston Eucalyptus Tree Rows. The oversized scale of the historic eucalyptus trees along both sides of El Camino Real dominates the visual experience of the corridor. The tree trunks are several feet in diameter and are over 100 feet tall. Eucalyptus trees have a light-colored trunk with peeling bark, which contrasts strongly with the canopy high overhead composed of elongated, medium-green leaves. The tree-lined character of El Camino Real is continuous throughout the project corridor, but the visual mass of the historic eucalyptus trees is very different from that of younger street trees that have been planted more recently. The younger street trees include both evergreen and deciduous species of different forms, sizes, and ages.

The Howard-Ralston Eucalyptus Tree Rows are widely known and valued in the broader community due to their striking appearance and historic status. The Howard-Ralston Eucalyptus Tree Rows was planted by landscape gardener John McLaren in the 1870s to promote development along the corridor through beautification of the roadway. The Howard-Ralston Eucalyptus Tree Rows are listed on the NRHP.

The historic Howard-Ralston Eucalyptus Tree Rows establish a high degree of vividness as a group and as individual specimens. The degree to which they are out of scale with even the largest of typical street trees is immediately compelling and memorable. However, the trees along El Camino Real within the project limits range in age and health. Many historic trees exhibit signs of disease and have been damaged by infrastructure construction and maintenance throughout their long lives. The health of the resource is considered to be declining and many trees may need to be removed in the coming decades for public safety.

The project would require removal of approximately 300 to 350 of the 700 trees within the project limits including 250 trees that contribute to the Howard-Ralston Eucalyptus Tree Rows. The loss of these trees would change the visual setting notably, dramatically altering the tree-lined character and cohesiveness of the project limits. The project would result in a pronounced adverse effect.

There are five projects including 1457 El Camino Real, 1766 El Camino Real, 1870-1876 El Camino Real, 556 El Camino Real, and 21 Park Road in the City of Burlingame with the potential to change the viewshed within the project limits. They are all new buildings, some of which are taller than existing buildings. However, given the setback requirements along El Camino Real and permit requirements for removal of protected trees by projects authorized by the City of Burlingame, they are unlikely to affect existing trees. Therefore, these projects are unlikely to incrementally contribute to a cumulative impact to the visual resources in the RSA.

No additional avoidance, minimization, or mitigation measures are necessary to address any cumulative impacts.

3.7.4.2 Cultural Resources

The project would adversely affect the Howard-Ralston Eucalyptus Tree Rows under NEPA and would result in a substantial adverse change to this historical resource under CEQA. The Resource Study Area (RSA) for the cumulative cultural analysis encompasses all three McLaren tree rows within the City of Burlingame.

McLaren Tree Rows

The City of Burlingame is known as “The City of Trees” as a result of the efforts of John McLaren, a landscape gardener who planted trees on several large estates encompassing more than 8,000 acres in the City of Burlingame and the surrounding area. The trees were planted between 1874 and 1880. Over time, as urban development occurred throughout the Peninsula, most of the trees were gradually cut down. However, a portion of the eucalyptus and elm trees that were planted along El Camino Real still exist as the approximately 2.2-mile-long Howard-Ralston Eucalyptus Tree Row, which is listed on the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR).

Two other rows of trees planted by John McLaren in the late 1800s remain in the City of Burlingame including the Easton Drive Eucalyptus Tree Rows, a City Heritage Grove (on Easton Drive from El Camino Real to Vancouver Avenue) and two sections of trees that comprise what is known as Parcel I (Jules Francard Grove) and Parcel II. Parcel I (Jules Francard Grove) and Parcel II run parallel to the railroad tracks on California Drive between North Lane and Larkspur Drive. The six-block portion of the trees planted by John McLaren along Easton Drive was designated as a Heritage Grove by the Burlingame City Council in 1976. The project would result in the removal of one tree from the Easton Drive Eucalyptus Tree Rows but would not result in an adverse effect to this resource. The project would not affect the tree rows known as Parcel I (Jules Francard Grove) and Parcel II. Together, these three tree rows make up the RSA considered for this cumulative impact analysis.

Since its incorporation, the City of Burlingame has had a long history of community support to provide legal protection for its heritage trees. In an effort to save the row of eucalyptus and elm trees along El Camino Real from a proposed widening of the county road for commercial development, at the behest of the Burlingame Women’s Club, the City of Burlingame, and Mayor Treadwell enacted an ordinance in 1908 “prohibiting the cutting, injuring or destroying of trees on public streets, highways or parks of the Town of Burlingame.” A year later, the Parks Commission was created by the City’s Board of Trustees. The City of Burlingame has a long history of court battles to preserve the strip of trees along El Camino Real from widening and commercial use, as well as the Francard Grove of trees along the railroad tracks. In 1930, zoning restrictions were created to prohibit commercial development along El Camino Real to preserve the Howard-Ralston Eucalyptus Tree Rows.

Nonetheless, the health of the McLaren tree rows is declining. All of the tree rows have been subject to gradual deterioration over time, due to age, disease, and conflict with infrastructure such as roadways, railroad tracks, and power lines. Where possible, trees that have been substantially pruned or removed have been replaced; however, in many cases the replacement

trees have been of a different species that mature to a smaller size, in order to help reduce fire hazards from conflicts with overhead power lines and from continued roadway and sidewalk damage due to tree roots.

The Howard-Ralston Eucalyptus Tree Rows is within the project limits and would be adversely affected by removal of approximately 250 contributing trees.

As noted in Section 3.7.4.1, there are five projects including 1457 El Camino Real, 1766 El Camino Real, 1870-1876 El Camino Real, 556 El Camino Real, and 21 Park Road in Burlingame with the potential to remove additional trees within the project limits. In addition, two projects (601 California Drive and 619-625 California Drive) are adjacent to the Parcel I (Jules Francard Grove) and Parcel II tree rows. Section 3.7.4.1 noted little potential for the projects on El Camino Real and Park Road to affect tree rows. The projects near the Parcel I (Jules Francard Grove) and Parcel II tree rows are located on the south side of California Drive whereas the tree rows are located on the north side of California Drive. Therefore, these projects would also have little potential for removing or affecting these trees. None of the projects listed in Table 3.7-1 are anticipated to require removal of trees from any of the three McLaren tree rows. Therefore, these projects are unlikely to incrementally contribute to a cumulative impact to the cultural resources in the RSA.

None of the projects identified in Table 3.7-1 would contribute to cumulative impacts to visual/aesthetic or cultural resources. Therefore, no cumulative impacts would occur with the Build Alternative. No additional avoidance, minimization, or mitigation measures are necessary to address any cumulative impacts.

Chapter 4 California Environmental Quality Act Evaluation

4.1 Significant Irreversible Environmental Changes

Significant irreversible environmental changes are discussed in Section 3.6, Irreversible and Irretrievable Commitments of Resources.

4.2 Determining Significance under CEQA

The proposed project is a joint project by Caltrans and the FHWA and is subject to state and federal environmental review requirements. Project documentation, therefore, has been prepared in compliance with both CEQA and the NEPA. FHWA's responsibility for environmental review, consultation, and any other actions required by applicable federal environmental laws for this project are being, or have been, carried out by Caltrans pursuant to 23 USC 327 and the Memorandum of Understanding dated December 23, 2016, and executed by FHWA and Caltrans. Caltrans is the lead agency under CEQA and NEPA.

One of the primary differences between NEPA and CEQA is the way significance is determined. Under NEPA, significance is used to determine whether an EIS, or a lower level of documentation, will be required. NEPA requires that an EIS be prepared when the proposed federal action (project) as a whole has the potential to "significantly affect the quality of the human environment." The determination of significance is based on context and intensity. Some impacts determined to be significant under CEQA may not be of sufficient magnitude to be determined significant under NEPA. Under NEPA, once a decision is made regarding the need for an EIS, it is the magnitude of the impact that is evaluated and no judgment of its individual significance is deemed important for the text. NEPA does not require that a determination of significant impacts be stated in the environmental documents.

CEQA, on the other hand, does require Caltrans to identify each "significant effect on the environment" resulting from the project and ways to mitigate each significant effect. If the project may have a significant effect on any environmental resource, then an EIR must be prepared. Each and every significant effect on the environment must be disclosed in the EIR and mitigated if feasible. In addition, the CEQA Guidelines list a number of "mandatory findings of significance," which also require the preparation of an EIR. There are no types of actions under NEPA that parallel the findings of mandatory significance of CEQA. This chapter discusses the effects of this project and CEQA significance.

4.3 CEQA Environmental Checklist

This checklist identifies physical, biological, social, and economic factors that might be affected by the proposed project. In many cases, background studies performed in connection with the projects will indicate that there are no impacts to a particular resource. A NO IMPACT answer in the last column reflects this determination. The words "significant" and "significance" used throughout the following checklist are related to CEQA, not NEPA, impacts. The questions in this form are intended to encourage the thoughtful assessment of impacts and do not represent thresholds of significance.

Project features, which can include both design elements of the project, and standardized measures that are applied to all or most Caltrans projects such as BMPs and measures included in the Standard Plans and Specifications or as Standard Special Provisions, are considered to be an integral part of the project and have been considered prior to any significance determinations documented below; see Chapters 2 and 3 for a detailed discussion of these features. The annotations to this checklist are summaries of information contained in Chapter 3 in order to provide the reader with the rationale for significance determinations; for a more detailed discussion of the nature and extent of impacts, please see Chapter 3. This checklist incorporates by reference the information contained in Chapters 2 through 3.

AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	-	-	-	X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	-	-	-	X
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	X	-	-	-
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	-	-	-	X

- a) **No Impact.** The project viewshed is limited to views of the project limits or views from within the project limits, including the immediately adjacent buildings and landscaping. The size and number of the surrounding buildings and associated landscaping limits views far beyond the roadway. There are no scenic vistas within the project limits. Thus, there would be no impact.
- b) **No Impact.** El Camino Real within the project limits is not a designated as a State Scenic Highway. Thus, there would be no impact.
- c) **Significant and Unavoidable Impact.** The project is located in a highly urbanized area on state right-of-way that traverses the cities of San Mateo, Burlingame, and Millbrae, and the Town of Hillsborough. However, due to the presence of an extensive visual resource within the project limits, this section discusses both if the project would substantially degrade the existing visual character of the public view and if the project conflicts with applicable zoning and other regulations governing scenic quality.

Defining the Visual Character of the Scenic Resource

As noted in Section 3.1.5, the project limits contain approximately 700 trees; approximately 391 of these trees are part of the historic Howard-Ralston Eucalyptus Tree Rows, which were planted by landscape gardener John McLaren in the late 1800s; they are massive trees, over 100 feet tall, with huge trunks and high canopies. The Howard-Ralston Eucalyptus Tree Rows extend along El Camino Real from Peninsula Avenue to Ray Drive/Rosedale Avenue, in the City of Burlingame. The historic tree rows, along with the other existing established trees, are the primary visual resource in the project limits, and they help to create an intimate, “neighborhood” feel within the area they occur.

The Howard-Ralston Eucalyptus Tree Rows are widely known and valued in the broader community due to their striking appearance and historic status. Within the City of Burlingame, the Howard-Ralston Eucalyptus Tree Rows are a source of pride and identity. The trees were planted by John McLaren in the 1870s to promote development along the corridor through beautification of the roadway. There is a history of protecting the Howard-Ralston Eucalyptus Tree Rows dating back to 1908. Notably, the City of Burlingame passed the first of its kind zoning ordinance in 1930, restricting commercial development along El Camino Real to protect the Howard-Ralston Eucalyptus Tree Rows. Additionally, the city designated the portion of the Howard-Ralston Eucalyptus Tree Rows within their city limits as a “Heritage Grove” in 1975, and the San Mateo Sites Committee has designated the Howard-Ralston Eucalyptus Tree Rows within the City of Burlingame as a “Point of Historic Significance.”

Applicable Zoning and Other Regulations Governing Scenic Quality

The jurisdictions that surround the project limits all have regulations that govern trees, especially the type of trees within the project limits. Examples include:

- Burlingame Municipal Code, Title 11 which regulates actions throughout the City regarding trees and vegetation. The Howard-Ralston Eucalyptus Tree Rows are considered “protected trees” by the City of Burlingame.
- Burlingame’s Zoning Code Table 25.40-3 (Section 25.40.040) defines the minimum width of these setbacks along El Camino Real as 15 to 20 feet, and the setbacks must include a walk zone, landscape planters, and 5-foot-wide tree wells.
- Millbrae’s Municipal Code Chapter 8.60 regulates the City’s Tree Protection and Urban Forestry Program, which was established to maintain established trees and maximize tree cover; promote a stable and sustainable urban forest; and promote and maintain the aesthetic value of the community.
- San Mateo’s Municipal Code Chapter 13.52 sets forth the City’s Heritage Tree Ordinance which states the City has been forested with a variety of healthy and valuable trees which must be protected and preserved for the health and welfare of its citizens.

- Hillsborough Municipal Code Chapter 14.04 sets forth the Town's Tree Removal Ordinance with the intent to establish regulations for the removal of trees in order to retain as many trees as possible (consistent with the ordinance) and maintain the reasonable economic enjoyment of private property.

The project would be implemented on land owned by the state, and as a state agency, Caltrans is not subject to local plans, policies, and ordinances. However, Caltrans has taken the local ordinances into consideration when designing the project. In addition, Caltrans has met with representatives from the local jurisdictions to discuss this project, including participating in the El Camino Real Task Force. The recommendations of the Task Force will be included during final design, where feasible.

Impacts to Existing Visual Character or Quality of Public Views

Visual simulations of three key views were prepared for the Build Alternative (either with or without inclusion of the design option) in order to demonstrate the change in visual character and help evaluate the change in visual quality. They are presented in Figures 3.1.5-5 through 3.1.5-10. These simulations include the avoidance, minimization, and mitigation measures listed in Section 3.1.5.4 and are shown 20 years after project completion.

The Build Alternative (either with or without inclusion of the design option) would require removal of approximately 300 to 350 trees, including 250 trees that contribute to the Howard-Ralston Eucalyptus Tree Rows. As discussed in detail in Section 3.1.5.3, tree removal would change the visual setting notably, dramatically altering the tree-lined character and cohesiveness of these views. While the existing roadway configuration and width would be retained, the view would become very open and the intimate feeling would be lost without the double rows of large, historic trees, and their enclosing canopy. Following project construction, these views would no longer retain the same visual character due to the tree loss. Therefore, this change represents a potentially significant impact to public views.

Therefore, the project would implement avoidance, minimization, and mitigation measures VIS-1 through VIS-5. The Build Alternative (without the design option) would not allow for a return to the visual character that exists today. The restrictions on tree replacement under and around PG&E infrastructure would result in 30 percent fewer trees being replanted and an uneven distribution of trees after 20 years. Therefore, the Build Alternative would result in a **Significant and Unavoidable** impact.

Implementation of the Build Alternative with the design option included along with avoidance, minimization, and mitigation measures VIS-1 through VIS-5 would allow for a return to the visual character that exists today. Until the trees reach maturity (after approximately 20 years), the impact would be significant. After 20 years, the impact would be less than significant. Therefore, the Build Alternative with the design option would result in a **Less Than Significant Impact with Mitigation Incorporated**.

- d) **No Impact.** The project-related improvements would not change the amount of lighting or glare as compared to existing conditions. Thus, there would be **no impact**.

AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	-	-	-	X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	-	-	-	X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	-	-	-	X
d) Result in the loss of forest land or conversion of forest land to nonforest use?	-	-	-	X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to nonforest use?	-	-	-	X

a, b, c, d, and e) **No Impact.** There are no designated farmlands or forest lands within or adjacent to the project limits (CDOC 2021). The project is located within an urbanized area and would not convert any farmland to non-agricultural use; convert any forest land to non-forest use; or conflict with existing agricultural or timberland zoning.

AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	-	-	X	-
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	-	-	X	-
c) Expose sensitive receptors to substantial pollutant concentrations?	-	-	X	-
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	-	-	X	-

a, b, c, d, and e) **Less Than Significant Impact.** The project is located in the San Francisco Bay Area Air Basin (SFBAAB) and is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). The project is included in the ABAG and MTC most recent Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), *Plan Bay Area 2040*, which was found to be conforming. The Build Alternative would not interfere with the implementation of *Plan Bay Area 2040*. This project is not a capacity-increasing transportation project and the project would generate a less-than-significant amount of pollutants during construction due to the temporary nature of project construction. With implementation of construction standards adopted by BAAQMD and Caltrans-standardized procedures for minimizing air pollutants during construction (as described in Section 2.1.1.3), the project would not violate or contribute to a violation of any air quality standard, result in a cumulatively considerable net increase of any criteria pollutant, expose sensitive receptors to substantial pollutant concentrations, or result in emissions or odors that would adversely affect a substantial number of people.

BIOLOGICAL RESOURCES

Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, or U.S. Fish and Wildlife Service, or NOAA Fisheries?	-	-	X	-
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	-	-	-	X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	-	-	-	X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	-	-	-	X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	-	-	X	-
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	-	-	-	X

- a) **Less Than Significant Impact.** No threatened or endangered species (federal or state) are present within the project limits. No special-status plants were noted within the project limits. The only special-status animal species found within the BSA, as described in Section 3.3.1, were birds subject to the MBTA. However, the Contractor would be required to implement BMPs, described in Section 3.3.2.3 to reduce conflicts with nesting birds.
- b) **No Impact.** As described in Section 3.3.1.1, riparian corridors exist at some of the creek crossings within the BSA, including Cherry Canyon Creek, Sanchez Creek, and Mills Creek. Project construction would be limited to the existing roadway, sidewalks, driveways, and other previously disturbed surfaces. The project would perform no construction activities within waterways or riparian corridors. Therefore, the project would have no impact on natural communities.

- c) **No Impact.** Waterways under the jurisdiction of the USACE were found adjacent to the project limits, but no such wetlands are present within the project limits. The project does not require any in-water work.
- d) **No Impact.** Project construction would be limited to the existing roadway, sidewalks, driveways, and other previously disturbed surfaces. The project would have no impact on any migratory wildlife corridors or the movement of any native resident or migratory fish or wildlife species, and it would not impede the use of native wildlife nursery sites.
- e) **Less Than Significant Impact.** As noted for question C under Aesthetics in this section, the project would be constructed on land owned by the state, and as a state agency, Caltrans is not subject to local plans, policies, and ordinances. However, Caltrans has taken the local ordinances into consideration when designing the project. In addition, Caltrans has met with representatives from the local jurisdictions to discuss this project, including participating in the El Camino Real Task Force. The recommendations of the Task Force will be included during final design, where feasible.
- f) **No Impact.** There are no Habitat Conservation Plans (HCP) or Natural Community Conservation Plans in the BSA with jurisdiction over this project type, as described in Section 3.3.1.1.

CULTURAL RESOURCES

Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	X	-	-	-
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	-	-	-	X
c) Disturb any human remains, including those interred outside of formal cemeteries?	-	-	X	-

- a) **Significant and Unavoidable Impact.** As described in Section 3.1.6.3, the Build Alternative (both with or without the design option) has the potential to change features of some historic resources. See Table 3.1.6-2 for a summary of how the Build Alternative would directly and indirectly affect architectural resources within the APE.

The project would remove 250 of the 391 trees that contribute to the Howard-Ralston Eucalyptus Tree Rows. The project also has the potential to directly affect the roots of additional contributing trees that may be within the existing roadway. Potential damage to tree roots encountered during construction could result in additional unanticipated tree removal. Contributing eucalyptus and elm trees that require removal would be replaced according to the Replanting Plan in Appendix F. However, the loss of contributing trees would constitute physical destruction of part of the historic property. Removal of the contributing trees would diminish the integrity of location, design, materials, workmanship, feeling, and association of the Howard-Ralston Eucalyptus Tree Rows, resulting in a Finding of Adverse Effect on the Howard-Ralston Eucalyptus Tree Rows. Before the implementation of CUL-1 through CUL-9, the project would represent a significant and unavoidable impact. Even with implementation of CUL-1 through CUL-9, the project would result in a substantial adverse change in the significance of the Howard-Ralston Eucalyptus Tree Rows and would represent a **significant and unavoidable impact**.

Three historic resources (1479 El Camino Real, Burlingame; 1265 El Camino Real, Burlingame; and 1041 El Camino Real, Burlingame) each contain character-defining features that are within existing state right-of-way. Some of these features would be removed to construct the Build Alternative (with and without the inclusion of the design option), resulting in some impairment. However, this removal would not result in substantial impairment of these three historic resources because their remaining character-defining features would not be impacted by the Build Alternative. Therefore, implementation of the Build Alternative would not affect the eligibility of these three from inclusion on the NRHP and the impacts would be **less than significant**.

The Build Alternative may require the removal of one tree from the Easton Drive Eucalyptus Tree Rows. Removal of one tree from the approximately 63 trees included in the Easton Drive Eucalyptus Tree Rows is not enough to diminish what makes the Easton Drive Eucalyptus Tree Rows potentially eligible for the NRHP. The remaining trees would still convey the overall presence of two rows of trees lining Easton Drive. The experience of passersby would also not change. Therefore, the impacts would be **less than significant**. Additionally, twenty-one historic properties within the project corridor will have a less than significant impact, and the project will have no impact on two historic properties.

- b) **No Impact.** Three archaeological resources were previously recorded within the archaeological APE. Field surveys and Extended Phase 1 testing found the sites are not present within the APE. In addition, a total of 27 cores were excavated and areas did not appear to be highly or very highly sensitive for buried archaeology, as previously mapped (Blake 2019). No intact archaeological materials were identified within the project limits. The project is not anticipated to affect any archaeological resources.
- c) **Less Than Significant Impact.** There are no known interred human remains within the project vicinity. Standard Caltrans practices described in Section 2.1.1.3 would be followed should human remains be discovered.

ENERGY

Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	-	-	-	X
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	-	-	-	X

- a) **No Impact.** While energy use during construction is dependent on the equipment being used for each activity at any given time, the total consumption for the 3-year project span is estimated to be approximately 117,000 gallons of diesel fuel and approximately 4,000 gallons of gasoline fuel. The short-term energy consumption required during construction would allow for the long-term, continued operation of El Camino Real. No additional energy use would be necessary during operation beyond that of existing operations. Therefore, energy use during construction would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Because construction activities are short-term, the increase of energy consumption within the project limits would also be short-term.

As described in Section 3.2.4.3, the project would not result in changes to traffic volumes, vehicle mix, or any other factor that would cause an increase in energy consumption (i.e., vehicle fuel) of the project from that of the existing condition. The project includes several features to reduce indirect energy consumption. The project would not result in an inefficient, wasteful, and unnecessary consumption of energy.

- b) **No Impact.** The project would increase the ease and appeal of pedestrian mobility and decrease the energy used on maintenance of the roadway. Therefore, the project would not conflict with a state or local plan for renewable energy or energy efficiency.

GEOLOGY AND SOILS

Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	-	-	-	X
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	-	-	-	X
ii) Strong seismic ground shaking?	-	-	-	X
iii) Seismic-related ground failure, including liquefaction?	-	-	-	X
iv) Landslides?	-	-	-	X
b) Result in substantial soil erosion or the loss of topsoil?	-	-	-	X
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	-	-	-	X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	-	-	-	X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	-	-	-	X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	-	-	-	X

a) **No Impact.** No active or potentially active faults cross the project limits therefore, the risk of surface fault rupture does not exist. However, the project limits may be subject to strong ground motions from nearby earthquake sources during the design life of the proposed retaining walls. Additionally, based on the project’s preliminary geotechnical report, the potential for liquefaction does not exist in the locations of the proposed retaining walls due to the presences of clayey and dense sandy materials (Caltrans 2020b). However, because of strong shaking motion, localized liquefaction may occur due to the presence of medium dense sandy lenses. The project limits are located in a fairly flat area and no major fills are proposed for the project; therefore, landslide and slope instability are not of concern.

Although the project could be affected by faults that have the potential of producing strong seismic shaking during an earthquake, Caltrans' design and construction guidelines incorporate engineering standards that address seismic risks. Project elements will be designed and constructed to meet seismic design requirements for ground shaking and ground motions, as determined for the project vicinity and site conditions. Caltrans also requires additional geotechnical subsurface and design investigations to be performed during the final project design and engineering phase. These standards and requirements would minimize the risk of the project being damaged during a seismic event. Due to the lack of project structures included in the proposed project, the project would not cause a potential substantial risk of loss, injury, or death from a seismic event.

- b) **No Impact.** A Storm Water Pollution Prevention Plan (SWPPP) will be prepared before project construction, which would require implementation of BMPs to minimize erosion and topsoil loss. Potential erosion and transportation of soil particles would be managed through standard construction BMPs, such as installation of silt fences, which would substantially reduce potential sediment transport from the construction site. With implementation of BMPs required by the SWPPP and Caltrans standards and requirements as described in Sections 2.1.1.2 and 2.1.1.3, there would be no impact.
- c) **No Impact.** The risk of lateral spreading due to sloping ground conditions or open stream banks does not exist within the project limits. Discussion of earthquake-induced landslides and other seismic related ground failure are discussed previously under Impact (a).
- d) **No Impact.** The project would not include construction of habitable structures, and therefore is not expected to create substantial risks to life or property. Since the soil is classified as Urban Land, properties such as shrink-swell have not been rated.
- e) **No Impact.** The project would not include the use of septic tanks or alternative wastewater disposal systems.
- f) **No Impact.** The project would take place entirely on previously disturbed soil, however, there remains a very low potential for paleontological resources to be found during construction based on the geology underlying the project limits as discussed at the beginning of Chapter 3. Implementation of Caltrans' Standard Specification 14-7.03 that provides for stopping work, securing the area, and performing further investigation if paleontological resources are encountered during project construction would ensure any impacts to paleontological resources remain less than significant.

GREENHOUSE GAS EMISSIONS

Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	-	-	X	-
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	-	-	-	X

- a) **Less than Significant Impact.** Section 4.5.3. provides an analysis of construction-related and operational GHG emissions.

Construction-related GHG emissions were calculated using the Road Construction Emissions Model (RCEM), version 9.0.0, provided by the Sacramento Metropolitan Air Quality Management District. The total project construction duration would be 36 months and the total amount of CO₂ produced due to construction would be 1,343.81 tons. While the project would result in GHG emissions during construction, because the project would not increase the number of travel lanes on El Camino Real, no increase in vehicle miles traveled would occur. Therefore, it is anticipated that the project would not result in any increase in operational GHG emissions and construction-related impacts would be less than significant with implementation of standard construction GHG-reduction measures as identified in Section 4.5.4.

- b) **No Impact.** Section 4.5.4. describes the various GHG reduction strategies Caltrans is committed to implementing to reduce GHG emissions.

As discussed above, no increase in vehicle miles traveled would occur as result of the project. The project would be consistent with SB 375 as it is included in the current RTP, *Plan Bay Area 2040* and will incorporate applicable GHG reduction measures from the RTP. The project includes significant upgrades to the pedestrian infrastructure within the project limits that would promote walking. This would help decrease the Bay Area’s per-capita carbon dioxide production. In addition, the project would not generate GHG emissions that would have a significant impact on the environment as discussed above. Therefore, the project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.

HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	-	-	-	X
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	-	-	-	X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	-	-	-	X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	-	-	X	-
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	-	-	-	X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	-	-	-	X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	-	-	-	X

- a, b) **No Impact.** Project construction and maintenance activities are expected to involve the routine transport, use, and disposal of hazardous materials (e.g., fuels, paints, and lubricants) that could pose a significant threat to human health or the environment if not properly managed. Adherence to federal and state regulations during project construction and maintenance would reduce the risk of exposure to hazardous materials and accidental hazardous materials releases. Compliance with existing regulations is mandatory; therefore, construction of the project is not expected to create a hazard to construction workers, the public, or the environment through the routine transport, use, disposal, or accidental release of hazardous materials.
- c) **No Impact.** There are schools within 0.25 mile of the project limits; however, compliance with existing regulations would limit the risk of emitting or handling hazardous materials near the schools.
- d) **Less than Significant Impact.** There were no active hazardous waste sites within the state right-of-way identified pursuant to Government Code Section 65962.5 (Cortese

- List) (CalEPA 2021a, 2021b; DTSC 2021; SWRCB 2021). However, there are five hazardous materials release sites near the project corridor that have been identified as having the potential for project construction work (i.e. subsurface work) to be affected by groundwater contaminant plumes. As noted in section 2.1.1.3, during the final project design phase, Caltrans would perform a PSI to investigate hazardous materials concerns related to soil, groundwater, and building materials within the project limits and include appropriate measures for managing hazardous materials encountered during project construction in compliance with all regulatory requirements adopted to protect human health and the environment. These measures would be incorporated in the final project design.
- e) **No Impact.** The nearest airport is San Francisco International Airport (SFO), approximately one mile north of the project limits. The project is not within an identified noise level contour for the airport (City of South San Francisco 2015). Therefore, the project would not result in a safety hazard or excessive noise for people residing near or working within the project limits.
- f) **No Impact.** Construction activities would result in temporary lane closures, increased construction truck traffic, and other roadway effects on El Camino Real that could impede emergency response or evacuations. However, law enforcement, fire, and emergency services and access would be maintained during project construction, and these effects would be temporary and short-term in nature. In addition, during construction, the TMP will minimize construction-related delays and include coordination with CHP and local law enforcement agencies. Therefore, the project would not impair implementation of an emergency response or emergency evacuation plan.
- g) **No Impact.** The project is not within a State Responsibility Area or within a Very High Fire Hazard Severity Zone, and it is more than 0.75 mile from the nearest such area or zone (CAL FIRE 2021). In addition, El Camino Real in the project limits is not identified as an area subject to increased wildfire risk for the analysis years 2025, 2055, or 2085. Project construction and operation would not expose people or structures to significant risks involving wildland fires.

HYDROLOGY AND WATER QUALITY

Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	-	-	X	-
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	-	-	-	X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation on- or off-site;	-	-	-	X
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	-	-	-	X
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	-	-	-	X
(iv) impede or redirect flood flows?				X
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	-	-	-	X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	-	-	-	X

- a) **Less Than Significant Impact.** Project construction is anticipated to result in a disturbed soil area (DSA) of approximately 29.5 acres. Temporary impacts to water quality may occur from the release of fluids, concrete material, construction debris, sediment, and litter beyond the perimeter of staging and active construction areas, including potential changes to localized pH and turbidity of San Mateo Creek. The project would also have the potential to encounter groundwater during the construction of cast-in-drilled-hole piles for traffic lights and other signs. Because disturbed areas in the project site would be greater than 1 acre, a SWPPP would be required. The SWPPP would address temporary water quality impacts resulting from construction activities via implementation of appropriate BMPs. In addition, since the total new and replaced impervious surface is greater than 1 acre, the project will provide storm water treatment (i.e., bioretention or biofiltration devices), which is expected to prevent any long-term impact of pollutant discharge to water bodies.

- b) **No Impact.** The project would not add new impervious area within the project limits; therefore, the project is not anticipated to decrease groundwater supplies or interfere with groundwater recharge in the Westside Basin.
- c) **No Impact.** The project would not alter the course of a stream or river and would not add new impervious areas nor remove access to existing drainages within the project limits. In addition, the project would improve roadway drainage to reduce localized roadway flooding.

Implementation of standard Caltrans practices for erosion control and appropriate BMPs from the SWPPP, as described in Section 2.1.1.2, would avoid or minimize the project's potential to result in substantial erosion or siltation, increase runoff volumes in a way that would result in flooding, exceed drainage system capacity or provide substantial polluted runoff, or impede or redirect flood flows.

- d) **No Impact.** Except for four waterways noted in Section 3.2.1.2, the majority of El Camino Real within the project limits overlap Zone X (0.2 percent annual chance of flooding), for minimal flood hazard, from Peninsula Avenue to Murchison Drive. East Santa Inez Avenue to Peninsula Avenue and Murchison Drive to Millbrae Avenue have a minimal flood hazard. The project does not include any features that would increase the risk of flooding.
- e) **No Impact.** For the reasons described in a) through c) above, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. In addition, the project is required to adhere to the Clean Water Act, the Porter-Cologne Water Quality Control Act, and the Caltrans MS4 Permit.

LAND USE AND PLANNING

Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	-	-	-	X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	-	-	-	X

- a) **No Impact.** The project would be constructed within existing state right-of-way and would not physically divide an established community.
- b) **No Impact.** The project would be generally consistent with all applicable land use plans, policies, and regulations. The project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect.

MINERAL RESOURCES

Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	-	-	-	X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	-	-	-	X

- a), b) **No Impact.** Project construction would occur within heavily disturbed soils, therefore no impacts to known mineral resources are expected to occur from project construction. In addition, according to the U.S. Geological Survey Mineral Resources On-Line Spatial Data, the project site is not in close proximity to or on a known mineral resource (USGS 2021).

NOISE

Would the project result in:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	-	X	-	-
b) Generation of excessive groundborne vibration or groundborne noise levels?	-	-	-	X
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	-	-	-	X

- a) **Less Than Significant with Mitigation Incorporated.** Section 3.4, Construction Impacts (Noise) discusses potential temporary construction noise impacts, project features to reduce potential temporary noise impacts, and proposed avoidance, minimization, and mitigation measures to address potential temporary noise impacts. Per 2018 Caltrans Standard Specifications Section 14-8.02, construction activities are not to exceed 86 dBA L_{max} at a distance of 50 feet from 9 p.m. to 6 a.m. In addition, California Streets and Highway Code Section 216 requires that average hourly construction noise (as measured by L_{eq}) heard internally at school locations not exceed 52 dBA. However, all construction activities modelled would exceed these noise limits for at least one location within the project limits. Therefore, the project could have a potentially significant impact before mitigation.

Implementation of Measure NOI-1 and NOI-2 would reduce short-term construction noise impacts in these areas to **less than significant**. Therefore, the impact would be **Less than Significant with Mitigation Incorporated**.

- b) **No Impact.** The project does not contain features that would produce excess groundborne noise for nearby receptors.
- c) **No Impact.** The nearest airport is SFO, approximately one mile north of the project limits. The project is not within an identified noise level contour for the airport (City of South San Francisco 2015). Therefore, the project would not expose construction workers to excessive noise from airports.

POPULATION AND HOUSING

Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	-	-	-	X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	-	-	-	X

- a) **No Impact.** The project would not induce substantial population growth, directly (e.g., construction of new homes or businesses) or indirectly (e.g., through extension of roads or other infrastructure). The proposed improvements to El Camino Real would not induce planned growth in or around the project limits because they would not remove obstacles to development or provide new access to any undeveloped land. Therefore, the project would not induce substantial population growth, either directly or indirectly.
- b) **No Impact.** The project would not require residential or business relocation and, therefore, would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Fire protection?	-	-	-	X
Police protection?	-	-	-	X
Schools?	-	-	-	X
Parks?	-	-	-	X
Other public facilities?	-	-	-	X

- a) **No Impact.** The project would not involve construction of new housing or other land uses that could increase the local population and demand for governmental facilities and services, such as fire protection, police protection, schools, or parks.

RECREATION

	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	-	-	-	X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	-	-	-	X

- a) **No Impact.** The project would not create additional recreational demand that would increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would occur or be accelerated.
- b) **No Impact.** The project would not include recreational facilities or require the construction or expansion of recreational facilities.

TRANSPORTATION

Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	-	-	-	X
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	-	-	-	X
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	-	-	-	X
d) Result in inadequate emergency access?	-	-	X	-

- a) **No Impact.** The project would not change the existing circulation pattern as it does not involve changing the number or operation of lanes within the project limits and would therefore be consistent with applicable programs, plans, ordinances, and policies regarding the circulation system (including transit, roadway, bicycle, and pedestrian facilities), which are described in Sections 3.1.1.2.

- b) **No Impact.** The project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). The project would not result in an increase in vehicle miles traveled as there would be no change to the number of travel lanes on El Camino Real within the project limits.
- c) **No Impact.** The project would include improvements along the same alignment as the existing facility and would not increase hazards due to a geometric design feature.
- d) **Less Than Significant Impact.** Temporary lane closures on El Camino Real would be required to construct the project. During final design, a TMP will be developed for the project to minimize construction-related delays and inconvenience for travelers within the project limits. The TMP will include distribution of press releases and other documents as necessary to notify local jurisdictions, agencies, and the public of upcoming lane closures; coordination with CHP and local law enforcement on contingency plans; and specifications for using portable changeable message signs and the CHP Construction Zone Enhanced Enforcement Program where possible to minimize delays. Law enforcement, fire, and/or emergency services and access would be maintained during project construction and operation of the lanes. The project is not expected to result in inadequate emergency access.

TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	-	-	-	X
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	-	-	-	X

a, b) Section 3.1.6.2. provides an overview of Native American consultation conducted. The project would not affect any tribal cultural resources, as described in Section 3.1.6.3.

UTILITIES AND SERVICE SYSTEMS

Would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	-	-	-	X
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	-	-	-	X
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	-	-	-	X
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	-	-	-	X
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	-	-	-	X

- a) **No Impact.** The project would temporarily relocate some PG&E overhead electrical lines and poles during construction, as discussed in Section 3.1.4.2. Under the Build Alternative, these relocations would be replaced aboveground following construction. With the design option, overhead electrical lines and telecommunications services would be temporarily relocated during construction then placed under the roadway following construction from Barroilhet Avenue (PM 12.9) to Ray Drive/Rosedale Avenue (PM 15.2) in the City of Burlingame. These relocations may result in short-term, temporary interruptions of service. Final verification of utilities would be performed during the project's detailed design phase, and any needed relocations would be coordinated with the affected utility owner to minimize potential interruptions of service. No impacts to water service are anticipated.
- b) **No Impact.** The project does not include new development or uses that would require water supplies.
- c) **No Impact.** The project would not generate new wastewater flows or affect public utilities for wastewater treatment.
- d) e) **No Impact.** The project would not generate or require solid waste disposal in excess of state or local standards, or in excess of the capacity of local infrastructure. Construction waste that could not be recycled would be disposed at a certified facility based on the waste type and would not affect landfill capacity. The project would comply with federal, state, and local statutes and regulations related to solid waste.

WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	-	-	-	X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	-	-	-	X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	-	-	-	X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	-	-	-	X

a, b, c, and d) **No Impact.** The project is not within a State Responsibility Area or within a Very High Fire Hazard Severity Zone, and it is more than 0.75 mile from the nearest such area or zone (CAL FIRE 2021). In addition, El Camino Real in the project limits is not identified as an area subject to increased wildfire risk for the analysis years 2025, 2055, or 2085.

MANDATORY FINDINGS OF SIGNIFICANCE

MANDATORY FINDINGS OF SIGNIFICANCE	Significant and Unavoidable Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	X	-	-	-
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	-	-	X	-
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	-	X	-	-

- a) **Significant and Unavoidable.** The project would have a significant and unavoidable impact to the Howard-Ralston Eucalyptus Tree Rows and could substantially degrade the quality of the environment through changes to the visual character of public views within the project limits due to the necessity of removing approximately 300 to 350 trees. The Howard-Ralston Eucalyptus Tree Rows are a historical resource and important example of a major period of California history. Before and after mitigation, the project would represent a significant and unavoidable impact.
- b) **Less Than Significant Impact.** The project has been evaluated for cumulative impacts as described in Section 3.7. The project would incrementally affect the visual and cultural resources, but would not, in taken with other past, present, and reasonably foreseeable projects, contribute to a cumulative impact.
- c) **Less Than Significant with Mitigation Incorporated.** As described for Noise, before mitigation, project construction could potentially cause substantial adverse effects on human beings in relation to noise potentially causing a significant impact before mitigation. With implementation of NOI-1 and NOI-2, noise impacts would be lessened during project construction resulting in a less than significant with mitigation incorporated.

4.4 Wildfire

4.4.1 Regulatory Setting

Senate Bill 1241 required the Office of Planning and Research, the Natural Resources Agency, and the California Department of Forestry and Fire Protection to develop amendments to the “CEQA Checklist” for the inclusion of questions related to fire hazard impacts for projects located on lands classified as very high fire hazard severity zones. The 2018 updates to the CEQA Guidelines expanded this to include projects “near” these very high fire hazard severity zones.

4.4.2 Affected Environment

The project limits are not within a State Responsibility Area or within a Very High Fire Hazard Severity Zone, and it is more than 0.75 miles from the nearest such area or zone (CAL FIRE 2021). In addition, El Camino Real in the project limits is not identified as an area subject to increased wildfire risk for the analysis years 2025, 2055, or 2085.

4.4.3 Environmental Consequences

Neither the No Build nor the Build Alternative (either with or without inclusion of the design option) would impair an emergency response plan or emergency evacuation plan and would not exacerbate the risk of wildfire.

4.4.4 Avoidance, Minimization, and/or Mitigation Measures

None required.

4.5 Climate Change

Climate change refers to long-term changes in temperature, precipitation, wind patterns, and other elements of the earth's climate system. An ever-increasing body of scientific research attributes these climatological changes to greenhouse gas (GHG) emissions, particularly those generated from the production and use of fossil fuels.

While climate change has been a concern for several decades, the establishment of the Intergovernmental Panel on Climate Change (IPCC) by the United Nations and World Meteorological Organization in 1988 led to increased efforts devoted to GHG emissions reduction and climate change research and policy. These efforts are primarily concerned with the emissions of GHGs generated by human activity, including carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), tetrafluoromethane, hexafluoroethane, sulfur hexafluoride (SF₆), and various hydrofluorocarbons (HFCs). CO₂ is the most abundant GHG; while it is a naturally occurring component of Earth's atmosphere, fossil-fuel combustion is the main source of additional, human-generated CO₂.

Two terms are typically used when discussing how we address the impacts of climate change: “greenhouse gas mitigation” and “adaptation.” Greenhouse gas mitigation covers the activities and policies aimed at reducing GHG emissions to limit or “mitigate” the impacts of climate change. Adaptation, on the other hand, is concerned with planning for and responding to impacts resulting from climate change (such as adjusting transportation design standards to withstand more intense storms and higher sea levels). This analysis will include a discussion of both.

4.5.1 Regulatory Setting

This section outlines federal and state efforts to comprehensively reduce GHG emissions from transportation sources.

4.5.1.1 Federal

To date, no national standards have been established for nationwide mobile-source GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level.

The National Environmental Policy Act (NEPA) (42 United States Code [USC] Part 4332) requires federal agencies to assess the environmental effects of their proposed actions prior to making a decision on the action or project.

The Federal Highway Administration (FHWA) recognizes the threats that extreme weather, sea-level change, and other changes in environmental conditions pose to valuable transportation infrastructure and those who depend on it. FHWA therefore supports a sustainability approach that assesses vulnerability to climate risks and incorporates resilience into planning, asset management, project development and design, and operations and maintenance practices (FHWA 2019). This approach encourages planning for sustainable highways by addressing climate risks while balancing environmental, economic, and social values—“the triple bottom line of sustainability” (FHWA n.d.). Program and project elements that foster sustainability and resilience also support economic vitality and global efficiency, increase safety and mobility, enhance the environment, promote energy conservation, and improve the quality of life.

Various efforts have been promulgated at the federal level to improve fuel economy and energy efficiency to address climate change and its associated effects. The most important of these was the Energy Policy and Conservation Act of 1975 (42 USC Section 6201) and Corporate Average Fuel Economy (CAFE) Standards. This act establishes fuel economy standards for on-road motor vehicles sold in the United States. Compliance with federal fuel economy standards is determined through the CAFE program based on each manufacturer's average fuel economy for the portion of its vehicles produced for sale in the United States.

Energy Policy Act of 2005, 109th Congress H.R.6 (2005–2006): This act sets forth an energy research and development program covering: (1) energy efficiency; (2) renewable energy; (3) oil and gas; (4) coal; (5) the establishment of the Office of Indian Energy Policy and Programs within the Department of Energy; (6) nuclear matters and security; (7) vehicles and motor fuels, including ethanol; (8) hydrogen; (9) electricity; (10) energy tax incentives; (11) hydropower and geothermal energy; and (12) climate change technology.

The U.S. EPA in conjunction with the National Highway Traffic Safety Administration (NHTSA) is responsible for setting GHG emission standards for new cars and light-duty vehicles to significantly increase the fuel economy of all new passenger cars and light trucks sold in the United States. Fuel efficiency standards directly influence GHG emissions.

4.5.1.2 State

California has been innovative and proactive in addressing GHG emissions and climate change by passing multiple Senate and Assembly bills and executive orders (EOs) including, but not limited to, the following:

EO S-3-05 (June 1, 2005): The goal of this EO is to reduce California's GHG emissions to: (1) year 2000 levels by 2010, (2) year 1990 levels by 2020, and (3) 80 percent below year 1990 levels by 2050. This goal was further reinforced with the passage of Assembly Bill (AB) 32 in 2006 and Senate Bill (SB) 32 in 2016.

Assembly Bill (AB) 32, Chapter 488, 2006, Núñez and Pavley, The Global Warming Solutions Act of 2006: AB 32 codified the 2020 GHG emissions reduction goals outlined in EO S-3-05, while further mandating that the California Air Resources Board (ARB) create a scoping plan and implement rules to achieve "real, quantifiable, cost-effective reductions of greenhouse gases." The Legislature also intended that the statewide GHG emissions limit continue in existence and be used to maintain and continue reductions in emissions of GHGs beyond 2020 (Health and Safety Code [H&SC] Section 38551(b)). The law requires ARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

EO S-01-07 (January 18, 2007): This order sets forth the low carbon fuel standard (LCFS) for California. Under this EO, the carbon intensity of California's transportation fuels is to be reduced by at least 10 percent by the year 2020. ARB re-adopted the LCFS regulation in September 2015, and the changes went into effect on January 1, 2016. The program establishes a strong framework to promote the low-carbon fuel adoption necessary to achieve the governor's 2030 and 2050 GHG reduction goals.

Senate Bill (SB) 375, Chapter 728, 2008, Sustainable Communities and Climate Protection: This bill requires ARB to set regional emissions reduction targets for passenger vehicles. The Metropolitan Planning Organization (MPO) for each region must then develop a "Sustainable Communities Strategy" (SCS) that integrates transportation, land-use, and housing policies to plan how it will achieve the emissions target for its region.

SB 391, Chapter 585, 2009, California Transportation Plan: This bill requires the state's long-range transportation plan to identify strategies to address California's climate change goals under AB 32.

EO B-16-12 (March 2012) orders State entities under the direction of the Governor, including ARB, the California Energy Commission, and the Public Utilities Commission, to support the rapid commercialization of zero-emission vehicles. It directs these entities to achieve various benchmarks related to zero-emission vehicles.

EO B-30-15 (April 2015) establishes an interim statewide GHG emission reduction target of 40 percent below 1990 levels by 2030 to ensure California meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050. It further orders all state agencies with jurisdiction over sources of GHG emissions to implement measures, pursuant to statutory authority, to achieve reductions of GHG emissions to meet the 2030 and 2050 GHG emissions reductions targets. It also directs ARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent (MMTCO_{2e}). Finally, it requires the Natural Resources Agency to update the state's climate adaptation strategy, *Safeguard California*, every 3 years, and to ensure that its provisions are fully implemented.

SB 32, Chapter 249, 2016, codifies the GHG reduction targets established in EO B-30-15 to achieve a mid-range goal of 40 percent below 1990 levels by 2030.

SB 1386, Chapter 545, 2016, declared "it to be the policy of the state that the protection and management of natural and working lands ... is an important strategy in meeting the state's greenhouse gas reduction goals, and would require all state agencies, departments, boards, and commissions to consider this policy when revising, adopting, or establishing policies, regulations, expenditures, or grant criteria relating to the protection and management of natural and working lands."

AB 134, Chapter 254, 2017, allocates Greenhouse Gas Reduction Funds and other sources to various clean vehicle programs, demonstration/pilot projects, clean vehicle rebates and projects, and other emissions-reduction programs statewide.

SB 743, Chapter 386 (September 2013): This bill changes the metric of consideration for transportation impacts pursuant to CEQA from a focus on automobile delay to alternative methods focused on vehicle miles traveled, to promote the state's goals of reducing greenhouse gas emissions and traffic related air pollution and promoting multimodal transportation while balancing the needs of congestion management and safety.

SB 150, Chapter 150, 2017, Regional Transportation Plans: This bill requires ARB to prepare a report that assesses progress made by each metropolitan planning organization in meeting their established regional greenhouse gas emission reduction targets.

EO B-55-18 (September 2018) sets a new statewide goal to achieve and maintain carbon neutrality no later than 2045. This goal is in addition to existing statewide targets of reducing GHG emissions.

EO N-19-19 (September 2019) advances California's climate goals in part by directing the California State Transportation Agency to leverage annual transportation spending to reverse the trend of increased fuel consumption and reduce GHG emissions from the transportation sector. It orders a focus on transportation investments near housing, managing congestion, and encouraging alternatives to driving. This EO also directs ARB to encourage automakers to produce more clean vehicles, formulate ways to help Californians purchase them, and propose strategies to increase demand for zero-emission vehicles.

4.5.2 Environmental Setting

The project is along El Camino Real within the cities of San Mateo, Burlingame, and Millbrae, and the Town of Hillsborough in San Mateo County. The project limits are surrounded by densely urbanized land uses consisting of mixed residential and commercial development. El Camino Real within the project limits is a four-lane undivided conventional highway from PM 12.3 to 15.2 and is a six-lane divided conventional highway from PM 15.2 to 15.9. It provides access to businesses and residences along the roadway. The posted speed limit is 35 miles per hour (mph). Traffic congestion in the AM and PM peak hours show some queuing along the project limits but most intersections operate at a level of service of C or better. *Plan Bay Area 2040*, the region's RTP/SCS, guides transportation and housing development within the project limits, and the cities of San Mateo, Burlingame, and Millbrae, and the Town of Hillsborough have Climate Action Plans that address GHGs within the project limits.

A GHG emissions inventory estimates the amount of GHGs discharged into the atmosphere by specific sources over a period of time, such as a calendar year. Tracking annual GHG emissions allows countries, states, and smaller jurisdictions to understand how emissions are changing and what actions may be needed to attain emission reduction goals. U.S. EPA is responsible for documenting GHG emissions nationwide, and the ARB does so for the state, as required by H&SC Section 39607.4.

4.5.2.1 National GHG Inventory

The U.S. EPA prepares a national GHG inventory every year and submits it to the United Nations in accordance with the Framework Convention on Climate Change. The inventory provides a comprehensive accounting of all human-produced sources of GHGs in the United States, reporting emissions of CO₂, CH₄, N₂O, HFCs, perfluorocarbons, SF₆, and nitrogen trifluoride. It also accounts for emissions of CO₂ that are removed from the atmosphere by "sinks" such as forests, vegetation, and soils that uptake and store CO₂ (carbon sequestration). As shown on Figure 4.5-1, the 1990 2019 inventory found that overall GHG emissions were 6,558 million metric tons (MMT) in 2019, down 1.7 percent from 2018 but up 1.8% from 1990 levels. Of these, 80 percent were CO₂, 10 percent were CH₄, and 7 percent were N₂O; the balance consisted of fluorinated gases. CO₂ emissions in 2019 were 2.2 percent less than in 2018, but 2.8 percent more than in 1990, and accounted for 74.1 percent of total GHG emissions. The transportation sector accounted for 29 percent of U.S. GHG emissions in 2019; fossil fuel

combustion from transportation accounted for about 35 percent of total CO2 emissions (U.S. EPA 2021).

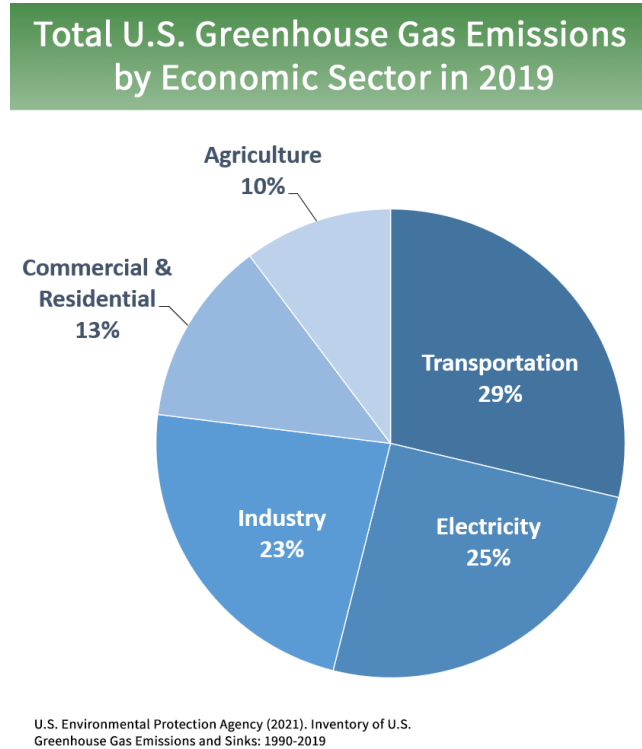


Figure 4.5-1: U.S. 2019 Greenhouse Gas Emissions (Source: U.S. EPA 2021)

4.5.2.2 State GHG Inventory

ARB collects GHG emissions data for transportation, electricity, commercial/residential, industrial, agricultural, and waste management sectors each year. It then summarizes and highlights major annual changes and trends to demonstrate the state’s progress in meeting its GHG reduction goals. The 2020 edition of the GHG emissions inventory reported emissions trends from 2000 to 2018. It found total California emissions were 425.3 MMTCO₂e in 2018, 0.8 MMTCO₂e higher than 2017 but 6 MMTCO₂e lower than the statewide 2020 limit of 431 MMT CO₂e. The transportation sector was responsible for 41 percent of total GHGs (Figure 4.5-2). Transportation emissions decreased in 2018 compared to the previous year, which is the first year over year decrease since 2013. Overall statewide GHG emissions declined from 2000 to 2018 despite growth in population and state economic output (Figure 4.5-3) (ARB 2020).

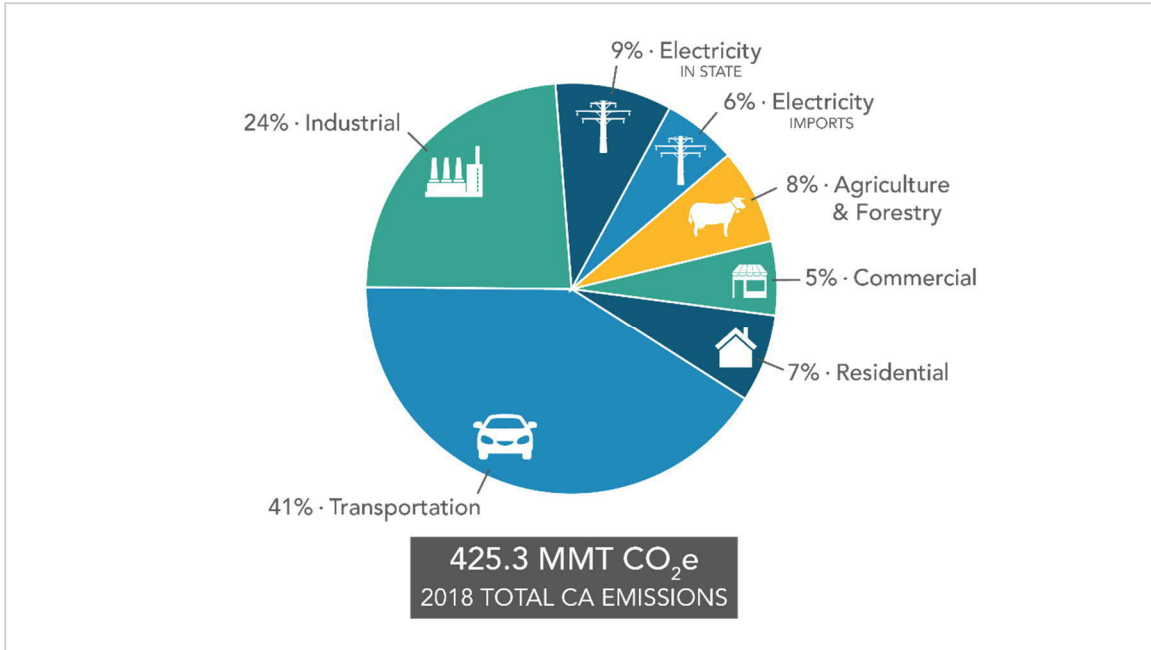


Figure 4.5-2: California 2018 Greenhouse Gas Emissions by Economic Sector (Source: ARB 2020)

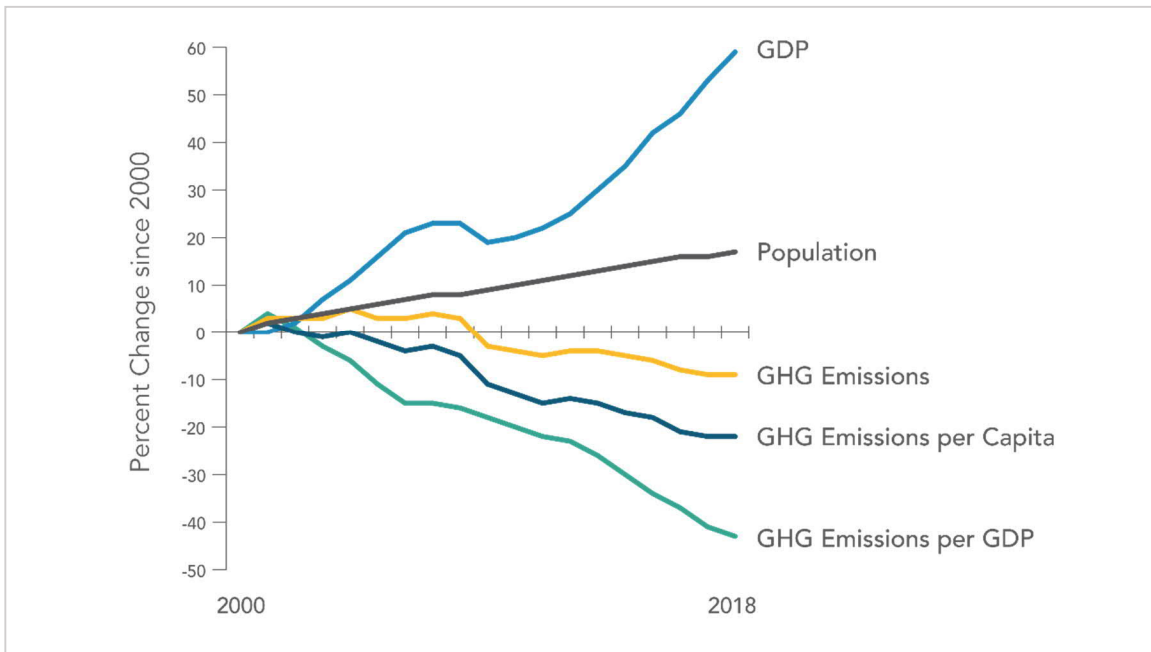


Figure 4.5-3. Change in California GDP, Population, and GHG Emissions since 2000 (Source: ARB 2020)

AB 32 required ARB to develop a Scoping Plan that describes the approach California will take to achieve the goal of reducing GHG emissions to 1990 levels by 2020, and to update it every 5 years. ARB adopted the first scoping plan in 2008. The second updated plan, California’s 2017 Climate Change Scoping Plan, adopted on December 14, 2017, reflects the 2030 target

established in EO B-30-15 and SB 32. The AB 32 Scoping Plan and the subsequent updates contain the main strategies California will use to reduce GHG emissions. Regional and Local Plans

ARB sets regional targets for California's 18 MPOs to use in their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to plan future projects that will cumulatively achieve GHG reduction goals. Targets are set at a percent reduction of passenger vehicle GHG emissions per person from 2005 levels. The proposed project is included in *Plan Bay Area 2040*, the RTP/SCS for the nine-county Bay Area region. The regional reduction targets for MTC/ABAG are 10 percent in 2020 and 19 percent in 2035 (ARB 2019c).

The proposed project is within the jurisdiction of *Plan Bay Area 2040*, which is the region's RTP/SCS from MTC. The Plan promotes many goals to create a more sustainable Bay Area including reducing per-capita carbon dioxide. In addition, the cities of San Mateo, Burlingame, and Millbrae, and the Town of Hillsborough have Climate Action Plans that address GHGs within the project limits. The City of Burlingame has a goal of reducing GHGs 40 percent below 2005 levels by 2030 (Burlingame 2019b). The City of San Mateo has a goal of reducing GHGs by 2,330 MTCO_{2e} by 2030 (San Mateo 2020c). The Town of Hillsborough has a goal of reducing GHGs 2,531 MTCO_{2e} by 2020 (Hillsborough 2010). The City of Millbrae has a goal of reducing GHGs 49 percent by 2030 (Millbrae 2020b).

The Build Alternative includes upgrades to the pedestrian infrastructure within the project limits that would promote walking. This would help decrease the Bay Area's per-capita carbon dioxide production.

4.5.3 Project Analysis

GHG emissions from transportation projects can be divided into those produced during operation of the SHS and those produced during construction. The primary GHGs produced by the transportation sector are CO₂, CH₄, N₂O, and HFCs. CO₂ emissions are a product of the combustion of petroleum-based products, like gasoline, in internal combustion engines. Relatively small amounts of CH₄ and N₂O are emitted during fuel combustion. In addition, a small amount of HFC emissions are included in the transportation sector.

The CEQA Guidelines generally address greenhouse gas emissions as a cumulative impact due to the global nature of climate change (Pub. Resources Code, § 21083(b)(2)). As the California Supreme Court explained, "because of the global scale of climate change, any one project's contribution is unlikely to be significant by itself." (Cleveland National Forest Foundation v. San Diego Assn. of Governments (2017) 3 Cal.5th 497, 512.) In assessing cumulative impacts, it must be determined if a project's incremental effect is "cumulatively considerable" (CEQA Guidelines Sections 15064(h)(1) and 15130).

To make this determination, the incremental impacts of the project must be compared with the effects of past, current, and probable future projects. Although climate change is ultimately a cumulative impact, not every individual project that emits greenhouse gases must necessarily be found to contribute to a significant cumulative impact on the environment.

4.5.3.1 Operational Emissions

The purpose of the project is to preserve and extend the life of the roadway and improve ride quality; improve drainage efficiency; enhance pedestrian access by upgrading infrastructure and bringing it into compliance with Title II of the Americans with Disabilities Act; and enhance user visibility and safety. This project would not increase the vehicle capacity of the roadway. This type of project generally causes minimal or no increase in operational GHG emissions. Because the project would not increase the number of travel lanes on El Camino Real, no increase in vehicle miles traveled would occur as result of the Build Alternative (either with or without inclusion of the design option). While some GHG emissions during the construction period would be unavoidable, no increase in operational GHG emissions is expected.

4.5.3.2 Construction Emissions

Construction GHG emissions would result from material processing, on-site construction equipment, and traffic delays due to construction. These emissions would be produced at different levels throughout the construction phase; their frequency and occurrence can be reduced through innovations in plans and specifications and by implementing better traffic management during construction phases.

In addition, with innovations such as longer pavement lives, improved traffic management plans, and changes in materials, the GHG emissions produced during construction can be offset to some degree by longer intervals between maintenance and rehabilitation activities.

The construction related GHG emissions were calculated using the Road Construction Emissions Model (RCEM), version 9.0.0, provided by the Sacramento Metropolitan Air Quality Management District. The total project construction duration is 36 months. The total amount of CO₂ produced due to construction would be 1,343.81 tons. The total amount of CH₄ produced would be 0.35 tons and the total N₂O produced would be 0.04 tons. Altogether, project construction would result in 1,236.01 tons of CO₂ equivalent (Caltrans 2020e).

All construction contracts include Caltrans Standard Specifications Section 7-1.02A and 7 1.02C, Emissions Reduction, require contractors to comply with all laws applicable to the project and to certify they are aware of and will comply with all ARB emission reduction regulations, and Section 14-9.02, Air Pollution Control, which requires contractors to comply with all air pollution control rules, regulations, ordinances, and statutes. Certain common regulations, such as equipment idling restrictions, that reduce construction vehicle emissions also help reduce GHG emissions.

4.5.3.3 CEQA Conclusion

While the project would result in GHG emissions during construction, it is anticipated that the project would not result in any increase in operational GHG emissions. The proposed project does not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. With implementation of construction BMPs and GHG-reduction measures (see Sections 2.1.1.3 and 4.5.4.2), the impact would be less than significant.

Caltrans is firmly committed to implementing measures to help reduce GHG emissions. These measures are outlined in the following section.

4.5.4 Greenhouse Gas Reduction Strategies

4.5.4.1 Statewide Efforts

Major sectors of the California economy, including transportation, will need to reduce emissions to meet the 2030 and 2050 GHG emissions targets. Former Governor Edmund G. Brown promoted GHG reduction goals that involved (1) reducing today’s petroleum use in cars and trucks by up to 50 percent; (2) increasing from one-third to 50 percent our electricity derived from renewable sources; (3) doubling the energy efficiency savings achieved at existing buildings and making heating fuels cleaner; (4) reducing the release of methane, black carbon, and other short-lived climate pollutants; (5) managing farms and rangelands, forests, and wetlands so they can store carbon; and (6) periodically updating the state's climate adaptation strategy, *Safeguarding California* (Figure 4.5-4).

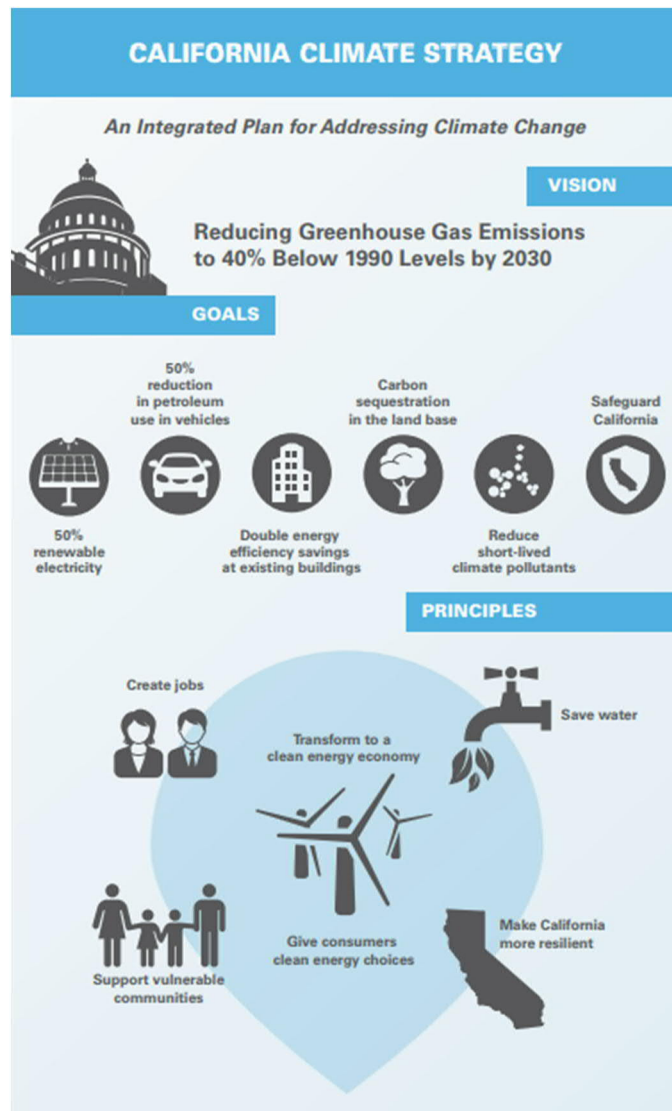


Figure 4.5-4: California Climate Strategy

The transportation sector is integral to the people and economy of California. To achieve GHG emission reduction goals, it is vital that the state build on past successes in reducing criteria and toxic air pollutants from transportation and goods movement. GHG emission reductions will come from cleaner vehicle technologies, lower-carbon fuels, and reduction of vehicle miles traveled (VMT). A key state goal for reducing GHG emissions is to reduce today's petroleum use in cars and trucks by up to 50 percent by 2030 (State of California 2019).

In addition, SB 1386 (Wolk 2016) established as state policy the protection and management of natural and working lands and requires state agencies to consider that policy in their own decision making. Trees and vegetation on forests, rangelands, farms, and wetlands remove carbon dioxide from the atmosphere through biological processes and sequester the carbon in above- and below-ground matter.

Subsequently, Governor Gavin Newsom issued Executive Order N-82-20 to combat the crises in climate change and biodiversity. It includes instruction to state agencies to use existing authorities and resources to identify and implement near- and long-term actions to accelerate natural removal of carbon and build climate resilience in our forests, wetlands, urban greenspaces, agricultural soils, and land conservation activities in ways that serve all communities and in particular low-income, disadvantaged and vulnerable communities. Each agency is to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the State's carbon neutrality goal and build climate resilience.

4.5.4.2 Caltrans Activities

Caltrans continues to be involved on the Governor's Climate Action Team as the ARB works to implement EOs S-3-05 and S-01-07 and help achieve the targets set forth in AB 32. EO B-30-15, issued in April 2015, and SB 32 (2016), set an interim target to cut GHG emissions to 40 percent below 1990 levels by 2030. The following major initiatives are underway at Caltrans to help meet these targets.

California Transportation Plan (CTP 2040)

The California Transportation Plan (CTP) is a statewide, long-range transportation plan to meet our future mobility needs and reduce GHG emissions. It serves as an umbrella document for all the other statewide transportation planning documents. The CTP 2050 presents a vision of a safe, resilient, and universally accessible transportation system that supports vibrant communities, advances racial and economic justice, and improves public and environmental health. The plan's climate goal is to achieve statewide GHG emissions reduction targets and increase resilience to climate change. It demonstrates how GHG emissions from the transportation sector can be reduced through advancements in clean fuel technologies; continued shifts toward active travel, transit, and shared mobility; more efficient land use and development practices; and continued shifts to telework (Caltrans 2021).

SB 391 (Liu 2009) requires the CTP to meet California's climate change goals under AB 32. Accordingly, the CTP 2040 identifies the statewide transportation system needed to achieve maximum feasible GHG emission reductions while meeting the state's transportation needs. While MPOs have primary responsibility for identifying land use patterns to help reduce GHG emissions, CTP 2040 identifies additional strategies in Pricing, Transportation Alternatives, Mode Shift, and Operational Efficiency.

Caltrans' Strategic Management Plan

The Caltrans Strategic Management Plan 2020–24 includes goals of stewardship, climate action, and equity. Climate action strategies include developing and implementing a Caltrans Climate Action Plan; a robust program of climate action education, training, and outreach; partnership and collaboration; a VMT monitoring and reduction program; and engaging with the most vulnerable communities in developing and implementing Caltrans climate action activities.

Funding and Technical Assistance Programs

In addition to developing plans and performance targets to reduce GHG emissions, Caltrans also administers several sustainable transportation planning grants. These grants encourage local and regional multimodal transportation, housing, and land use planning that furthers the region's RTP/SCS; contribute to the state's GHG reduction targets and advance transportation-related GHG emission reduction project types/strategies; and support other climate adaptation goals (e.g., *Safeguarding California*).

Caltrans Policy Directives and Other Initiatives

Caltrans Director's Policy 30 (DP-30) Climate Change (June 22, 2012) is intended to establish a Department policy that will ensure coordinated efforts to incorporate climate change into Departmental decisions and activities. *Caltrans Activities to Address Climate Change* (April 2013) provides a comprehensive overview of Caltrans' statewide activities to reduce GHG emissions resulting from agency operations.

4.5.4.3 Project-Level GHG Reduction Strategies

The following measures will also be implemented in the proposed project to reduce GHG emissions and potential climate change impacts from the proposed project (described in Section 2.1.1.3) would reduce GHG emissions during construction:

- The Transportation Management Plan will minimize traffic delays and reduce idling emissions.
- Caltrans 2018 Standard Specifications Section 7-1.02C, Emissions Reduction, and Section 14-9.02, Air Pollution Control will reduce emissions from construction equipment.
- The following measures will minimize GHG emissions during construction.
 - Regular vehicle and equipment maintenance to minimize emissions.
 - Recycle non-hazardous waste and excess materials, onsite where possible, to reduce transportation to offsite disposal.

In addition, VIS-2 would require replanting removed trees at a 1:1 ratio (see Appendix F). These replanted trees will help to absorb CO₂ and also restore tree canopy which increases shade.

During final design, the following minimization measures will be evaluated for inclusion in the project:

- Reduce construction waste through re-use or recycling of construction and demolition waste.
- On-site recycling of existing project features.
- Use of long-life pavement.
- Group construction activities and lengthen lane closure durations to reduce necessary mobilization efforts.

The BAAQMD Clean Air Plan (2017) proposed a multi-pollutant approach control strategy to reduce emissions of particulate matter, TACs, ozone precursors, and greenhouse gases. The control measures are categorized based upon the economic sector framework used by the ARB. The transportation sector includes five control measures, with the first measure being the reduction of motor vehicle travel by promoting transit, bicycling, walking and ridesharing. This control measure is supported by the Build Alternative since the project would substantially upgrade pedestrian infrastructure within the project limits including sidewalks, curb ramps, APS/CPS signals, high-visibility crosswalk striping and implementation of pedestrian hybrid beacons in select locations. The other four control measures included in the transportation sector (implement pricing measures to reduce travel demand; direct new development to areas that are well served by transit, and conducive to bicycling and walking; accelerate the widespread adoption of electric vehicles; and promote the use of clean fuels and low- or zero carbon technologies in trucks and heavy-duty equipment) are not project-level and therefore do not apply to the proposed project.

4.5.5 Adaptation

Reducing GHG emissions is only one part of an approach to addressing climate change. Caltrans must plan for the effects of climate change on the state's transportation infrastructure and strengthen or protect the facilities from damage. Climate change is expected to produce increased variability in precipitation, rising temperatures, rising sea levels, variability in storm surges and their intensity, and in the frequency and intensity of wildfires. Flooding and erosion can damage or wash out roads; longer periods of intense heat can buckle pavement and railroad tracks; storm surges combined with a rising sea level can inundate highways. Wildfire can directly burn facilities and indirectly cause damage when rain falls on denuded slopes that landslide after a fire. Effects will vary by location and may, in the most extreme cases, require that a facility be relocated or redesigned. Accordingly, Caltrans must consider these types of climate stressors in how highways are planned, designed, built, operated, and maintained.

4.5.5.1 Federal Efforts

Under NEPA assignment, Caltrans is obligated to comply with all applicable federal environmental laws and FHWA NEPA regulations, policies, and guidance.

The U.S. Global Change Research Program (USGCRP) delivers a report to Congress and the president every 4 years, in accordance with the Global Change Research Act of 1990 (15 U.S.C. [ch. 56A § 2921 et seq.](#)). *The Fourth National Climate Assessment*, published in 2018, presents the foundational science and the “human welfare, societal, and environmental elements of climate change and variability for 10 regions and 18 national topics, with particular attention paid to

observed and projected risks, impacts, consideration of risk reduction, and implications under different mitigation pathways.” Chapter 12, “Transportation,” presents a key discussion of vulnerability assessments. It notes that “asset owners and operators have increasingly conducted more focused studies of particular assets that consider multiple climate hazards and scenarios in the context of asset-specific information, such as design lifetime” (USGCRP 2018).

The U.S. DOT Policy Statement on Climate Adaptation in June 2011 committed the federal Department of Transportation to “integrate consideration of climate change impacts and adaptation into the planning, operations, policies, and programs of DOT in order to ensure that taxpayer resources are invested wisely, and that transportation infrastructure, services and operations remain effective in current and future climate conditions” (U.S. DOT 2011).

FHWA order 5520 (*Transportation System Preparedness and Resilience to Climate Change and Extreme Weather Events*, December 15, 2014) established FHWA policy to strive to identify the risks of climate change and extreme weather events to current and planned transportation systems. FHWA has developed guidance and tools for transportation planning that foster resilience to climate effects and sustainability at the federal, state, and local levels (FHWA 2019).

4.5.5.2 State Efforts

Climate change adaptation for transportation infrastructure involves long-term planning and risk management to address vulnerabilities in the transportation system. *California’s Fourth Climate Change Assessment* (2018) is the state’s effort to “translate the state of climate science into useful information for action” in a variety of sectors at both statewide and local scales. It adopts the following key terms used widely in climate change analysis and policy documents:

- *Adaptation* to climate change refers to adjustment in natural or human systems in response to actual or expected climatic stimuli or their effects, which moderates harm or exploits beneficial opportunities.
- *Adaptive capacity* is the “combination of the strengths, attributes, and resources available to an individual, community, society, or organization that can be used to prepare for and undertake actions to reduce adverse impacts, moderate harm, or exploit beneficial opportunities.”
- *Exposure* is the presence of people, infrastructure, natural systems, and economic, cultural, and social resources in areas that are subject to harm.
- *Resilience* is the “capacity of any entity – an individual, a community, an organization, or a natural system – to prepare for disruptions, to recover from shocks and stresses, and to adapt and grow from a disruptive experience”. Adaptation actions contribute to increasing resilience, which is a desired outcome or state of being.
- *Sensitivity* is the level to which a species, natural system, or community, government, etc., would be affected by changing climate conditions.
- *Vulnerability* is the “susceptibility to harm from exposure to stresses associated with environmental and social change and from the absence of capacity to adapt.” Vulnerability can increase because of physical (built and environmental), social, political,

and/or economic factor(s). These factors include, but are not limited to: ethnicity, class, sexual orientation and identification, national origin, and income inequality. Vulnerability is often defined as the combination of sensitivity and adaptive capacity as affected by the level of exposure to changing climate.

Several key state policies have guided climate change adaptation efforts to date. Recent state publications produced in response to these policies draw on these definitions.

EO S-13-08, issued by then-governor Arnold Schwarzenegger in November 2008, focused on sea-level rise and resulted in the *California Climate Adaptation Strategy* (2009), updated in 2014 as *Safeguarding California: Reducing Climate Risk* (Safeguarding California Plan). The Safeguarding California Plan offers policy principles and recommendations and continues to be revised and augmented with sector-specific adaptation strategies, ongoing actions, and next steps for agencies.

EO S-13-08 also led to the publication of a series of sea-level rise assessment reports and associated guidance and policies. These reports formed the foundation of an interim *State of California Sea-Level Rise Interim Guidance Document* (SLR Guidance) in 2010, with instructions for how state agencies could incorporate “sea-level rise (SLR) projections into planning and decision making for projects in California” in a consistent way across agencies. The guidance was revised and augmented in 2013. *Rising Seas in California – An Update on Sea-Level Rise Science* was published in 2017 and its updated projections of sea-level rise and new understanding of processes and potential impacts in California were incorporated into the *State of California Sea-Level Rise Guidance Update* in 2018.

EO B 30 15, signed in April 2015, requires state agencies to factor climate change into all planning and investment decisions. This EO recognizes that effects of climate change other than sea-level rise also threaten California’s infrastructure. At the direction of EO B-30-15, the Office of Planning and Research published *Planning and Investing for a Resilient California: A Guidebook for State Agencies* in 2017, to encourage a uniform and systematic approach. Representatives of Caltrans participated in the multi-agency, multidisciplinary technical advisory group that developed this guidance on how to integrate climate change into planning and investment.

AB 2800 (Quirk 2016) created the multidisciplinary Climate-Safe Infrastructure Working Group, which in 2018 released its report, *Paying it Forward: The Path Toward Climate-Safe Infrastructure in California*. The report provides guidance to agencies on how to address the challenges of assessing risk in the face of inherent uncertainties still posed by the best available science on climate change. It also examines how state agencies can use infrastructure planning, design, and implementation processes to address the observed and anticipated climate change impacts.

4.5.5.3 Caltrans Adaptation Efforts

Caltrans Vulnerability Assessments

Caltrans is conducting climate change vulnerability assessments to identify segments of the State Highway System vulnerable to climate change effects including precipitation, temperature, wildfire, storm surge, and sea-level rise. The approach to the vulnerability assessments was

tailored to the practices of a transportation agency, and involves the following concepts and actions:

- *Exposure* – Identify Caltrans assets exposed to damage or reduced service life from expected future conditions.
- *Consequence* – Determine what might occur to system assets in terms of loss of use or costs of repair.
- *Prioritization* – Develop a method for making capital programming decisions to address identified risks, including considerations of system use and/or timing of expected exposure.

The climate change data in the assessments were developed in coordination with climate change scientists and experts at federal, state, and regional organizations at the forefront of climate science. The findings of the vulnerability assessments will guide analysis of at-risk assets and development of adaptation plans to reduce the likelihood of damage to the State Highway System, allowing Caltrans to both reduce the costs of storm damage and to provide and maintain transportation that meets the needs of all Californians.

4.5.5.4 Project Adaptation Analysis

The January 2018 *Caltrans Climate Change Vulnerability Assessments* for District 4 (Caltrans 2018), which covers the nine-county San Francisco Bay Area, was consulted regarding climate stressors in the project limits. The report and accompanying Climate Change Vulnerability Assessment map tool (Caltrans 2017b) identified the following climate change conditions for the project limits for the analysis years 2025, 2055, and 2085.

Sea Level Rise

The project is outside the coastal zone and not in an area subject to sea-level rise. Extreme projections for sea level rise in the San Francisco Bay are 1 to 3 feet of sea level rise by 2050, beyond the design life of the project. Adapting to Rising Tides estimates that with a 3 foot increase in sea level rise in combination with a 100-year king tide storm surge, sea levels would reach west of US 101 but would not reach El Camino Real within the project limits (AdaptingtoRisingTides.org 2021). Accordingly, direct impacts to transportation facilities due to projected sea-level rise are not expected.

Floodplains

According to the Climate Change Vulnerability Assessment map tool, the 100-year precipitation depth for El Camino Real in the project limits is anticipated to increase by approximately 4.0 percent by 2025, another 3.9 percent by 2055, and another 5.3 percent by 2085 (Caltrans 2017b). El Camino Real within the project limits is within the FEMA-delineated floodplains, as described in Section 3.2.1.2. The Build Alternative (either with or without inclusion of the design option) does not include any new structures within the waterways that cross under or near El Camino Real. In addition, the Build Alternative (either with or without inclusion of the design option) includes upgrades to the existing drainage system to move water off of the roadway more efficiently, thereby reducing damage from localized flooding.

Climate change risk analysis involves uncertainties about the timing and intensity of potential risks. Detailed engineering analyses would be required to determine if proposed drainage facilities would accommodate climate change-related increases in rainfall intensity. Detailed drainage design is conducted during the PS&E phase. At that time, projected precipitation changes would be considered, and adaptive measures would be implemented if needed based on guidance from Caltrans Hydraulics.

The project is not anticipated to exacerbate the effects of climate change in terms of precipitation depth.

Wildfire

El Camino Real in the project limits is not identified as an area subject to increased wildfire risk for the analysis years 2025, 2055, or 2085 (Caltrans 2017b, Caltrans 2018).

Chapter 5 Comments and Coordination

Early and continuing coordination with the general public and public agencies is an essential part of the environmental process. It helps planners determine the necessary scope of environmental documentation and the level of analysis required, and to identify potential impacts and avoidance, minimization, and/or mitigation measures and related environmental requirements. Agency and tribal consultation and public participation for this project have been accomplished through a variety of formal and informal methods, including interagency coordination meetings, public meetings, public notices, PDT meetings, and stakeholder meetings. This chapter summarizes the results of Caltrans' efforts to fully identify, address, and resolve project-related issues through early and continuing coordination.

5.1 Coordination Plan

23 USC 139 requires lead agencies to establish a plan and schedule for coordinating public and federal agency participation and comment during the environmental review process. The Caltrans Standard Environmental Reference, along with NEPA and CEQA provide a set of steps to coordinate public participation (see Sections 5.2 and 5.3). As shown in Table 2.1.5-1, no federal agencies are required to provide approvals for this project. Therefore, no coordination plan was circulated for this project.

5.2 Scoping Process

Scoping is the process by which the lead agency (Caltrans) determines the scope of issues to be addressed, examines the proposed action early, and identifies pertinent issues and feasible alternatives or mitigation measures to avoid potentially significant environmental effects. Scoping is intended to be a collaborative process between the lead agency, federal, state, and local public agencies, tribal entities, and members of the public.

In compliance with CEQA, a Notice of Preparation (NOP) for an Environmental Impact Report was filed with the State Clearinghouse on May 22, 2020. In compliance with NEPA, a Notice of Intent (NOI) to prepare an Environmental Impact Statement was published in the Federal Register on December 9, 2020. The NOP and NOI are included in Appendix C. As described below, three public meetings have been held for this project prior to public circulation of this EIR/EIS. The first meeting was a public education meeting and was not a scoping meeting. The second meeting was a scoping meeting pursuant to CEQA. The third meeting was a scoping meeting pursuant to NEPA. The second and third meetings were held during the COVID-19 pandemic and were therefore virtual instead of in-person meetings.

5.2.1 Educational Open House Meeting

Caltrans held an in-person educational public open house meeting on January 28, 2020, which was attended by more than 175 members of the public. This meeting included a live, gallery-style exhibit of educational materials that informed attendees of the project status and next steps. Outreach for the open house included the following: E-Blasts were sent via Burlingame Newsletter on January 16 and 23, 2020, to over 6,000 residents of the City of Burlingame and the surrounding area; 6- by 11-inch postcard mailers were sent to approximately 12,000 residents within a 5-block radius of the project limits; an email was sent to all local elected officials; and a

Caltrans Media Advisory was distributed on January 23, 2020 to the District 4 Core Media List (a total of 41 media outlets). Additionally, multiple attendees stated that they learned of the event through their neighbors on NextDoor. Attendees received a 4-page project fact sheet, exhibit map, and comment card with mail-in option.

5.2.2 CEQA Scoping Meeting/Period

A CEQA scoping period was observed from May 26 to July 6, 2020, following the filing of the NOP with the State Clearinghouse. Due to the COVID-19 pandemic and associated stay-at-home orders, Caltrans requested an extension of the scoping period to 45 days. Caltrans also launched an interactive website (at ECRscoping.com) to provide content and a video presentation, in lieu of an in-person meeting. The website gave the public the opportunity to submit comments for the entire scoping 45-day period. Caltrans sent approximately 15,000 postcard invitations to participate in the scoping process to the communities and stakeholders potentially affected by the project. Caltrans also posted notice of the scoping period on the project webpage at www.ElCaminoRealProject.com.

The scoping website provided a video presentation by project team members, a poster gallery, a frequently asked questions page, and an online comment submission form. The website was ADA-compliant and featured multilingual support through an embedded Google Translate application. Postcard notices to residents included Spanish and Simplified Chinese language, instructing readers to contact the Caltrans Public Information Officer to request additional translations services, as needed. Caltrans provided the opportunity to request translations for all scoping materials, as well as support for offline options, such as a DVD of the video for those without a computer or internet. There were 950 visitors to the website and 131 comments were submitted.

5.2.3 NEPA Scoping Meeting/Period

A NEPA scoping period was observed from November 16, 2020 to January 8, 2021, following the publication of the Notice of Intent (NOI) in the Federal Register. Additional time was applied to the NEPA scoping period due to COVID-related delays with publishing the NOI in the Federal Register, thus extending the public comment period to 30 days after publication of the NOI. The NEPA scoping period paralleled the CEQA scoping period in substance. A website (www.ECRalternatives.com) was used to provide public information regarding the project in support of the NOI, including presentations on cultural resources and visual resources in the project area, the alternatives analysis process, and the alternatives being considered. Throughout the NOI scoping period, the public had the opportunity to submit comments on the project using an online submission form, via email, or U.S. mail. In addition, the public could post comments in an online public forum and others could “thumbs up” or “thumbs down” posted comments to indicate agreement or disagreement. The NEPA scoping period included the same notices to stakeholders and residents as described in Section 5.2.2. There were 880 visitors to the website. They were able to submit comments via a comment function and an online public forum. Seventy-six comments were received during the NEPA scoping period.

5.2.4 Comments Received Prior to and During Scoping

A total of 71 comments were received from attendees of the educational open house. Common sentiments included concern regarding roadway visibility, safety, undergrounding of utilities, flooding, and trees in the project limits. Comments included concerns about project-related loss of both historic trees and non-historic trees. Additionally, multiple comments were received expressing the need to consider bicycle facilities when designing the project.

One-hundred thirty-one comments were received during the CEQA scoping period. Commenters expressed similar sentiments to comments received during and after the open house, including concern regarding trees, pedestrian safety, and flooding. Multiple commenters expressed concerns that the trees along El Camino Real within the project limits are an important resource to the City of Burlingame and the corridor, and that mature trees should be planted to replace trees removed.

Seventy-five comments were received via post mail, email, and on the website through the comment card function during the NEPA scoping period. In addition, 159 comments were submitted in the online public forum. Common sentiments included pedestrian, bicyclist, and motorist safety; tree replacement; utilities and undergrounding; and lane configuration on El Camino Real. Comments regarding the eucalyptus trees on El Camino Real varied, with some expressing strong support for maintaining the existing canopy. Many commenters expressed concern regarding the existing condition of the trees, tree debris, and associations with fire hazard and fallen-object hazards.

The most frequent sentiments submitted during the public meetings are summarized in Table 5.2-1. The table also includes the location within the EIR/EIS where commenters can see each topic addressed in more detail. All comments received have been reviewed by the PDT for consideration in the environmental analysis and design of the project where feasible.

Table 5.2-1: Common Comments Prior to and During Scoping

Comment Topic/Theme	Summary of Comment Theme	EIR/EIS Section
Traffic Safety	Vehicle and motorists' safety along El Camino Real are a frequent concern in many of the comments received. Traffic safety include visibility concerns, surface conditions, turning on and off El Camino Real, and the safety of a shared roadway with bicyclists.	Section 2.1
Pedestrian Safety	Pedestrian safety on the sidewalks of El Camino Real and the crosswalks is a predominant concern for many commenters. Pedestrian safety on the sidewalks include irregular sidewalk surfaces, cracks, missing pieces of the sidewalk/gaps in the sidewalk, as well as the proximity of the sidewalk (without a buffer) to the traffic along El Camino Real. Pedestrian safety using crosswalks is also of concern, due to short crosswalk countdown times, traffic turning into pedestrians while crossing, and the history of pedestrian accidents with traffic on El Camino Real.	Section 2.1
Existing Tree Preservation	Preserving all the trees along El Camino Real, or at least preserving as many as possible through creative design, was a predominant comment received. The desire for the preservation of the trees, including the historical eucalyptus trees, along El Camino Real to retain the current aesthetic of the roadway, nostalgic scenery, and historic resource.	Sections 3.1.5 and 3.1.6
Undergrounding Utilities	Undergrounding of utility lines along El Camino Real was a reoccurring desire and request in the comments; both a means to create a more pleasing visual aesthetic, as well as to allow for new trees to grow tall along El Camino Real without having to trim them for the utility lines.	Sections 2.1.1.1 and 3.1.4
Replacement trees and maintenance	Many of the comments received recognized that the old eucalyptus trees along El Camino Real have caused many of the existing problems on El Camino Real and acknowledge that some of the trees should be removed in order to correct the issues. Also, expressed were concerns that the trees to be removed should be replaced with more appropriate trees that will grow quickly to replace the lost canopy and its aesthetic feel. There were many comments on this topic stating the importance of having evergreen trees, planting more mature trees rather than saplings, and providing committed/continuous maintenance for the longevity of the replacement trees.	Sections 2.1.1.2 and 3.1.5
Multimodal Transportation Accommodation (bikes, buses, etc.)	The topic of multimodal transportation accommodation includes all comments regarding accommodation for bicyclists' safety, bike lanes, designated bus lanes, bus shelters, public transportation improvements, and pedestrian improvements along El Camino Real.	Sections 2.1, 2.1.4, and 3.1.1
Flooding and Drainage	Poor drainage issues and flooding along El Camino Real was a reoccurring theme among the public comments. The issues expressed on this topic included long standing stormwater, roadway flooding; and residents along El Camino Real having to regularly use sandbags to protect their property during storm events.	Sections 2.1, 3.2.1, and 3.2.2
Project construction concern and questions	Questions and concerns regarding the project timeline and schedule were a reoccurring theme among public comments. The project concerns included construction timing, construction noise, and the cumulative impact of the El Camino Real construction with other projects in the vicinity.	Sections 2.1.1.2 and 3.4

5.3 Consultation and Coordination with Public Agencies, Tribal Entities, and Stakeholders

5.3.1 Federal Agencies

Under 23 USC 139, Efficient Environmental Review Process, Caltrans as the lead agency under NEPA is required to invite all federal, state, tribal, regional, and local government agencies that may have an interest in the project to be participating agencies. The PDT identified only one federal agency with a potential interest in the project. The ACHP has the role of commenting on projects with the potential to have an adverse effect to cultural resources, under the NHPA.

Caltrans along with FHWA, SHPO, and ACHP have signed a programmatic agreement for the implementation of Section 106 of the NHPA as it pertains to the administration of the federal-aid highway program in California. This programmatic agreement, effective January 1, 2014 stipulates the process for these agencies to participate in projects. This programmatic agreement provides a process for ACHP to comment on this project through the Section 106 process. Therefore, ACHP is not a participating agency for this project. SHPO is a state agency and coordination with the SHPO is discussed in Section 5.3.3.

U.S. EPA has provided written comments pursuant to NEPA, Council on Environmental Quality regulations (40 CFR Parts 1500 – 1508) and Section 309 of the Clean Air Act. In a January 7, 2021 memorandum, U.S. EPA recommended elements to be included in the EIR/EIS. While some of the suggested elements are not required as part of this project, Section 4.5 incorporates information requested by U.S. EPA.

5.3.2 Tribal Entities

The NAHC was contacted on July 25, 2019 to request a search of the Sacred Lands File for cultural resources of significance to Native Americans within or near the APE.

The NAHC responded on July 30, 2019 reporting negative search results. The NAHC provided a list of Native American parties and individuals with potential interest in the project and their contact information. Letters providing project information and requesting input were sent to each individual and organization on the list on August 1, 2019. Follow-up calls were conducted on November 6, 2019, and the following is a summary of the responses from the calls:

- Ms. Irenne Zwierlein of the Amah Mutsun Tribal Band of Mission San Juan Bautista expressed interest in providing monitoring services should any further archaeological work be conducted for this project.
- Ms. Ann Marie Sayers of the Indian Canyon Mutsun Band of Costanoan recommended that archaeological and Native American monitors be present for any ground disturbing work and would like to be kept informed of studies and scheduling.
- Mr. Andrew Galvan of the Ohlone Indian Tribe identified the project area as one of high cultural sensitivity and recommended monitoring of ground-disturbing activities.

All the above individuals were provided with information regarding a public information meeting on December 11, 2019. Those individuals on the NAHC list who have not responded were emailed information about the meeting. No other responses were received.

Letters were sent via email to all interested Native Americans on April 15, 2021 updating them on the proposed Finding of Adverse Effect for the project. No responses were received.

Tribal consultation with Caltrans is ongoing.

5.3.3 State Agencies

Consultation with the SHPO was initiated on March 11, 2020, with an in-person meeting with Natalie Lindquist and Lucinda Woodward of the California Office of Historic Preservation (OHP) and the following Caltrans staff: Frances Schierenbeck, Senior Environmental Planner, Caltrans District 4 Office of Cultural Resources Studies (OCRS); Christopher Caputo, Office Chief, OCRS; and David Price, Section 106 Coordinator, Caltrans Cultural Studies Office (CSO) - Sacramento. Caltrans sent the results of cultural resource studies to the SHPO on August 4, 2020, for concurrence on property eligibility for the NRHP; no response was received. Because 30 days for comment had passed, per stipulation VIII.C.6a of the January 2014 PA, on October 15, 2020, Caltrans sent the SHPO a Notice of Moving Forward without SHPO concurrence on its Determination of Eligibility for the SM 82 ADA and Rehabilitation Improvements Project (EA 0K810, EFIS 046000142). Caltrans sent the SHPO the Finding of Adverse Effect (FAE) on September 10, 2021 and received concurrence on the finding on November 18, 2021. Caltrans consulted with the SHPO to develop the Memorandum of Agreement (MOA), which was executed on February 17, 2022.

5.3.4 Stakeholder Engagement

Caltrans has conducted stakeholder outreach with the following stakeholders:

- City of Burlingame – September 24, 2019; November 20, 2019; January 9, 2020; April 27, 2020; May 19, 2020; and October 30, 2020
- City of Millbrae – January 28, 2020
- City of San Mateo – November 20, 2019
- El Camino Real Task Force – September 24, 2019
- San Mateo Unified School District – November 20, 2019
- Burlingame Citizens Environmental Council – November 20, 2019
- Burlingame High School Parents Group – November 20, 2019
- Burlingame School District PTA Council – November 20, 2019

Additionally, Caltrans conducted public participation and interested parties outreach for project cultural resources (Section 3.1.6). Caltrans identified potential local interested parties and sent notification letters to the following organizations:

- Burlingame Historical Society (August 1, 2019)
- City of Burlingame Planning Department (August 1, 2019)

- City of Burlingame Planning Commission (September 9, 2019)
- Cultural Landscape Foundation (September 9, 2019)
- California Garden & Landscape History Society (September 9, 2019)
- Town of Hillsborough (August 1, 2019)
- City of San Mateo Planning Department (August 1, 2019)
- Millbrae Historical Society (January 8, 2020)
- San Mateo County Historical Society (August 1, 2019)

A summary of the responses received are below:

- The Cultural Landscape Foundation would like to review the draft environmental document for the project when it becomes available. During follow up contact the Cultural Landscape Foundation stated that they were no longer interested in reviewing the draft.
- The California Garden & Landscape History Society responded that the organization did not have any comment on the project.
- The City of San Mateo responded that the Saint Joseph Parish at 770 N. El Camino Real located within the APE for the project is an informal community landmark. The city expressed interest in being keep up to date on general project and cultural resource issues, consultation is ongoing.
- Jennifer Pfaff, President of the Burlingame Historical Society, initially responded in August 2019 and consultation is ongoing with the organization regarding the project. Ms. Pfaff has assisted with background research of the materials held within the Burlingame Historic Society archives.
- The Millbrae Historical Society responded with no concerns.

5.4 Circulation, Review, and Comment on the Draft EIR/EIS

Public input on the project was solicited during the review period for the Draft EIR/EIS, which lasted from June 10, 2021 to August 2, 2021. The public was notified of the availability of the Draft EIR/EIS by a number of methods, including postings on the Caltrans website, local newspapers, postcards, and an emailed announcement to interested agencies and individuals. During the review period, Caltrans held a virtual public hearing on Wednesday, July 14, 2021, and an in-person public hearing on Friday, July 16, 2021 to share information about the project and collect comments on the Draft EIR/EIS from interested parties. The review period and instructions for submitting comments were also included on the first page of the Draft EIR/EIS. All formal comments are addressed and responses published in this Final EIR/EIS as described below. Complete copies of all comments received during the public review period are included in Appendix I.

Also included below are two Master Responses that each address issues raised by numerous commenters. Master Response 1 addresses consideration of multimodal transportation facilities as part of the proposed project, and Master Response 2 addresses project effects on the Howard-Ralston Eucalyptus Tree Rows.

5.4.1 Master Responses

5.4.1.1 Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives

Several commenters stated that both the project and the Draft EIR/EIS are deficient because additional multimodal transportation facilities, such as bicycle lanes, a transit-only lane, and connections to other locally planned transportation projects, should have been included.

Public Resources Code Section 14526.5(a) requires the California Transportation Commission (CTC) to “prepare a state highway operation and protection program for the expenditure of transportation funds for major capital improvements that are necessary to preserve and protect the state highway system. Projects included in the program shall be limited to improvements relative to the maintenance, safety, operation, and rehabilitation of state highways and bridges that do not add a new car travel lane to the system.” This program is known as the State Highway Operation and Protection Program (SHOPP). Projects included in this program are based on the California Transportation Asset Management Plan (TAMP). The SHOPP is a “fix-it-first” program that funds the repair and preservation, emergency repairs, safety improvements, and some highway operational improvements on the State Highway System (SHS). The SHOPP also funds legally mandated project categories such as retrofitting existing SHS facilities to comply with the Americans with Disabilities Act (ADA) and storm water control requirements. The proposed project is eligible for implementation under the SHOPP Roadway Preservation, Section 201.120 Pavement Resurfacing/ Rehabilitation.

In accordance with the above, and as stated in Section 1.3 of this document, the Purpose and Need of this project is to correct roadway deficiencies and improve safety along the project corridor. Reconfiguring the roadway to incorporate additional multimodal transportation opportunities is outside the scope of the Purpose and Need of the project. Nevertheless, Caltrans evaluated this SHOPP-funded project in the context of the Caltrans Strategic Plan, which supports multimodal transportation uses.

With regard to the incorporation of local and regional planning efforts, as stated in Draft EIR/EIS Chapter 1, Introduction, the proposed project is included in the Metropolitan Transportation Commission’s (MTC’s) Bay Area Regional Transportation Plan (RTP), *Plan Bay Area 2040* (Association of Bay Area Governments [ABAG] and MTC 2017a, amended 2020; RTP ID No. 17-10-0025). The project is in the 2019 Transportation Improvement Program (TIP), as revised with Revision Number 2019-41, originally adopted by the MTC on September 28, 2018 and revised on December 11, 2020 (MTC 2018, MTC 2020; TIP ID No. VAR170006). The Federal Highway Administration (FHWA) originally approved the 2019 TIP on December 17, 2018.

The PDT considered removing a lane of traffic in each direction and found that it would cause severe congestion without counteracting the environmental impacts of the preferred alternative. The PDT also consulted with SamTrans, the transit service provider, regarding transit operations

along the corridor in January 2021. Caltrans learned that SamTrans is beginning a study in the corridor, the results of which would not be available for the Draft EIR/EIS or the Final EIR/EIS. However, when their results are available, SamTrans can discuss and propose improvements in the corridor in the State's public right of way. In the meantime, the project does not impact or reduce transit operations. The PDT also reviewed City of Burlingame's Bicycle Master Plan. The project does not conflict with this plan. The project also conforms with the Caltrans Strategic Plan by enhancing intersection crossings for bicyclists within the project limits. The roadway was not widened to avoid and minimize impacts to Historic Trees and a lane was not added to stay consistent with SHOPP funding requirements; however, the project does not preclude future identification of a transit only lane or bicycle lane(s).

Among the items brought forward for Caltrans' consideration during the community outreach meetings and workshops, was the potential for the project to include multimodal transportation improvements, such as bicycle lanes, transit lanes, and connectivity with locally planned transportation improvements. Caltrans carefully considered the suggestions made during the project planning phase and the concerns and suggestions raised in comments on the Draft EIR/EIS. There are several constraints associated with the 3.6-mile segment of SR 82 in San Mateo County that is the subject of the proposed pavement rehabilitation project. Both sides of SR 82 in the project area are fully developed with existing residential and commercial buildings. These buildings are vital components of the respective cities of San Mateo, Burlingame, and Millbrae. Acquisition of new right-of-way to accommodate multimodal improvements would require impacts to residential properties and businesses. Without acquisition of new right-of-way, the roadway cannot be changed in a manner that would provide for the addition of transit or bicycle lanes, while still allowing sufficient passage of vehicles and, at the same time, avoiding substantial increases to vehicular travel time (since this portion of SR 82 is a major travel thoroughfare).

As described in Chapter 5, Caltrans conducted numerous public meetings and outreach, sharing the project need and purpose and the SHOPP program as a funding source. Caltrans considered the public comments regarding the consideration of bicycle lanes and/or a transit only lane, but these features are infeasible, outside the parameters of SHOPP funding, and would not substantially reduce environmental impacts as explained above. Caltrans also considered relocating the State Route to align the project with California Drive, a street that is wider than existing SR 82, to achieve the need and purpose of the project. However, on balance, the PDT found that the SR 82 Relocation alternative would not substantially avoid or minimize environmental impacts. Therefore, the changes suggested by the commenters are infeasible.

Several commenters also stated that the Draft EIR/EIS is deficient because it fails to analyze additional alternatives related to multimodal transportation options.

The Draft EIR/EIS includes detailed analysis of a Build Alternative (i.e., the proposed project), and a No Build Alternative, which are described in detail in Chapter 2, Project Alternatives. Chapter 2 also explains in detail the reasons why three additional alternatives were considered, but eliminated from detailed analysis in the Draft EIR/EIS, as briefly summarized below.

The first of these additional alternatives was the "Road Diet," which would have: (1) changed the existing four-lane configuration from Peninsula Avenue (PM 12.95) to Ray Drive/Rosedale Avenue (PM 15.2) in the City of Burlingame to a two-lane configuration with a center turn lane;

and (2) would have narrowed the roadway width to allow for a wider area for vegetation adjacent to the roadway (to assist with preservation of historic trees). As noted in Draft EIR/EIS Chapter 2, the additional width necessary for tree protection did not allow for the inclusion of bicycle lanes in this alternative. Traffic modeling conducted for this alternative indicated that 21 new bus pull-outs would have been needed, the alternative would cause a substantial increase in vehicle delays and congestion during the PM peak hour, and it would cause reduced vehicular speeds and degradation of level of service at 24 intersections. It was also determined that this alternative would have resulted in a only two percent decrease in the number of trees being removed for the project overall and a only five percent decrease in the number of trees being removed that contribute to the historic Howard-Ralston Eucalyptus Tree Rows.

The second additional alternative, “SR 82 Relocation,” consisted of relocating SR 82 to a different route, which would have required extensive new agreements and rights-of-way to be acquired by Caltrans, and would also substantially increase the project cost as well as result in impacts to residential buildings and businesses. The new route would allow for wider lanes and the incorporation of multimodal facilities such as transit lanes, bicycle lanes, and connectivity with other local transportation planning efforts, along with potential preservation of the historic Howard-Ralston Eucalyptus Tree Rows. However, before the existing SR 82 corridor could be transferred over to the local jurisdictions, Caltrans would be required by California Vehicle Code Section 73 to place the highway “in a state of good repair.” This would mean implementing all of the repairs that are already incorporated into the Build Alternative (proposed project), resulting in the same impacts to the Howard-Ralston Eucalyptus Tree Rows as the Build Alternative. Furthermore, the alternative route contains additional potential historic resources that could be adversely affected by infrastructure upgrades, similar to effects on historic resources along the existing route.

The third additional alternative, “Extended Phase Construction,” would have extended the proposed industry-standard construction timeline to reduce the temporary visual effects of tree removal by slowly replacing the trees over an extended period of time. However, upon completion of this alternative, the historic Howard-Ralston Eucalyptus Tree Rows would be replaced to the same degree as they would under the Build Alternative (proposed project).

Caltrans considered public comments on the project purpose and need during the project scoping period. Public comments did not propose widening the roadway but were in some instances in favor of removing a general purpose lane by converting it to multimodal use (e.g., transit only or bicycle lanes). Converting the lanes to multimodal use would not decrease the environmental impacts identified in the EIR/EIS. Caltrans did consider removing a general purpose lane to minimize environmental impacts along SR 82. However, Caltrans’ traffic study found that removing a general lane of traffic would cause substantial delay and congestion along El Camino Real in the cities of Burlingame and San Mateo. Without widening and substantial acquisition of right of way, the existing roadway cannot be changed in a manner that would provide for the addition of bicycle lanes while at the same time maintaining the number of existing travel lanes. The project does provide enhancements for bicycle users crossing SR 82. During the design phase, Caltrans will work with local jurisdictions to identify potential additional pedestrian and bicycle improvements, where feasible.

Under NEPA, the range of alternatives that must be considered is limited to those reasonably related to the project’s purpose and need, described above. Including an additional alternative

that would be designed solely to incorporate multimodal transportation options is not related to the project purpose and need (see Section 2.1.5 for further discussion of Alternatives Considered but Eliminated from Further Discussion prior to Draft EIR/EIS).

Under CEQA, an EIR must describe a reasonable range of alternatives to the project, or to the project location, that could feasibly obtain most of the basic objectives of the project while avoiding or substantially lessening any of the significant effects of the project (CEQA Guidelines Section 15126.6). Feasibility takes into account, among other things, site suitability, economic viability, availability of infrastructure, jurisdictional boundaries, and whether a project proponent can reasonably acquire or control the alternative site. CEQA does not establish a set number or type of alternatives that must be analyzed in an EIR. Rather, the number and scope of alternatives is governed by the “rule of reason.” Furthermore, the alternatives evaluated in an EIR need only relate to the project as a whole, not to its various parts.

First and foremost, an alternative that would incorporate additional multimodal transportation options would not avoid or lessen any of the significant effects of the proposed project that have been identified in the Draft EIR/EIS, nor is there evidence that such an alternative would do so.

Secondly, the SR 82 Relocation alternative, which considers an alternative location for the project and would allow for additional multimodal transportation options, is infeasible because it may not be economically viable for Caltrans to obtain all of the necessary rights-of-way. The SR 82 Relocation alternative would also result in equally significant, adverse effects on a new set of cultural resources in a different location. As described above, before the existing SR 82 corridor could be transferred over to the local jurisdictions, Caltrans would be required by California Vehicle Code Section 73 to place the highway “in a state of good repair”, resulting in the same impacts to the Howard-Ralston Eucalyptus Tree Rows as the Build Alternative.

Thirdly, the alternatives analyzed in the Draft EIR/EIS have been governed by the “rule of reason” and are based on the constraints specific to this project: the fact that the project is intended for roadway replacement/rehabilitation (refer to Chapter Section 1.3 Purpose and Need); and as explained above, SHOPP projects are limited to improvements relative to the maintenance, safety, operation, and rehabilitation of state highways and bridges that do not add a new traffic lane to the system.

As previously described, Caltrans participated in a series of public and stakeholder meetings and workshops during the environmental review phase, during which time the potential for multimodal transportation improvements was discussed. For the reasons previously stated above, Caltrans determined that such improvements were unreasonable.

In summary, the Draft EIR/EIS adequately addressed the environmental impacts of the proposed project, appropriately evaluated both a “Build” and a “No Build” alternative, and appropriately dismissed an alternative as infeasible (the SR 82 Relocation alternative) that would have included additional bicycle and other multimodal transportation options. No further alternatives analysis is necessary.

5.4.1.2 Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows.

Several commenters raised concerns about the replacement planting of the trees along El Camino Real that would be impacted by the project. Caltrans is committed to rehabilitation of the

Howard-Ralston Eucalyptus Tree Rows. Caltrans' goal is to provide the maximum feasible number of replacement trees within the Tree Rows that are consistent with the Resource's historic listing and will best restore the tree-lined character of the existing condition.

Furthermore, to ensure the continued success of the Tree Rows, a Long-Term Management Plan will be completed during the design phase and will follow the Secretary of the Interior Standards for the Treatment of Historic Properties.

Prior to construction, the Tree Rows will be documented through the Historic American Landscapes Survey (HALS) program. Final details will be developed in consultation with the Burlingame Historical Society, City of Burlingame, and the State Historic Preservation Officer (SHPO).

The MOA for the proposed project includes a commitment to replant any trees removed by the project where possible and a formalized Long-Term Management Plan to address needed removals and replacements within the boundaries of the Tree Rows beyond the duration of the project. Tree replanting and the Long-Term Management Plan will follow the Secretary of the Interior Standards for the Treatment of Historic Properties. Consultation with the SHPO has been ongoing and will continue throughout the project.

Caltrans intends to achieve 100% replacement of trees that contribute to the Howard-Ralston Eucalyptus Tree Rows and within the overall project limits within the constraints of utility infrastructure, the clear recovery zone, and sight distance requirements of the Highway Design Manual. This is covered in depth in the El Camino Real Roadway Renewal Project (ECR Project) Tree Removal Evaluation and Replanting Plan (Appendix F of the Draft EIR/EIS). As described in Appendix F, the number of replacement trees, tree size at planting, and species of trees to be replanted within the Howard Ralston Eucalyptus Tree Rows will be determined during the design phase in consultation with the SHPO and stakeholders and will consider numerous factors. Chief among these considerations is the goal of maintaining the Tree Rows' listing on the NRHP; thus the physical attributes of scale, form and pattern of placement of the replacement trees will be critical factors to the Replanting Plan.

Community input on the Replanting Plan and the proposed replacement tree species is also critical to the development of the MOA with SHPO. The recommendations of the Burlingame El Camino Real Task Force, the Burlingame Historical Society, the City of Burlingame, and comments received during environmental document circulation are a large component of that input. In addition, Caltrans will hold a community workshop in 2022 to sustain public involvement in the replacement tree planting design and provide further opportunity for feedback from the broader community.

Replacement trees within the selected tree palette will conform to the characteristics (i.e., scale, form, and pattern of placement, among others) that make the existing trees contributing elements to the Tree Rows' NRHP eligibility. Replacement options will include trees that can best rehabilitate the existing Tree Rows and are able to thrive in the urban location. Horticultural and maintenance factors specific to the current urban conditions of the Tree Rows will also influence species selections to ensure the long-term survival and success of the Tree Rows. Caltrans, in consultation with SHPO, will determine the final selection of tree species to be replanted taking into account recommendations from the Task Force, Burlingame Historical Society, and other stakeholders.

Exact locations of replacement trees will be studied during the detailed design phase, taking into account the locations of above- and below-ground infrastructure, sight lines for motorists and pedestrians, and modified sidewalks and pavement within the limits of the Howard Ralston Eucalyptus Tree Rows and the project area. In addition, opportunities to add tree planting areas or restore previously removed ones will be evaluated on a case-by-case basis during detailed design of sidewalks and driveways.

Replacement planting will include a three-year plant establishment period implemented by the Landscape Contractor and overseen by Caltrans Landscape Construction. This initial period of maintenance has not been previously provided for replacement trees within the Tree Rows. The replacement planting will also include specific planting requirements, including but not limited to, the size of planting hole, soil amendments, and fertilizers. Together these mechanisms will ensure replacement trees are well-established, such that their future maintenance needs will be less intensive beyond the three-year period.

After the three-year plant establishment period, Caltrans Maintenance would assume responsibility for the Tree Rows unless a Maintenance Agreement is drafted with local cities or counties. Maintenance Agreements are developed during the design phase and are often sought by local agencies when the level of care desired for planting exceeds the Caltrans Maintenance standard level.

As described in the Draft EIR/EIS (see VIS-5), the Long-Term Management Plan will be developed during the design phase of the project, in consultation with independent arborists and in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Specific details regarding tagging of trees, methods of monitoring, and extension of the Management Plan beyond the 20-year period will be covered as part of the initial plan. Stakeholder input will be sought during development of the plan. Caltrans has also retained an independent arborist to advise on the care and maintenance of new and preserved trees in light of the proposed construction impacts.

The goal of the Long-Term Management Plan is to outline the process that will need to be followed once the current project is finished in order to ensure the continued health and NRHP listing of the Tree Rows. This will include a process for removal and replacement of contributing trees. A process for monitoring the health and maintenance of the trees will be included in the plan. Trees within the Tree Rows will be physically retagged post construction with a number system that is agreed upon by Caltrans Office of Cultural Resources Studies, City of Burlingame, and the Burlingame Historical Society. Additionally, the physical location of each existing and new tree will be documented via Global Positioning System (GPS).

Several commenters also expressed concerns regarding irrigation and soil composition requirements for preserved trees. Existing trees require different considerations than new trees. Substantial changes in soil composition and water regimes from added irrigation and soil amendments can result in serious deleterious effects to mature trees. During the design phase, emphasis will be placed on protection and preservation of existing trees' roots and the environment to which they are adapted, to the extent feasible. Irrigation and soil amendments for existing trees will be further evaluated during the design phase, in consultation with independent arborists and in the development of the Long-Term Management Plan.

5.4.2 Comments and Responses

The text of each comment received during review of the Draft EIR/EIS is presented below. Responses follow each comment that is related to the adequacy of the EIR/EIS for addressing environmental effects associated with the proposed project. Comments that raise multiple issues are divided by subheadings, followed by the comment responses. Caltrans has, in some instances, decided to incorporate changes to the text in response to public comments on the Draft EIR/EIS. These changes are summarized in the responses and incorporated into the Final EIR/EIS. Other revisions were made after the public review period to complete coordination with regulatory agencies. All revisions are indicated by a vertical line in the margin of the Final EIR/EIS text, similar to the one shown to the left of this paragraph.

5.4.2.1 U.S. Environmental Protection Agency (Connell Dunning, for Jean Prijatel, Manager, Environmental Review Branch)

Comment EPA-1

Historic Preservation

The Draft Environmental Impact Statement reports that the proposed project would remove and replant between 300 and 350 mature trees including 250 trees in the historic Howard-Ralston Eucalyptus Tree Rows. Up to 27 sites have been determined to be eligible for the National Registry of Historic Places. The Draft EIS states that an existing Memorandum of Agreement with the State Historic Preservation Office governs the replacement of trees along the historic Howard-Ralston Eucalyptus Tree Rows stretch of El Camino Real, and that Caltrans is pursuing ongoing consultation with SHPO for all the proposed tree replacements and the prospective 27 Registry-eligible sites in the project area. We note that the City of Burlingame is supportive of undergrounding utility lines, and that action could inform the height limits for new replacement trees.

Recommendations: The EPA recommends Caltrans complete the consultation and any resulting agreement with the State Historic Preservation Office before completing the combined Final EIS/Record of Decision for this project. We further recommend that any Memorandum of Agreement reached with the State Historic Preservation Office relating to this project include flexibility on height restrictions on replacement trees where undergrounding utilities are completed.

Response to Comment EPA-1

Caltrans has completed a Memorandum of Agreement (MOA) with the State Historic Preservation Office (SHPO) under PRC 5024. The MOA identifies that during the design phase Caltrans will work with an arborist to develop replanting recommendations for trees that contribute to the Tree Rows. The MOA includes a commitment to replant any trees removed by the project and a formalized Long-Term Management Plan (to be completed during the design phase) for the Tree Rows that will include a replanting plan for any tree removed within the boundary of the Tree Rows during future projects. Tree replanting recommendations and the Long-Term Management Plan will follow the Secretary of the Interior Standards for the Treatment of Historic Properties. The MOA does not specify which tree species will be planted, but that the trees should contribute to the NRHP eligibility of the Tree Rows. Consultation with SHPO has been ongoing and will continue throughout the project. Height restrictions will be addressed while developing the arborists' recommendations and replanting of the trees for this project, and such restrictions may not be required in areas where utilities are proposed for undergrounding.

Comment EPA-2

Complete Streets

The Draft EIS reports that the project's build alternative will incorporate a number of Complete Streets design elements connected with drainage improvement, rehabilitated sidewalks, and ADA-compliant curb ramps. The project will add three pedestrian hybrid beacon crossings at Bellevue Avenue, Willow Avenue, and Palm Drive, and will consider pedestrian median refuge islands where space in El Camino Real allows. The City of Burlingame's Comprehensive Pedestrian and Bike Plan 2020 identifies the parallel California Drive as the preferred bike route between similar logical termini as the proposed project on El Camino Real, and identifies Class III bike route crossings of El Camino Real. The City's plan also identifies pedestrian and bicycle buffer areas that support school access. We offer the following recommendations to improve the environmental outcomes of these proposed Complete Streets features.

Response to Comment EPA-2

This comment contains introductory statements relating to EPA's comments on the Draft EIR/EIS, which are addressed in the responses below. No response is required.

Comment EPA-3

Stormwater Design

The EPA has previously supported efforts on other sections of El Camino Real to implement Complete Street and sustainable street design elements, as part of the Grand Boulevard Initiative. We note Caltrans will incorporate bioretention and biofiltration devices on up to 24.4 acres of replaced impermeable surfaces to comply with the Caltrans National Pollutant Discharge Elimination System permit.

Recommendation: The EPA encourages Caltrans to describe the specific green infrastructure design elements it may include in this build alternative, and to further consider permeable surfaces as part of the rehabilitated sidewalks if practicable.

Response to Comment EPA-3

Not all specific green infrastructure design elements can be determined at this stage in the design of the proposed project. These are typically reserved for the PS&E phase when Caltrans has more information to assist with our design decisions. We are, however, planning on using rubberized hot mix asphalt (RHMA) as the final roadway surface treatment. RHMA-G utilizes recycled rubber as a major component of the mix and helps to reduce the amount of rubber sent to landfills. To the extent practicable, Caltrans will consider the incorporation of other green infrastructure design elements during the design phase of the project, such as permeable sidewalk surfaces.

Comment EPA-4

Bicycle Connectivity

The City of Burlingame's Comprehensive Pedestrian and Bicycle Plan identifies Ray Avenue and Carmelita Avenue as two existing Class III bicycle routes with bicycle crossings over El Camino Real and between the logical termini of the proposed project. The Ray Avenue Class III bike route is identified in Burlingame's plan as within a quarter-mile buffer supporting access to Lincoln Elementary School. The City's plan also identifies Carmelita Avenue as a route with an elevated number of pedestrian and bicycle collisions, including the segment overlapping with the project area.

Recommendations: The EPA recommends the Final EIS 1) clearly describe which intersections along El Camino Real will host bicycle crossings in support of the City of Burlingame's plan, and 2) describe what specific bicycle facilities and road treatments, such as bike boxes or bike traffic lights, will be included to facilitate safer and efficient use of these crossings over El Camino Real.

Response to Comment EPA-4

During the design phase, Caltrans will coordinate with jurisdictions within the project limits on the inclusion of improved bicycle and pedestrian crossings at all El Camino Real intersections within the project limits, in addition to the safety improvements already proposed for this project. Such improvements will include:

- Realignment of existing crosswalks
- Advance stop pavement markings
- Adjusting signal timing to provide for a leading pedestrian interval
- Consideration of signal timing adjustments
- Prohibition of right turns on red lights if feasible

These pavement markings and other safety improvements would be surface- or pavement-level details typically determined during the design phase, not the environmental phase, as such improvements generally do not have the potential to result in impacts to the environment. Additional details regarding potential inclusion of these improvements has been added to Section 2.1.1 of the Final EIR/EIS.

Comment EPA-5

Pedestrian Connectivity

The proposed action commits to adding pedestrian hybrid beacon crossings at Willow Drive, Palm Drive, and Bellevue Avenue, supporting safer routes to educational and religious facilities, including McKinley Elementary School and St. Paul's Nursery School. The Bellevue Avenue crossing would also support pedestrian access to adjacent retail sites in the Downtown Burlingame area.

Recommendation: The EPA recommends Caltrans consider pedestrian crossing improvements on and along El Camino Real at Broadway Avenue to support safer pedestrian access to another retail business hub and destination for residents adjacent to the project area.

Response to Comment EPA-5

As described in Section 2.1.1 of the Final EIR/EIS, during the design phase, Caltrans will coordinate with jurisdictions within the project limits on the inclusion of improved bicycle and pedestrian crossings at all El Camino Real intersections within the project limits, including at Broadway Avenue. Also, please see the response to Comment EPA-5.

Comment EPA-6

Bus Stop Structures

Samtrans maintains a bus route with two service lines in the project area of El Camino Real, and many bus stop seating areas lack shade structures. Attracting transit ridership, particularly after construction phase service disruptions, is a critical part of achieving the transportation goals for communities and agencies all along the El Camino Real, as documented in the Grand Boulevard Multimodal Transportation Corridor Plan. The project's tree removals may adversely impact the shade offered for waiting bus riders and that part of their transit experience.

Recommendation: The EPA recommends the El Camino Real rehabilitation action for the project area commit to preserving, replacing, or improving bus stop shaded seating, and to document any commitments for increased shading, and the responsible parties, in the Record of Decision.

Response to Comment EPA-6

During the design phase, Caltrans will coordinate with SamTrans to consider transit infrastructure improvements within the scope of the ECR Project. This information has been added to Section 2.1.1 of the Final EIR/EIS. However, the project will result in no impacts to existing transit facilities as all bus stops within the project limits will be replaced in kind. Therefore, no commitment to install upgraded bus stop seating has been added to the Record of Decision.

5.4.2.2 San Francisco Public Utilities Commission (Anna Fedman, Environmental Compliance Planner)

Comment SFPUC-1

Thank you for the opportunity to review the Caltrans Draft Environmental Impact Report/Environmental Impact Statement (Draft EIR/EIS) for the El Camino Real Roadway Renewal Project. I reviewed the document and have a few comments regarding section 3.1.4. Utility/Emergency Services:

- The San Francisco Public Utilities Commission (SFPUC) requests that Caltrans describe the SFPUC's pipelines as part of the existing conditions at this site. The SFPUC has two water transmission pipelines located in the public right-of-way (ROW) directly under El Camino Real from East Santa Inez Avenue, in the City of San Mateo to Millbrae Avenue, in the City of Millbrae. Please note that, Crystal Springs Pipeline (CSPL) #1 is an inactive line, but CSPL #2 is an active pipeline for the Hetch Hetchy Regional Water System. For your reference, the attached maps show the approximate locations of CSPL #1 and #2.
- The SFPUC also requests that Caltrans describe potential impacts to CSPL #1 and #2 and include a statement that the project sponsor will work with the SFPUC to coordinate any future utility work/connection that involves working over, under or about the CSPLs in the public ROW. This coordination would involve distributing engineering plans to the SFPUC for review during preliminary and detail design.

Please note that any proposed improvements on SFPUC infrastructure must comply with SFPUC ROW policies and must be reviewed through the SFPUC's Project Review process. All proposed projects and activities on SFPUC lands must be reviewed by the SFPUC's Project Review Committee (committee) to determine whether a proposal is compatible with SFPUC adopted plans and policies prior to obtaining written authorization from the SFPUC. During Project Review, the committee may require modifications to the proposal and/or require implementation of avoidance and minimization measures to reduce negative impacts and to ensure that the proposal conforms to applicable plans and policies. Therefore, it is important to schedule projects for review at the earliest opportunity to address any potential project issues.

To initiate the Project Review process, please visit the SFPUC's Project Review Committee webpage at <http://sfwater.org/ProjectReview> to download a copy of the current Project Review application. Once the application is completed, please email your application and supporting attachments (project description, maps, drawings and/or plans) to projectreview@sfwater.org. Completed applications with required attachments are scheduled in the order they are received for the next available Project Review Committee meeting date.

Response to Comment SFPUC-1

Thank you for the information regarding applicable SFPUC utilities. Caltrans will use this information for reference and will verify all utilities during final design. Caltrans will comply with all applicable SFPUC right-of-way policies. Text has been added to Section 3.1.4.1 of the Final EIR/EIS describing SFPUC's two water pipelines and compliance with SFPUC policies.

5.4.2.3 City of San Mateo Public Works Department (Matthew Zucca, Director of Public Works)**Comment City of San Mateo-1**

The City did not receive sufficient coordination from Caltrans for a project of this size. One letter to the San Mateo Planning Department is insufficient coordination with an affected agency. Community meetings and engaged stakeholder discussions should be held during future phases of the project.

Response to Comment City of San Mateo-1

Caltrans held several public engagements in advance of the release of the Draft EIR/EIS. Caltrans also held two meetings on the Draft EIR/EIS to provide opportunity for all stakeholders. The mayor of San Mateo, the vice mayor, several council members, and the planning commission all received the series of emails that disclosed the dates, times, and locations of the public meetings that led up to the public meetings for all phases of the environmental planning process. Caltrans recognizes the need to include the City of San Mateo in project coordination during the design phase and will continue to work with the City as a full partner on addressing their concerns.

Comment City of San Mateo-2

The EIR does not consider the City of San Mateo Sustainable Streets Plan.

Response to Comment City of San Mateo-2

Thank you for your comment. Section 3.1.1.1 and Table 3.1.1-1 of the EIR/EIS have been updated to include a description of the project's consistency with the City of San Mateo Sustainable Streets Plan (2015). Reference to the plan is also included in the cumulative impacts analysis of the Draft EIR/EIS (see Section 3.7.2).

Comment City of San Mateo-3

The City requests the opportunity to review, comment, and provide input on design of any facilities or improvements, particularly those where the City would be responsible for maintenance under existing or proposed maintenance agreements.

Response to Comment City of San Mateo-3

Thank you for your comment. Caltrans will continue to coordinate with the City of San Mateo during the design and construction phases of the project.

Comment City of San Mateo-4

Page 2-2 Pedestrian Improvements. The EIR states that the sidewalk will be upgrade to widths of 5 – 6 feet. The specified width is not consistent with the adopted "overall sidewalk width" of the City's adopted Pedestrian Master Plan.

Response to Comment City of San Mateo-4

As per American with Disabilities Act (ADA) Standards, standard sidewalk widths in areas with planter strips that act as a buffer in between the sidewalk and the roadway will be five feet. Where there is no buffer, the standard sidewalk width will be six feet. Caltrans will follow Highway Design Manual standards for roadway and sidewalk improvements within state right-of-way.

During the design phase, Caltrans will work with the City of San Mateo to identify appropriate areas where Caltrans standard sidewalk widths could be increased.

Comment City of San Mateo-5

Page 2-2. Based on the lack of proposed pedestrian improvements in the City of San Mateo limits, it does not appear that Caltrans has incorporated City of San Mateo adopted Pedestrian Master Plan.

Response to Comment City of San Mateo-5

As described in Draft EIR/EIS Section 2.1.1, all existing sidewalks from East Santa Inez Avenue (PM 12.3) in the City of San Mateo to Dufferin Avenue (PM 15.3) in the City of Burlingame would be upgraded to ADA standards as part of the project. Consistency with the City of San Mateo | Citywide Pedestrian Master Plan is summarized in Table 3.1.1-1 in Section 3.1.1.2.

This comment does not specify what other aspects of the Pedestrian Master Plan the City is referring to. However, during the design phase, Caltrans will work with the City of San Mateo to identify potential additional pedestrian and bicycle improvements, where feasible.

Comment City of San Mateo-6

Page 2-3. The EIR does not specify the type of “lighting upgrades” that will be provided. Per the City of San Mateo Pedestrian Master Plan, El Camino Real from Peninsula Avenue to Santa Inez is a designated for pedestrian-scale lighting. See Appendix F of the City of San Mateo’s Pedestrian Master Plan.

Response to Comment City of San Mateo-6

Caltrans will work closely with all of the jurisdictions within the project limits during the design phase to ensure that existing lighting potentially affected by project construction would be replaced in kind. In addition, Caltrans will work with local jurisdictions to consider replacement lighting that complies with applicable plans and regulations, including the Highway Design Manual and City of San Mateo standards.

Comment City of San Mateo-7

Page 2-4. In Figure 2.1.1.2, the EIR shows the sidewalk will be upgrade to widths of 5 – 6 feet. The specified width is not consistent with the adopted “overall sidewalk width” of the pedestrian master plan.

Response to Comment City of San Mateo-7

Please see the response to Comment City of San Mateo-4 for a discussion of sidewalk widths consistent with the Highway Design Manual.

Comment City of San Mateo-8

Page 2-5. Under construction lane closures and detours, the EIR does not specify whether detours will impact residential roads and neighborhoods.

Response to Comment City of San Mateo-8

As described in Section 2.1.1.2, residential and business access would be maintained during construction. As described in the Draft EIR/EIS, during the design phase, a Transportation Management Plan (TMP) will be prepared in accordance with Caltrans requirements and guidelines to address any delays and/or detours and minimize the construction-related delays and inconvenience for emergency service providers, transit providers, residents, businesses, and the traveling public. The TMP will include input from the jurisdictions along the project corridor and emergency service providers; notification to emergency service providers, transit operators, and the public of lane closures; coordination with the California Highway Patrol (CHP) and local law enforcement on contingency plans; and specifications for using portable changeable message signs and the CHP Construction Zone Enhanced Enforcement Program where possible to minimize construction related delays.

As described in Section 2.1.1.2, a public outreach campaign will be developed that will include the designation of a Public Information Officer (PIO) who will act as a single point of contact to inform local jurisdictions and the public on all issues related to implementation of the project, including the construction schedule, traffic control, temporary changes in traffic circulation, utility relocation and temporary outages, and construction staging. This information will be made available to residents and business owners in the project area.

Comment City of San Mateo-9

Page 2-5. Page 2-5 states “The project design also includes permanent BMPs to avoid the potential for project-related storm water discharges to substantially alter drainage patterns, violate water quality standards, or substantially degrade water quality. Permanent BMPs proposed for the project include bioretention or biofiltration devices. The placement of each will be determined during final design.” Specify that the City of San Mateo will be included in document/plan review for design and location of bio-retention facilities within the City of San Mateo city limits, and clarification on any features within project limits for which City is responsible for maintenance.

Response to Comment City of San Mateo-9

During the design phase, the City of San Mateo will be given the opportunity to review the design, location, and maintenance agreements for any permanent storm water treatment facilities proposed within City limits.

Comment City of San Mateo-10

Page 2-7. City requests to be included in review of Transportation Management Plan (TMP) during final design development. TMPs shall not directly or indirectly divert traffic onto residential roadways.

Response to Comment City of San Mateo-10

All cities within the project limits, including the City of San Mateo, will be included in the review and finalization of the TMP.

Comment City of San Mateo-11

Page 2-11. Design Standards. Caltrans does not show conformance to the City of San Mateo's Pedestrian Master Plan design guidelines. The EIR is inconsistent with pedestrian design guidelines within the City of San Mateo.

Response to Comment City of San Mateo-11

The City's comment does not specify which aspect of the City of San Mateo's Pedestrian Master Plan design guidelines that it asserts the project does not conform with. However, please see the response to Comment City of San Mateo-4 for a discussion of sidewalk widths consistent with the Highway Design Manual and the response to Comment City of San Mateo-5 for a discussion of project consistency with the City of San Mateo's Pedestrian Master Plan design guidelines.

Comment City of San Mateo-12

Page 3-4. The EIR states that areas surrounding the project limits are subject to several community, regional, and transportation plans. The plans discussed do not include an evaluation of the conformance or applicability with the City's Green Infrastructure Plan. Caltrans should document its evaluation of the project potential for inclusion of green infrastructure elements consistent with the City of San Mateo Green Infrastructure Plan.

Response to Comment City of San Mateo-12

The City of San Mateo's Green Infrastructure Plan states that "the City of San Mateo has prepared this GI [Green Infrastructure] Plan to guide the siting, implementation, tracking, and reporting of GI projects on City-owned land over the next several decades". Since all of the planned permanent improvements for the project are within existing Caltrans right-of-way, and the City's Green Infrastructure Plan is specific to City-owned land, the proposed project would not conflict with policies or goals of the plan. The project does not preclude future projects to incorporate green infrastructure in the corridor. Please also see the response to Comment EPA-3 regarding green infrastructure design elements.

Comment City of San Mateo-13

Page 3-7. The Build Alternative option is not consistent with the City of San Mateo Pedestrian Master Plan as its defined improvement does not meet the design guidelines outlined in the plan.

Response to Comment City of San Mateo-13

The City's comment does not specify which aspect of the City of San Mateo's Pedestrian Master Plan design guidelines that it asserts the project does not conform with. However, please see the response to Comment City of San Mateo-4 for a discussion of sidewalk widths consistent with the Highway Design Manual and the response to Comment City of San Mateo-5 for a discussion of project consistency with the City of San Mateo's Pedestrian Master Plan design guidelines.

Comment City of San Mateo-14

Page 3-7. The EIR does not include the development of high quality and pedestrian accessible transit stops on the corridor. The EIR is inconsistent with the City of San Mateo's Pedestrian Master Plan Objective 1.C.

Response to Comment City of San Mateo-14

As Caltrans is not a transit provider, Pedestrian Master Plan Objective 1.C ("work with transit providers to develop high quality and pedestrian accessible transit stops and stations") is not applicable to the proposed project. Nevertheless, all existing bus stops within the project limits will be replaced in kind. During the design phase, Caltrans will coordinate with SamTrans to identify priority locations for additional transit enhancements (such as bus shelters) within the scope of the project. In addition, pedestrian improvements included in the project will support transit ridership by increasing pedestrian access to transit stops.

Comment City of San Mateo-15

Page 3-16. The EIR is silent as to whether the project Build Alternative will impact City wastewater conveyance system components or not.

Response to Comment City of San Mateo-15

Caltrans does not anticipate that the Build Alternative would impact any of the City's wastewater conveyance system components.

Comment City of San Mateo-16

Page 3-18. 3.1.5 Visual/Aesthetics. The EIR does not adequately describe, evaluate, and address the visual aesthetic impact of tree removal within San Mateo. It is not possible from information provided to determine the number of trees impacted in San Mateo.

Response to Comment City of San Mateo-16

The project does not anticipate tree removal in the City of San Mateo. Due to the size and maturity of trees in this portion of the project area, and more recent sidewalk and roadway construction, the impacts of construction on the trees' root structure is anticipated to be relatively minor. Therefore, Caltrans visual assessment is based upon the expectation that the existing trees in the City of San Mateo, within Caltrans right-of-way, would be protected in place per Caltrans standard specifications and procedures. As such, no visual impact is anticipated.

If during the design phase, unanticipated tree removals within the City of San Mateo are identified as necessary, Caltrans would replace removed trees per the Replacement Planting policy. Caltrans would coordinate the provision of this replacement planting with the City of San Mateo.

Comment City of San Mateo-17

Page 3-67, 68. Pages 3-67 and 3-68 states that "the project will provide storm water treatment (i.e. bioretention or biofiltration devices) up to 24.4 acres to be in compliance with Caltrans NPDES permit requirements....Construction details for these design features will be incorporated into the final project design documents." Specify that the City of San Mateo will be included in document/plan review for design and location of bio-retention facilities within the City of San Mateo city limits, and clarification on any features within project limits for which City is responsible for maintenance.

Response to Comment City of San Mateo-17

During the design phase, Caltrans coordinate with the City of San Mateo on review of the location(s) of storm water treatment facilities and proposed maintenance agreements.

Comment City of San Mateo-18

Page 3-68. The EIR does not appropriately identify the impairments of receiving waters from stormwater discharges from the project area. This project drains to San Mateo Creek, which is on the 303(d) list as an impaired waterbody for trash. One major source of trash is roadway litter entering the City's storm drain system and draining to the creek. CalTrans has identified the El Camino Real project segment as not a significant trash generating area and thereby not requiring full trash capture. The City of San Mateo has conducted Trash Assessments in the area of this segment, and determined the area is a moderate trash generation area. The City is required to fully control moderate trash generating areas.

The Municipal Regional Stormwater Permit requires the City to meet 100 percent trash load reductions or no adverse effects from storm drain discharges to surface waters using capital improvements such as full trash capture devices. The Regional Water Board encourages CalTrans to partner with local municipalities installing stormwater treatment facilities for impaired waterbodies. To the extent CalTrans is discharging trash at any level to the City's storm drainage system, the City requires CalTrans to coordinate with the City of San Mateo to evaluate the installation and maintenance of full trash capture devices, which would benefit both CalTrans and the City of San Mateo.

Response to Comment City of San Mateo-18

As described in Section 3.2.2.3 of the Draft EIR/EIS, the project limits have not been identified as a Significant Trash Generation Area (areas identified by Caltrans and concurred by the State Water Resources Control Board as contributing trash to the state's waterways); therefore, Trash Capture is not required. While no Trash Captures devices are proposed, Caltrans welcomes the opportunity to collaborate with the City of San Mateo on the need for, installation, and maintenance of trash capture devices within the project limits.

Comment City of San Mateo-19

Page 3-83. Section 3.4 Construction Impacts (Noise). The EIR does not establish a baseline noise level against which to compare the impacts of construction-related noise particularly in residential areas. Estimated noise is compared against Caltrans' own specifications, which is an inadequate threshold for comparing estimated impacts. Given the potential for work at night, the EIR should compare construction noise impacts against the change in noise rather than Caltrans' self-established threshold. Proposed mitigation measures do not include public notification. City requests Caltrans include a public outreach requirement as a mitigation measure, to be included in the construction contract, to ensure contractor adequately notices the surrounding residents, especially for night work.

Response to Comment City of San Mateo-19

As described in Chapter 3 and Section 3.4 of the Draft EIR/EIS, the project is a Type III project under 23 Code of Federal Regulations 772. Therefore, a noise analysis is not required. However, because of the hundreds of receptors in close proximity, along with the likelihood that portions of the project will take place at night, construction noise was evaluated. The analysis method used to determine whether adverse construction noise impacts in the project area would arise was the FHWA Roadway Construction Noise Model (RCNM) version 1.1. This model is FHWA's national model for the prediction of construction noise. The model includes representative sound levels for the most common types of construction equipment and the estimated percentage of time that the equipment would be operating at full power.

The project is subject to both the 2018 Caltrans Standard Specifications Section 14-8.02, and California Streets and Highway Code Section 216. Caltrans Standard Specifications Section 14-8.02 require construction activities are not to exceed 86 dBA Lmax at a distance of 50 feet from 9 p.m. to 6 a.m. California Streets and Highway Code Section 216 requires that average hourly construction noise (as measured by Leq) heard internally at school locations not exceed 52 dBA. While construction-period noise would be temporary and would only occur at discrete locations along the corridor at any one time, the model determined that construction noise would exceed these noise limits at some locations along the corridor. Therefore, Noise measures NOI-1 and NOI-2 will be implemented to avoid, minimize, and mitigate impacts from construction noise.

As described in Sections 2.1.1.2, a public outreach campaign will be developed that will include the designation of a Public Information Officer (PIO) who will act as a single point of contact to inform local jurisdictions and the public on all issues related to implementation of the project, including the construction schedule, traffic control, temporary changes in traffic circulation, utility relocation and temporary outages, and construction staging. This information will be made available to residents and business owners in the project area. The PIO will be available to address any noise complaints during construction.

Comment City of San Mateo-20

Page 3-83. Construction Impacts. The EIR does not adequately address temporary construction impacts such as the effect on parking associated with construction and workers. The EIR should identify whether staging areas will accommodate worker parking to avoid unnecessary impact to parking in neighborhoods.

Response to Comment City of San Mateo-20

Please see the response to City of San Mateo-Comment 8 for a discussion of the proposed Traffic Management Plan (TMP) that will be implemented during project construction. Potential effects on parking would be addressed in the TMP.

5.4.2.4 City of Burlingame (Syed Murtuza, Director of Public Works)

Comment City of Burlingame-1

Utilities/Emergency Services

The Build Alternative would require temporary relocation of overhead electrical lines during construction that would be restored above ground for the Build Alternative without inclusion of the design option, and underground with the inclusion of the design option. This statement fails to account for and address significant cost savings to the project's budget if utilities are placed underground prior to implementation of the Project where temporary relocation of overhead facilities are no longer necessary.

Response to Comment City of Burlingame-1

As described in Draft EIR/EIS Section 2.1.1.1, final approval of utility undergrounding would depend upon agreements between the City of Burlingame, Caltrans, PG&E, and other utility providers. This design option would be constructed as long as necessary funding and approvals are secured by the City of Burlingame. Cost considerations arising from details regarding the timing and construction sequence of utility undergrounding will be determined during the design phase of the project.

Comment City of Burlingame-2

Visual/Aesthetic Impacts

VIS-2 provided in the DEIR is general in nature. The statement mentions “sight distance standards” which are understood to be generally restrictive for Caltrans. Replacement planting species and size is referenced to be determined during final design without providing specific information. The DEIR should include more specific information as required to mitigate 1:1 ratio and reestablish the Howard-Ralston Eucalyptus Tree Rows. The DEIR should include planting species and size and conformance to the historical grove requirements. A detailed map of locations of tree removals and tree replantings should be included and made available for review as part of the DEIR process.

Furthermore, the City has concerns with the aesthetics inconsistency from the mismatch of different species and sizes of trees. The City of Burlingame must be involved in decisions regarding tree replacement planting species and size.

VIS-3 fails to address long-term health of existing trees to remain. The DEIR should include an evaluation of the conditions of the remaining trees to ensure their establishment and long-term health. This includes installation of irrigation system and soil amendment for existing trees. Furthermore, the DEIR should include details of future impacts of remaining trees to the newly constructed infrastructure and address mitigation of any trees that may be a safety concern.

Response to Comment City of Burlingame-2

Please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows, for information about design considerations of tree planting locations, the Long-Term Management Plan for tree replanting, and tree species and size selection, establishment, irrigation, and maintenance. Also, the Visual Impact Assessment (VIA), which was listed as a technical study in the Draft EIR and available for public review during the comment period, includes maps of anticipated trees to be removed by the project. For additional convenience, the VIA is included as Appendix J to the Final EIS/EIR. Since the VIA was prepared, a further clarification of the trees designated for either preservation or removal has been provided in a Tree Preservation Assessment by an experienced professional arborist. The Tree Preservation Assessment is included as Appendix K to the Final EIS/EIR. The location, species, and size of replacement trees will depend on consultation with SHPO and collaboration with the City of Burlingame, other jurisdictions, and the public as set forth in Master Response 2.

Comment City of Burlingame-3

Cultural Resources

Mitigation measures are general in nature, make no significant recommendations, and do not make any specific and/or significant commitments. The City requests that the DEIR include Caltrans’ commitment and recommendations.

Response to Comment City of Burlingame-3

Effects analysis of potential impacts to cultural resources and mitigation measures for these effects are developed in a multi-step process in accordance with the January 1, 2014, First Amended Section 106 Programmatic Agreement (PA) among the Federal Highway Administration (FHWA), the Advisory Council on Historic Preservation, the SHPO, and Caltrans. The preliminary findings of the Finding of Adverse Effects (FAE) were presented at the online Draft EIR/EIS public meeting held July 14, 2021. Public comments from this meeting

were taken into consideration during the Section 106 effects analysis. In August 2021, the FAE was circulated to Section 106 stakeholders. The preliminary cultural resources Finding of Adverse Effects (FAE) analysis, which is summarized in Table 3.1.6-2 (EIR/EIS Section 3.1.6.3), was finalized after circulation of the Draft EIR/EIS and identification of the preferred alternative (see Final EIR/EIS Section 2.1.4). This process allows for public review and comment on the preliminary findings, and for the finalized FAE analysis to take public comments into consideration.

Then, the FAE was submitted to SHPO for concurrence on the effects to historic properties. SHPO concurrence was received on November 18, 2021. The MOA documents the avoidance, minimization, and mitigation measures for cultural resources and is found in Appendix H and the measures are listed in Appendix D of this document. Caltrans consulted with the City in the development of the MOA and included them as an invited signatory. The MOA was executed on February 17, 2022. The avoidance, minimization, and mitigation measures included in the MOA and Final EIR/EIS address the concerns that the City and other members of the public have expressed in terms of tree selection, locations of replacement trees, the plant establishment period, and long term maintenance.

Comment City of Burlingame-4

Construction Impacts (Noise)

The Project anticipates nighttime construction. This section of El Camino Real is a high-density residential district. Given historical response to any night construction, nighttime construction should be done only when absolutely necessary. In addition, lane closures/reductions could result in significantly less complaints from the community compared to nighttime construction. Caltrans should consider the benefits of seasonal construction near the vicinity of McKinley Elementary.

Consideration should also be given to other Construction Impact factors. Construction activities must take into account and maintain continued and unimpeded access to schools, businesses, residences, and emergency services at all times. Additionally, heritage tree removals are potentially the most impactful phase of the work to traffic on El Camino Real. Further details of what will occur, such as anticipation of full roadway closure and estimated timeframes should be included in the DEIR.

Response to Comment City of Burlingame-4

Please see the response to Comment City of San Mateo-19 for a discussion of construction noise impacts and the proposed public outreach campaign to address noise, circulation, and other construction impacts. Caltrans will consider the suggestion regarding seasonal construction near McKinley Elementary in the development of construction staging. The TMP (Section 2.1.1.3) will include measures to maintain access to schools, businesses, residences, and emergency services.

Comment City of Burlingame-5

Roadway Rehabilitation (2-1)

To address structural inadequacy of the roadway, the entire pavement structural section (as shown in Figure 1.3.2-2) would be removed and reconstructed between East Santa Inez (PM 12.3) and Murchison Drive (PM 15.8). However, the DEIR does not address potential conflicts with shallow utilities that may be in conflict with the structural section of the roadway. The DEIR should include measures addressing shallow utilities encountered during subgrade reconstruction.

Response to Comment City of Burlingame-5

Caltrans has identified utilities and service systems within the project limits as set forth in Section 3.1.4.1. During the design phase, the roadway will be potholed to verify and determine the location of all additional existing utilities. Additional utilities discovered during project construction will be protected in place. If relocation is unavoidable, Caltrans will coordinate with the affected utility owner, as noted in Section 3.1.4.2.

Comment City of Burlingame-6

Drainage Improvements (2-2)

The City strongly recommends that the drainage system should be designed with redundancy to account for flow blockage over stormwater inlets. The DEIR should include locations of existing storm drainage system and new storm drainage system. The DEIR should also provide sufficient calculations related to sizing of the storm drainage system, address concerns of flooding, and provide structural integrity analysis of existing box culverts and necessary mitigation measures.

Response to Comment City of Burlingame-6

The level of drainage detail requested by the commenter is typically not determined until the PS&E phase of project development. All calculations related to sizing of the storm drainage system will be done during the design phase and will be based on latest flow data and Caltrans standards. Caltrans will continue to coordinate with the City of Burlingame on the design of all drainage system improvements.

Comment City of Burlingame-7

Pedestrian Improvements (2-2, 2-3)

The DEIR addressed sidewalk improvements from East Santa Inez Avenue (PM 12.3) in the City of San Mateo to Dufferin Avenue (PM 15.3) in the City of Burlingame, but fails to address pedestrian improvements north of Dufferin Avenue. The City disagrees with the statement that the “sidewalks north of Dufferin Avenue in the cities of Burlingame are already compliant with ADA standards.” In addition, the City disagrees that “the only portion of the project limits that currently lacks sidewalks is along the southbound side of El Camino Real from Bellevue Avenue to Floribunda Avenue.” There are several locations along the El Camino Real corridor with gaps in sidewalks and/or need ADA improvements that must be addressed.

The DEIR should identify the lack of sidewalks and the gaps in pedestrian access along the west side of El Camino Real between Ray Drive and Dufferin Avenue. The DEIR should also consider improving and enhancing the existing trail/path on the east side of El Camino Real north of Highway Road to a Class I facility. Furthermore, consideration should be given to close proximity of adjacent crossings from El Camino Real intersections at Oxford Road/Cambridge Road and at Trousdale Drive.

In addition, the DEIR should consider bicycle access from side streets at signalized intersections such as green “bike boxes” with video cameras or Type D loops for detection.

Response to Comment City of Burlingame-7

The project includes the upgrade of the asphalt path along the west side of El Camino Real between Ray Drive and Dufferin Avenue to full ADA standards.

During the design phase, Caltrans will work with local jurisdictions within the project limits on final design of surface- and pavement-level upgraded pedestrian and bicycle facilities that are

consistent with the description of the preferred alternative. At the request of the City of Burlingame, this will include upgrades to the existing trail/path on the east side of El Camino Real north of Highway Road.

Loop detectors that can detect all types of traffic (including trucks, cars, buses, motorcycles, and bicycles) are under consideration for installation along El Camino Real within the project limits.

Comment City of Burlingame-8

Utilities (2-4)

The undergrounding of utilities is a critical requirement for historical tree mitigation. For this reason, the DEIR should address the need to plan and coordinate the utility undergrounding operation, if performed by outside PG&E contractor; with the construction sequencing of the project to limit cost impacts.

2.1.1.1 Design Option to Underground Utilities: The DEIR did not address lighting as part of the utility undergrounding option as part of the Build Alternative. As part of the option with utility undergrounding, installation of new lighting standards where current lighting is situated on the utility poles must be addressed in the DEIR.

Response to Comment City of Burlingame-8

Please see response to Comment City of Burlingame-1 for a discussion of utility undergrounding; and response to Comment City of San Mateo-6 for a discussion of potential lighting to be implemented with the proposed project.

Comment City of Burlingame-9

Construction Lane Closures and Detours (2-5)

Caltrans anticipates project construction activities to occur both during daytime and nighttime hours and over a period of three years. The DEIR should address Project public outreach, including but limited to: an outreach plan with a designated single point of contact for City staff and the City of Burlingame community. The outreach plan should consist of a noticing process and advance notification of changes in traffic circulation.

As previously mentioned, this section of El Camino Real is a high-density residential district. Given historical response to any night construction, nighttime construction should be done only when absolutely necessary. In addition, lane closures/reductions could result in significantly less complaints from the community compared to nighttime construction.

Response to Comment City of Burlingame-9

Please see Section 2.1.1.2 of both the DEIR and FEIS/EIR, which addresses public outreach for the project. Also, please see response to Comment City of San Mateo-8 for a further discussion of the proposed TMP to be implemented during project construction; and response to Comment City of San Mateo-19 for a discussion of construction noise impacts and the proposed public outreach campaign.

Comment City of Burlingame-10

Traffic and Transportation/Pedestrian and Bicycle Facilities (3-2)

The DEIR should also consider improving and enhancing the existing trail/path on the east side of El Camino Real north of Highway Road to a Class I facility. Consideration should also be given to enhancement of bicycle facilities on El Camino Real north of Mills Avenue. The DEIR should also

include bicycle access improvements from side streets at signalized intersections such as green “bike boxes” with video cameras or Type D loops for detection.

As mentioned, consideration should be given to close proximity of adjacent crossings from El Camino Real intersections at Oxford Road/Cambridge Road and at Trousdale Drive. In addition, the DEIR should identify pedestrian improvements due to the lack of sidewalk and gap in pedestrian access along the west side of El Camino Real between Ray Drive and Dufferin Avenue.

Response to Comment City of Burlingame-10

Please see response to Comment City of Burlingame-7 for a discussion of potential improvements to bicycle and pedestrian facilities in the project limits.

Comment City of Burlingame-11

Existing Visual Resources (3-19)

A detailed map of locations of tree removals and tree replantings should be included and made available for review as part of the DEIR process.

Response to Comment City of Burlingame-11

The Visual Impact Assessment (VIA), which was made available for review during the public comment period, includes mapping of the anticipated tree removals and is a publicly available document. For convenience, the VIA is included as Appendix J. A further clarification of the trees designated for either preservation or removal has been provided in a Tree Preservation Assessment by an experienced professional arborist. The Tree Preservation Assessment is included as Appendix K to this document. Final determinations for tree removals are being developed with the input of an independent arborist and may be revised as conditions are discovered during construction. Exact locations of replacement trees will be studied during the design phase, taking into account the locations of above- and below-ground infrastructure, sight lines for motorists and pedestrians, and modified sidewalks and pavement within the limits of the Howard Ralston Eucalyptus Tree Rows and the project limits.

Comment City of Burlingame-12

Key View 1 Resource Change (3-27, 3-28)

The City is concerned with the inconsistency in the aesthetics from the mismatch of different species and sizes of trees. The City of Burlingame must be involved in decisions regarding the tree replacement and be allowed to comment on planting species and size.

The DEIR does not provide details related to Caltrans’ commitment to maintain newly planted trees. Stated in the May 5, 2021 Memorandum "Per Departmental Policy, Caltrans does not provide funding or maintenance for highway planting on conventional highways except for functional or safety purposes such as headlight glare screening or erosion control." This is inconsistent with community expectations and input gathered as part of the collaborative community engagement process for the future of ECR.

Response to Comment City of Burlingame-12

As stated in Master Response 2, Caltrans, in continuing collaboration with SHPO, will also consider input from the City of Burlingame and other jurisdictions and community members regarding replacement tree species.

As for maintenance, as noted in the memorandum cited in the comment (EIR/EIS Appendix F, Tree Removal Evaluation and Replanting Plan), Caltrans will maintain the newly planted trees for a three-year plant establishment period and in accordance with a 20-year Long-Term Management Plan. Although Caltrans policy does not typically provide for highway planting and maintenance on Conventional Highways, the Howard-Ralston Eucalyptus Tree Rows are not subject to that policy because they are a State-owned Historic Resource.

Also, please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows.

Comment City of Burlingame-13

3.1.5.4 Avoidance, Minimization, and/or Mitigation Measures VIS-2 (3-37)

As previously stated, the City of Burlingame must be involved in decisions regarding the tree replacement and be allowed to comment on planting species and size. 3.5.

Response to Comment City of Burlingame-13

Please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows.

Comment City of Burlingame-14

Section 3.4 Construction Impacts (Noise)

Every effort should be made to avoid night construction. The DEIR should address efforts to mitigate traffic diversion during construction as detours could potentially be significant. The City offers the following to be added to the DEIR: All traffic detour routes shall be developed in coordination with (approval of) the City of Burlingame.

Response to Comment City of Burlingame-14

Please see response to Comment City of San Mateo-8 for a discussion of the proposed TMP to be implemented during project construction; and response to City of San Mateo-19 for a discussion of construction noise impacts and the proposed public outreach campaign.

5.4.2.5 The Burlingame Historical Society (Jennifer Pfaff, President)

Comment Burlingame Historical Society-1

PG. 10 RE Community Character and Cohesion:

The DEIR Summary of Impacts rates the Built Alternative (both options) as resulting in Moderate change to Community Character.

I think it would be more accurate (assuming the undergrounding option remains viable) to add a qualifier to the assessment, ie: "...moderate change, albeit on a largely temporary basis, while tree replacements of similar scale and like-species have re-established their presence in the Howard Ralston Eucalyptus Tree Rows".

Response to Comment Burlingame Historical Society-1

Thank you for your comment. The discussion in Table S-1: Summary of Impacts and Avoidance, Minimization, and/or Mitigation Measures regarding Community Character and Cohesion has been revised as follows: "The Build Alternative would improve pedestrian infrastructure providing improved physical space for community interactions but would remove character-

defining trees from the Howard-Ralston Eucalyptus Tree Rows resulting in a moderate, temporary change to community character and cohesion."

Comment Burlingame Historical Society-2

PG. 11 RE: VISUAL/AESTHETICS:

The evaluation acknowledges a moderate-high to high degree of visual change, as shown in the various simulation scenarios. Yet the dominant characteristics that define the look and feel of the Tree Rows as one traverses through El Camino Real in Burlingame were not included in this report. This omission is of concern to the Board of the Burlingame Historical Society.

Specifically, these overarching characteristics should emphasize the upright majestic heights of evergreen eucalyptus with tunnel-forming deciduous elms poking through providing color and seasonal interest.

Unfortunately, there is no real ability to properly assess Caltrans mitigation in this report as long as it remains uncertain if the utilities will be buried, as well as the replacement species being unspecified.

There is mention of a big public meeting to select tree types next summer, however without specific parameters that currently (and historically) have defined the Tree Rows, such a meeting has a high likelihood of creating a hodge-podge patchwork of trees that strays far from the Rows' signature characteristics.

Response to Comment Burlingame Historical Society-2

Section 3.1.5.2 of the Draft EIR/EIS under the heading "Existing Visual Resources" and subheading "Visual Character" refers to the outsized scale of the historic eucalyptus trees; the contrast in scale between the large eucalyptus and smaller, newer trees; and the varied appearance of the evergreen and deciduous species of different forms, sizes, and ages. Though described in slightly different terms than in the comment, the EIR/EIS language under "Visual Character" and subsequent sections conveys the height, enclosure, and contrast between the eucalyptus and other trees.

Also, please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows in regard to replacement tree species and other potential mitigation.

Comment Burlingame Historical Society-3

Design modifications: Please include in the DEIR DEIS clarification (and consideration) of exceptions to specifications to include min. allowable width and maximum allowable widths for conformed curb-cuts along the highway, going forward. In most instances, these are residential properties, not business properties, so it should be easy to refine these standards, thereby creating more of a defined sidewalk for pedestrians with a buffer of plantings.

- Burlingame's General and Downtown Specific Plans specify minimizing the number of driveway contours on city streets; these were written specifically with El Camino Real in mind; these policies have helped to preserve extant trees as well as creating space for planter strips for trees wells.

- If a typical driveway is about 12 ft. wide, could Caltrans weigh in allowing a slightly reduced (ie. 10.5 or 11 ft contour). Cumulatively, every cut for a driveway egress negatively impacts the public sidewalk and planter areas; if cuts into the curbs are done judiciously, these could help create space to accommodate additional tree wells in each block, while decreasing impervious materials. Additional communal benefits of a narrower driveway curb contours would be:

decreasing egress/ingress activity (points of conflict) with flowing traffic and oncoming cars, as well as between pedestrians using the sidewalks who must contend with cars entering or exiting properties at various points in each block.

Additionally, please assess defunct, super-wide driveway cuts where planter strips and trees were eliminated decades ago.

There are a number of very old, extremely wide driveways along the highway—a combination of driveways associated with long defunct gas-stations and old apartments where rows of driveways were conjoined, long ago:



(Photo above: Today's Any Car Services- 1 Park Rd. located in a pie-shaped parcel at Park Road, ECR and Peninsula Avenue).

1 Park Road is an example of a long defunct driveway from an early gas station that should be eliminated on El Camino Real, as it has been accessible from Park Road for decades. Caltrans needs to recapture areas like these for new tree-wells and a finished, safe sidewalk with curb.

This same issue is particularly notable in the blocks near Broadway (see the 1100 block – southbound near Carmelita and Broadway). A number of adjacent, conjoined driveways with few remaining curbs have created an enormous treeless swath eliminating what used to function as a safety barrier to traffic.

The result is a poorly defined egress and ingress. Designers/engineers need to examine all similar areas and recapture Caltrans' property which is public property. Please restore your highway curbs, paying particular attention areas where non-essential and/or overly wide driveway widths have morphed into de facto, impervious parking surfaces, some of which overlap with the Caltrans ROW, including the sidewalk. By doing so, new planter strips and tree wells can re-establish themselves and contribute to the Tree Rows, while also helping pedestrians by clarifying auto ingress and egress.

(See comparison photos below: 1970s vs 2021 of the 1100 block southbound, on the westside north of Carmelita Avenue. Note that the properties shown are the same in both photos, but the landscaping and original tree wells have been paved over for de Facto parking lots).



1970s



2021

Careful design and planning of the new infrastructure here and in similar areas should strive to restore long gone curbs, planter strips and trees to mitigate tree removals, elsewhere.

Finally, please define driveway contour standards for this historic stretch, so that widths can be reduced to that which is necessary for egress clearance of a vehicle. These standards need to be

uniformly followed for encroachment permits, keeping in mind that each additional or too-wide driveway effects the safety of pedestrians, and reduces opportunities for new tree wells. This information should be conveyed to the Burlingame Public Works Department so applicants know the standards as they relate to (re-)establishing new tree plantings areas, while safeguarding older plantings.

In any case, the common goal should be to create safer driveway/sidewalk egress while also facilitating new tree wells within the Howard Ralston Eucalyptus Tree Row district.

Response to Comment Burlingame Historical Society-3

During the design phase, the existing Caltrans right-of-way will be re-established through detailed surveys of property boundaries. Caltrans plans to maintain driveways to ensure locals and property owners can access their private and commercial driveways. It is not Caltrans policy to eliminate any driveway access. However, driveway design will be reviewed on a case-by-case basis and select driveways may be narrowed to current standards if they exceed current design standards. This may occur in cases where driveways have been previously widened without proper Caltrans encroachment permits. The Highway Design Manual (205.3 Urban Driveways) states that: "The width of single residential driveways should be 12 feet minimum and 20 feet maximum. The width of a double residential driveway such as used for multiple dwellings should be 20 feet minimum and 30 feet maximum. The width selected should be based on an analysis of the anticipated volume, type and speed of traffic, location of buildings and garages, width of street, etc." The policy on commercial driveways in the Highway Design Manual considers more varied circumstances and accommodates wider widths.

Areas within Caltrans' right-of-way not proposed for sidewalks or driveways will be considered for planting, within the constraints of utility infrastructure, the clear recovery zone, and sight distance requirements of the Highway Design Manual.

Comment Burlingame Historical Society-4

(cont. VIS-1) Minimization measures incorporated:

SOIL AMENDMENTS:

Regarding actual plantings and growing conditions—There needs to be a commitment to add soil amendments and various planting aids to all planter strips, not just in those areas damaged during construction; this was our understanding during the Task Force meetings, as it can work together with irrigation to improved vigor of extant trees should contribute to a generally healthier grove going forward.

Response to Comment Burlingame Historical Society-4

Please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows regarding soil amendments.

Comment Burlingame Historical Society-5

VIS-2 –

Is the intention to replace all (300-350) trees removed trees with new replacements somewhere in the Grove or only those considered contributory? There are about 600 trees within the Howard Ralston Tree Rows and the overarching goal should be to replace each of the removed trees along the Highway ROW within the historic boundaries, with special emphasis on closing up the treeless gaps that have existed in certain areas for a number of years.

“REPLACEMENT PLANTING SPECIES AND SIZE TO BE DETERMINED DURING FINAL DESIGN.”

The above statement from the DEIR/DEIS, however, makes no commitment to the replanting of historically relevant, appropriately scaled species that comprise the Howard Ralston Eucalyptus Tree Rows. The preferred dominant species was recommended during the ECR Task Force sessions (at least 70% of which should be elm and eucalyptus--ideally roughly in equal proportion, with no more than 30% “other” types to provide species diversity).

The Tree Rows themselves ARE the HISTORIC RESOURCE. So, how can a mitigating strategy, MOU, and subsequent treatment plan be prepared and submitted to SHPO lacking these specifics?

NOTE: It remains vitally important that the Howard-Ralston Eucalyptus Tree Rows (a Historic designed landscape) retain its listed status in the National Register of Historic Places.

National Parks Service Bulletin 36: “Protecting Cultural Landscapes – Planning, Treatment and Management of Historic Landscapes” should be a guide going forward

-a few excerpts follow:

Site Analysis: Integrity is a property's historic identity evidenced by the survival of physical characteristics from the property's historic or pre-historic period. The seven qualities of integrity are location, setting, feeling, association, design, workmanship and materials. On ground, evidence should then be studied, including character-defining features, visual and spatial relationships. By reviewing supporting materials from historic research, individual features can be understood in a systematic fashion that show the continuum that exists on the ground today.

Treatments for Cultural Landscapes:

For all treatments, the landscape's existing conditions and its ability to convey historic significance should be carefully considered. For example, the life work, design philosophy and extant legacy of an individual designer should all be understood for a designed landscape...prior to treatment selection....

Response to Comment Burlingame Historical Society-5

Caltrans greatly appreciates the time and effort that the Burlingame El Camino Real Task Force, Burlingame Historical Society, and the City of Burlingame have committed to this project in order that we can reach our goal to maintain the NRHP listing of the Howard-Ralston Eucalyptus Tree Row while still meeting the project needs.

Please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows regarding the number, location, and potential tree species to be replanted.

Comment Burlingame Historical Society-6

Without specific guidelines with regard to tree species and target ratios specifying dominant and secondary tree types, it will become challenging, if not impossible for both Caltrans, and the City of Burlingame to uniformly and properly follow a treatment plan in keeping with SHPO defined mitigation strategies.

Furthermore, it cannot be left up to adjacent property owners/developers to select tree types for this historic resource, yet this is precisely what will happen over time if there is too broad of a tree palette. The result will transform a visually largely uniform canopy into a hodgepodge collection of various species, sizes and shapes that will not meet even minimal standards required to remain listed in the Register.

There needs to be an agreement put in place to periodically document the number of trees in the Rows-- their health, structure, need of trimming/pruning, etc. Moreover, this should be used to confirm that the plantings in the tree rows have retained their agreed upon, targeted ratios in each block from Peninsula to Ray Drive. This is the only way to re-establish a similar character-defining canopy over time.

Developing a Preservation Maintenance Plan and Implementation (NPS Bulletin36):

Throughout the preservation planning process, it is important to ensure that existing landscape features are retained. Preservation maintenance is the practice of monitoring and controlling change in the landscape to ensure that its historic integrity is not altered and features are not lost. This is particularly important during the research and long-term treatment planning process. To be effective, the maintenance program must have a guiding philosophy, approach or strategy; an understanding of preservation maintenance techniques; and a system for documenting changes in the landscape.... For vegetation, the preservation maintenance program would also include thresholds for growth or change in character, appropriate pruning methods, propagation and replacement procedures.

(cont.) VIS-2-

As concluded on page 3-20 (Viewer Response) and as evident in the simulations developed by CalTrans, removal of much of the tree canopy reveals a stark visual change in relation to the typical views experienced by pedestrians and commuters. Notably there will a diminished canopy and far less shade, thus more glare through the windshields of cars. Nearby residents in adjacent properties will likely experience more bright light reflected from the cars. At night, there will likely be a significant increase in illumination emanating from residences (and limited commercial properties) across the highway effecting residents on both sides. For this reason, it is essential to incorporate large, regularly spaced evergreens (ie. the lemon-scented eucalyptus) into the replacement plan that will contribute to the reforestation of a contiguous tree canopy and rehabilitate the visual buffer over time.

Response to Comment Burlingame Historical Society-6

Thank you for raising these important considerations, which will inform the development of the Long-Term Management Plan. It will not be left up to only adjacent property owners or developers to select replacement tree types; instead, the selection will be based on consultation with SHPO, taking into account any recommendations from various stakeholders such as the Burlingame El Camino Real Task Force and Burlingame Historical Society, and a community workshop. Please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows.

Comment Burlingame Historical Society-7

VIS-3-

There are a number of extant replacement elms that still need irrigation!! Irrigation for the new trees is essential, however, there should be a commitment to include irrigation of the young extant elms that have been planted a few years ago, but have not thrived due to poor soil and lack of water. Please commit not only to irrigating the new trees, but also to the irrigation of the extant elm saplings that still need water, and please amend the soil so they can really thrive and start growing; Years of drought have been hard on them and it's possible they won't make it, and you'll end up having to replace them anyhow.

Response to Comment Burlingame Historical Society-7

Please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows regarding irrigation and soil amendments.

Comment Burlingame Historical Society-8

VIS-4 – Compliance? Who shall be responsible (from Caltrans) for follow-through on possible damaged and missing trees, irrigation systems, regular pruning, etc. Unfortunately, tree replacements and other maintenance follow-through has not worked at all (for the past 25 years).

We need to have an agreement stating that new developments along the highway include sufficient trees and planter strips (with the appropriate tree species, and in-ground irrigation). This needs to be codified with Public Works and Parks, and monitored so that we don't develop new gaps in the canopy, unapproved replacement species, or that we unnecessarily lose new and/or established trees.

Response to Comment Burlingame Historical Society-8

As noted in Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows, Caltrans Maintenance would assume responsibility for the Tree Rows after the three-year plant establishment period, unless a Maintenance Agreement is drafted with local cities or San Mateo County. New developments along SR 82 in Burlingame would be subject to any applicable City requirements and/or approvals.

Comment Burlingame Historical Society-9

VIS-5- The 20-year commitment is quite laudable, and really should be helpful towards the goal of re-establishing a mature, healthy Grove. However, the same questions and concerns remain regarding CalTrans ability and commitment to follow-through, so that replacements or other necessities happen in a timely manner. The tree rows are a living resource that require care and attention, or they will be lost, one tree at a time, resulting in demolition by neglect.

New tree tags are needed marking each tree that will create a baseline for periodic visual tracking. Tracking should be conducted by foot, as Caltrans has done in the past, and recorded. It is essential to establish a regular monitoring program where the aerial maps showing tree location and type become part of the historic record for SHPO, for the knowledge of CalTrans Cultural Resources and Maintenance and for the City of Burlingame and Burlingame Parks Department, and Burlingame Historical Society, where health, structural issues, missing or damaged trees can be noted for regular replacement, followed by timely tree replacement.

Finally, what is the plan in year 21 if a tree disappears, is vandalized run over or simply dies. We need an agreed-up process, who reports to whom, which department is responsible for following through promptly on the replacements, etc. or we will find ourselves with a neglected historic resource that disappears one tree at a time. The MOA needs to “futureproof” the legacy of the Tree Rows.

Response to Comment Burlingame Historical Society-9

Please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows regarding the Long-Term Management Plan.

Comment Burlingame Historical Society-10

CULTURAL RESOURCES

CUL-2, CUL -3

Since the build alternative involves removal of approximately 250 trees considered contributory to the Resource, it would be important for future generations to document and photograph the resource before the project begins (HABS/HALS etc.). In this same vein, the Howard-Ralston Eucalyptus Tree Rows is best experienced from a vehicle (125 years ago, it was in a horse and

buggy). For this reason, still photos, alone, cannot convey the essential atmospheric, 3-dimensional feel.

We'd suggest that a film (video) also be made from a car that documents what a drive north, and southbound feel like through the historic tree canopy, because it was this tunnel forming view of the majestic trees that impressed visitors so much, promoting early tourism and investment in the area.

Finally, there should be a tangible educational component to this project, as part of mitigation, that conveys the long history of the grove in this community. This could be done with interpretive signs but also in the form of a "history walk" with metal plaques embedded into the new sidewalks. In this way, the history and quality of life reflected by the existence of the Tree Rows will remain relevant while the public patiently waits for the saplings to grow that recreate the original grove atmosphere.

Response to Comment Burlingame Historical Society-10

Please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows regarding potential documentation as part of project mitigation. A historic walking tour has been included in the MOA. In addition, please see Appendix D for a list of cultural mitigation measures and Appendix H of this document for the MOA.

Comment Burlingame Historical Society-11

HYDROLOGY AND FLOODPLAIN / STORM WATER RUNOFF

There does not seem to be a mention of the importance of having the trees in this particular area of Burlingame, which has 7 creeks running through it that can cause localized flooding in certain years. The tree roots are able to help absorb runoff that accumulates from the geographical slope of hillier areas coming off of the west side. Together with the upgraded drainage, new trees will be crucial to minimizing excess water on the highway.

Response to Comment Burlingame Historical Society-11

Trees and other vegetation do not absorb runoff at levels that could reduce runoff or localized flooding during storm events. Storm drain facilities are typically designed for a worst-case scenario assuming saturation of the ground. Design of storm drain facilities does not consider evapotranspiration in reducing the volume of excess roadway runoff during storm events.

Comment Burlingame Historical Society-12

CLIMATE CHANGE AND POLLUTION:

The Tree Rows have created a microclimate along the highway for more than a century. The canopy-sheltered quality of the Grove helps to moderate the air temperature, winds, and particulate matter from vehicle exhaust. The shade canopy also reduces the heat generated by the asphalt highway.

Response to Comment Burlingame Historical Society-12

While the existing trees within the project limits may moderate the air temperature and winds, and contribute to a reduction in particulate matter along El Camino Real within the project limits, there is an abundance of city trees and shrubs in a 1-mile area surrounding the project limits that would be unaffected by the proposed project. In addition, replacement trees would also provide these benefits at maturity.

Comment Burlingame Historical Society-13**BIOLOGICAL ENVIRONMENT:**

Though the report mentions the presence of various bird species that forage and nest in the Tree Rows, it fails to mention the importance of the tall stature trees, predominantly the eucalyptus, known to provide habitat for migrating monarch butterflies.

In December 2020, the Monarch butterfly became a candidate for listing under FESA. On July 16, 2021, The High Speed Rail Authority released a revised DEIR with revisions to their planned Millbrae Station a mile away from The Howard Ralston Eucalyptus Tree Rows. The revisions produced a reduced project footprint variant, so as to lessen impacts on the Monarch species.

“The presence of the monarch butterfly is assumed in the area, based on historical records and existence of suitable habitat to the species” (July 16, 2021, Serge Stanich, Director of Environmental Services for HSR, as related to nearby eucalyptus groves along California Drive).

This ECR Renewal project will remove roughly 250 eucalyptus trees, substantially more than the anticipated tree removals near the future Millbrae HSR station, in roughly the same geographical area (Cumulative impacts). Considering the proximity to the Millbrae HSR station, one might consider that the Eucalyptus Tree Rows in Burlingame also contribute to Monarch Butterfly habitat.

Curiously, under the Build Alternative, the DEIR makes no mention of said tree removals having any adverse impacts, nor how to best mitigate the habitat loss for the birds, bees, and other insects, and there is no mention of butterflies in the area at all:

“No avoidance, minimization or mitigation is required.”

Considering the large number of anticipated eucalyptus removals in the Tree Rows, it would seem as if what are likely to be significant impacts on bird, bee and other insect habitat(s) should be looked into more thoroughly than what has been presented in this report.

Response to Comment Burlingame Historical Society-13

Based on a search of the California Natural Diversity Database (CNDDDB) for the California overwintering population of monarch butterfly, the nearest occurrence of the species is seven miles from the project footprint. The iNaturalist site listed a recent observation (May 2021) approximately one mile west of the project footprint. The next two nearest, documented occurrences are four miles south of the project footprint in Belmont. Based on these searches, monarch butterflies are not expected to be present in the project limits. Overwintering populations prefer basswoods, elms, sumacs, locusts, oaks, Osage-oranges, mulberries, pecans, willows, cottonwoods, and mesquites. Breeding monarch habitats can be found in agricultural fields, pastureland, prairie remnants, urban and suburban residential areas, gardens, trees, and roadsides – anywhere where there is access to larval host plants. Elms have been observed within the project limits, but larval host plants and adult food plants have not. Additionally, during the design phase Caltrans will choose pollinator plants that may be incorporated into the plant establishment period.

As described in Draft EIR/EIS Section 3.3, the Build Alternative would not result in adverse effects to biological resources and no avoidance, minimization, or mitigation measures are required for the monarch butterfly.

5.4.2.6 The Burlingame Historical Society (email) (Jennifer Pfaff, President)

Comment Burlingame Historical Society (email)-1

I realized today as I drove along the highway, that I forgot to include the issue of removal / grinding of stumps and roots. Perhaps this goes in the MOA or Maintenance agreement, but I figured best to mention it, now.

As you probably are aware, there are still a number of stumps from previous removals that were never ground out, it looks very bad, and also renders those areas defunct as far as contributing visually or otherwise, and so I'd just like to make sure that this is also included. This has been an ongoing issue, and one that will continue beyond the 20 years.

Thanks, and I'm sorry I neglected to remember this on my other document.

Response to Comment Burlingame Historical Society (email)-1

Thank you for your comment. A replanting plan will be developed during PS&E in coordination with SHPO, the City of Burlingame, and the Burlingame Historical Society, which will include removal of existing stumps from previous removals in areas requiring replanting.

5.4.2.7 Burlingame Friends of the Trees (Brian Benn)

Comment Burlingame Friends of the Trees-1

1. Place Utilities Underground: The Design Option to Underground Utilities as noted in section 2.1.1.1 is strongly preferred, assuming the subsurface utilities will not be vulnerable to flooding.

Response to Comment Burlingame Friends of the Trees-1

The commenter's support for the design option is noted.

Comment Burlingame Friends of the Trees-2

2. Maintain >70% Elm and Eucalyptus Species: Replacement tree species and target ratios should be specified now as recommended during the ECR Task Force sessions – that at least 70% should be elm and eucalyptus with no more than 30% other species. The Task Force recommendations were carefully considered to emphasize historically-relevant, appropriately-scaled species consistent with the current visual aesthetic.

Response to Comment Burlingame Friends of the Trees-2

Please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows regarding replacement tree species and ratios.

Comment Burlingame Friends of the Trees-3

3. Maximize the Canopy: Minimize tree removals and, after necessary removals, maximize the number and health of replacement trees by:

- Restoring planter strips that have been paved;
- Minimizing the number and width of driveways;
- Creating natural stormwater infiltration areas to nourish trees;
- Adding soil amendments and irrigation for both replacement trees and those to be preserved; and
- Providing long-term monitoring and maintenance for the trees, in accordance with the target ratio of species specified by the Task Force.

Response to Comment Burlingame Friends of the Trees-3

Please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows and the response to Comment Burlingame Historical Society-3.

Comment Burlingame Friends of the Trees-4

4. Traffic Lights for Pedestrian Safety: For pedestrian crossings identified for hybrid beacons (Bellevue Avenue, Willow Avenue and Palm Drive), use standard traffic lights instead of hybrid beacons. From experience on ECR in Millbrae, drivers are routinely confused and drive through the flashing red lights after they think the pedestrians have crossed their side of the road. Hybrid beacons create a hazardous situation for pedestrians as many drivers fail to yield appropriately.

I appreciate Caltrans' attention to this project and consideration of my comments.

Response to Comment Burlingame Friends of the Trees-4

Pedestrian hybrid beacons are the standard crossing enhancements proposed for El Camino Real. An FHWA study published in 2010 found that pedestrian hybrid beacons can reduce pedestrian crashes by 69 percent and total crashes by 29 percent (FHWA 2010). Because pedestrian hybrid beacons remain dark until activated, they can help increase driver attention to pedestrians crossing the roadway, and can reduce rear-end collisions. The pedestrian hybrid beacon's red signal indication removes any judgment from the motorists and requires a complete stop. Pedestrian hybrid beacons provide a clear message that motorists must stop and allow pedestrians to cross the street. Motorist compliance with the requirement to yield has been shown to exceed 90 percent at pedestrian hybrid beacons.

All existing pedestrian signals within the project limits are proposed to be upgraded to touch-free APS and CPS. For those unmarked crossings that cross driveways that enter/exit within an intersection, crossings are proposed to be signalized with touch-free APS and CPS. Signalized driveways are proposed to be modified from 3-section signal heads (green, yellow, and red lights) to 1-red section heads (right in and right out only).

5.4.2.8 Lynn Israelit (Burlingame Traffic, Safety, and Parking Commissioner)

Comment Lynn Israelit-1

There are several blocks near the ECR/Broadway intersection where there are almost no trees or sidewalk planters. It appears that the apartment buildings there have paved over the planting area and have been using it for either parking or the equivalent of a super-wide driveway (ie, at least 2-3 lanes wide). As part of the renovation of this ECR corridor, it will be important to return those public areas to use by the public, not the adjacent landowners. Planter strips should be reinstated and trees must be replanted on these blighted, tree-less blocks.

Response to Comment Lynn Israelit-1

Please see the response to Comment Burlingame Historical Society-3.

Comment Lynn Israelit-2

I am VERY concerned the Caltrans keeps stating that tree types will be selected based on sustainability and climate change issues. While I understand that many of the heritage eucalyptus trees will need to be removed for this project and that trees will be replaced, I don't think you are hearing that the community here wants trees that are of similar majestic height. There are various reasons for that need:

1. Most importantly, it is because the very character of this tree corridor is integral to our town's identity. Though it will be irrevocably changed by the ECR project, Burlingame residents still adamantly want replacement trees of a similar stature.
2. The height of the trees blocks sun during commuting hours and makes a very big difference in driving safety.
3. Tall trees also provide privacy and screening for the many apartment dwellers who live facing El Camino Real.
4. Your landscape designers may feel that other types of trees will look great and thrive along this stretch of highway, but they should not be choosing lower height trees with a completely different canopy and feel. That will not be giving us back a landscape like what is being removed and that is not what Burlingame wants. Caltrans doesn't have the right to make that choice for us. I can't emphasize that enough.

Response to Comment Lynn Israelit-2

Please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows, which includes discussion of critical factors in tree selections including scale, form, and community input.

Comment Lynn Israelit-3

Thanks for listening, and I look forward to future planning sessions. Please add my name and email address to future

Response to Comment Lynn Israelit-3

Thank you for your comment. Your contact information has been added to the project mailing list.

5.4.2.9 Kat Wortham

Comment Kat Wortham-1

I am writing as an individual aligned with the comments from Resilient El Camino Real. I utilize El Camino Real from Burlingame to San Jose almost every single day.

I believe that the existing EIR is inadequate, and that roadway configuration options including the following should have been studied and included as alternatives in the environmental impact report:

1. Transit-only lane in either the northbound or southbound direction, accompanied by a 4-to-3 lane road diet
2. Shared use path for bicyclists

I respectfully request that the above alternatives be evaluated, and that a written response be provided.

Response to Comment Kat Wortham-1

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

Comment Kat Wortham-2

Further I would like to see this body answer the questions that Resilient ECR have put forward. They are as follows:

In the EIR, no TORR nor TEPA is included. There is no collision analysis made available to the public, if one was conducted. Please inform the public as to the existence of a TORR or TEPA. Please comment on the existing collision rates along the corridor in the project area, and how these rates compare to existing rates on similar roadways in the state of California. If a collisions analysis was conducted, please define the impact of the alternative on collisions of the following types:

- a. Midblock collisions
- b. Collisions at intersections
- c. Collisions specifically involving ingress/egress from driveways, whether midblock or near intersections
- d. Collisions involving bicycles
- e. Collisions involving pedestrians

Response to Comment Kat Wortham-2

According to the Traffic Accident Surveillance and Analysis System (TASAS), between October 1, 2016 and September 30, 2019 (the most-recent available 3-year period), there were a total of 104 accidents along the stretch of El Camino Real within the project limits. Of these, 1 was fatal and 63 involved injuries. These accident rates were greater than the corresponding average accident rates for similar facilities statewide. A review of the TASAS data provided for this segment of SR 82 appears to indicate collisions are mostly due to driver error (a high number of broadside and rear-end type collisions, with the primary collision factors being failure to yield and speeding).

While there are no safety improvement recommendations from previous investigations for this segment of SR 82, the project will give Caltrans an opportunity to address safety along the corridor while still adhering to the project purpose and need and the project scope. Decision sight distances (the distance at which drivers can detect a hazard or a signal in a cluttered roadway environment) and stopping sight distance (the minimum sight distance required along a roadway to enable a vehicle traveling at or near the design speed to stop before reaching a stationary object in its path) will be analyzed by licensed traffic engineers and addressed during the design phase. Further, the implementation of new pavement, pavement markings, pedestrian crossing signals, ADA improvements and drainage systems, and lane lines as part of the project will increase safety along El Camino Real within the project limits.

Comment Kat Wortham-3

To what extent will vehicle miles traveled (VMT) be reduced in each of the alternatives (road diet and existing lane configuration) in accordance with state goals?

Response to Comment Kat Wortham-3

As stated in Section 4.5.3.1 of the Draft EIR/EIS, the project would not increase the number of travel lanes on El Camino Real. Therefore, no increase in vehicle miles traveled (VMT) would occur as result of the Build Alternative, either with or without inclusion of the design option.

While some greenhouse gas (GHG) emissions during the construction period would be unavoidable, no increase in operational GHG emissions is expected. Additionally, the project's improvements to pedestrian facilities in the corridor are consistent with Caltrans' Strategic Plan to support active transportation modes, such as walking and transit use.

The Road Diet Alternative, as described in Section 2.1.5, was considered during environmental scoping and early in the PA&ED phase. This alternative was eliminated by the PDT for reasons, including potentially substantial increases in vehicle delays and congestion during the PM peak hour in the cities of Burlingame and San Mateo (Caltrans 2020a). This alternative would also have resulted in reduced speeds and degradation of level of service at 24 intersections within the project limits in the AM peak hour and 32 intersections in the PM peak hour.

Also, please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

Comment Kat Wortham-4

How does this project contribute to Caltrans' stated goals of achieving increased shifts to non-auto transportation?

Response to Comment Kat Wortham-4

During project implementation, all existing bus stops within the project limits will be replaced in kind. Also, in January 2021, the PDT consulted with SamTrans, the transit service provider, regarding transit operations along the corridor. Caltrans learned that SamTrans is beginning a study in the corridor, the results of which would not be available for the Draft or Final EIR/EIS. During the design phase, Caltrans will coordinate with SamTrans to identify priority locations for any additional transit enhancements (such as bus shelters). In addition, pedestrian improvements included in the project will support transit ridership by increasing pedestrian access to transit stops by providing ADA ramps and sidewalks would improve access to transit stops.

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

Comment Kat Wortham-5

How many additional street trees are expected to be preserved by not completing the sidewalk network between Bellevue and Floribunda Avenues, compared to not adding a sidewalk, assuming that all other roadway repaving activities called for in the preferred build alternative are still implemented? How many trees are being preserved in order to justify actively choosing to endanger pedestrian safety by failing to complete the sidewalk network on the corridor?

Response to Comment Kat Wortham-5

As described in Chapter 2 of the Draft EIR/EIS, all existing sidewalks within the project limits from East Santa Inez Avenue in the City of San Mateo to Dufferin Avenue in the City of Burlingame would be upgraded as part of the project. There are currently no pedestrian facilities along the one-block segment of southbound El Camino Real between Floribunda Avenue and Bellevue Avenue, nor are there any residences or businesses that front this segment of the roadway.

There are 21 trees along this portion of El Camino Real, 18 of which contribute to the Howard-Ralston Eucalyptus Tree Rows. It is currently anticipated that 19 of the trees in this stretch, and 14 of the contributors, may be retained by not constructing a new sidewalk. The original eucalyptus trees that Caltrans anticipates preserving in this one-block segment represent about 15% of the total number of original eucalyptus trees anticipated for preservation in the project corridor.

During the planning phase for the project, the PDT decided to balance the need to avoid and minimize impacts to the historic trees between Floribunda and Bellevue with pedestrian benefits. Consequently, the project design will include a sidewalk gap and shortening of the roadway crossing distances as well as other pedestrian crossing improvements at both Bellevue Avenue and Floribunda Avenue. Improvements proposed for these two intersections include the installation of high-visibility crosswalks, flashing beacons, and signs prohibiting pedestrian crossings at the intersection corners without sidewalks.

Comment Kat Wortham-6

Please comment on the draft San Mateo County Bicycle Master Plan: https://static1.squarespace.com/static/5dcdea09b844e23fcd271961/t/60244f9c0c69a804fa2533b1/1612992562693/CCAG+CBPP+Public+Draft+02.10.2021_lowres.pdf. On page 44 of the plan, in the Countywide Bicycle Backbone Network Project List listed as Project ID 7.03, a bicycle facility of undetermined type is called for. This includes the entire section of El Camino that this environmental impact report is supposed to encompass. In the EIR, Caltrans wrote, "The Draft San Mateo Countywide Bicycle and Pedestrian Plan does not include designated bicycle facilities along the roadway within the majority of the project limits." Was Caltrans incorrect when it claimed consistency with the plan in the Draft EIR? Will Caltrans please view page 44 of the draft report, and notify the public if it has incorrectly assessed the draft plan? Will it please issue a correction in the environmental document that the Draft San Mateo County Plan does, in fact, list as a project with a unique project id, a bicycle facility of undetermined type in the entirety of the project area, and that a bicycle facility is intended to be studied on the corridor? How is Caltrans' refusal to study bicycle facilities on this stretch as part of the EIR consistent with the San Mateo County Draft Bicycle Master Plan?

Response to Comment Kat Wortham-6

This comment refers to a project listed in the Countywide Bicycle Backbone Network Project List in the Draft San Mateo County Bicycle Master Plan that includes the section of El Camino Real being evaluated in this EIR/EIS. As stated, the project (ID 7.03) includes the section of El Camino Real from North Road to Murchison Drive and designates the "Recommended Bikeway" as an "Undetermined Facility Type". However, the Countywide Bicycle and Pedestrian Plan map (available here: <https://tooledesign.github.io/F0066-San-Mateo-CCAG/community/>) notes the corridor as "No Recommended Upgrade". No changes to the Draft EIR/EIS are necessary.

Also, please refer to Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

Comment Kat Wortham-7

Will induction loop sensors capable of detecting bicycles be used for vehicle detection at signals?

Response to Comment Kat Wortham-7

Loop detectors that can detect all types of traffic (including trucks, cars, buses, motorcycles, and bicycles) are under consideration for installation along El Camino Real within the project limits.

Comment Kat Wortham-8

Is it the intent of the project to upgrade signal systems at the intersections? Please list all planned upgrades, and whether any signals will be relocated at any intersections. We ask this question to determine whether or not signals can be placed differently in order to accommodate safer intersections for bicyclists.

Response to Comment Kat Wortham-8

All existing pedestrian signals within the project limits are proposed to be upgraded to touch-free APS and CPS. For those unmarked crossings that cross driveways that enter/exit within an intersection, crossings are proposed to be signalized with touch-free APS and CPS. Signalized driveways are proposed to be modified from 3-section signal heads (green, yellow, and red lights) to 1-red section heads (right in and right out only).

Comment Kat Wortham-9

El Camino Real in the project area is a residential street (has residential uses). Please describe in detail how cyclists, under the current no build and preferred build alternatives, should cycle to and from destinations on El Camino Real. Is it safe for them to bike on the roadway? Is it safe for them to bike on the sidewalk? What is the collision rate on this stretch of the corridor, and does it justify Caltrans not studying the corridor for bicycle safety?

Response to Comment Kat Wortham-9

Implementation of the project would not change existing allowed use of El Camino Real within the project limits to bicyclists or pedestrians. While Caltrans does not have a policy regarding use of bicycles on sidewalks, local ordinances in the cities of Burlingame and San Mateo restrict the use of sidewalks by bicyclists under certain conditions. However, as described in the response to Comment Kat Wortham-2, the implementation of new pavement, pavement markings, drainage systems, and lane lines as part of the project would increase safety along El Camino Real within the project limits for all users.

Comment Kat Wortham-10

Please provide recent (less than 2 years old) bicycle counts on El Camino Real that justify not studying the roadway for bicycle improvements.

Response to Comment Kat Wortham-10

This project will improve the roadway for bicyclists and other users by installing new pavement, pavement markings, drainage systems, and lane lines. Intersection crossings for pedestrians and bicyclists will also be enhanced. Bicycle-specific data is only collected if a decision is being made to install bicycle lanes. Because adding bicycle lanes is outside the scope of this project, no bicycle-specific data was collected during project planning.

Also, please see the response to Comment Kat Wortham-9 and Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

Comment Kat Wortham-11

Please provide recent (less than 2 years old) transit rider and transit speed data that justifies not studying a transit-only lane given 2040 congestion growth scenarios.

Response to Comment Kat Wortham-11

The project as proposed and evaluated meets the purpose and need and project objectives listed in Chapter 1 of the Draft EIR/EIS. When Caltrans met with SamTrans on January 4, 2021 to discuss the project, Caltrans learned that SamTrans is in the early stages of studying their transit service operations in the corridor. During the design phase, Caltrans will coordinate with SamTrans to identify priority locations for additional transit enhancements (such as bus shelters).

Also, please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

Comment Kat Wortham-12

In the Caltrans Mode Share Action Plan 2.0 (<https://dot.ca.gov/-/media/dot-media/programs/sustainability/documents/caltransmodeshareactionplan20final-002.pdf>), the agency explicitly stated under its first goal (1.1) that it intends to “Support district efforts to invest State Highway Operation and Protection Program (SHOPP) or other funds (Interregional Transportation Improvement Program (ITIP), Active Transportation Program (ATP), Senate Bill 1 (SB 1) competitive programs, etc.) in active transportation facilities on, across, or adjacent to the State Highway System (SHS). How does this environmental impact report take into account the needs of bicyclists, who represent a crucial active transportation contingent on the corridor?”

Response to Comment Kat Wortham-12

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives. The project is consistent with the Caltrans Mode Share Action Plan through the inclusion of pedestrian improvements and improvements at intersections for bicycle traffic crossings.

Comment Kat Wortham-13

Caltrans had adopted a mode share goal of 4.5% trips made by bicycle by 2020. Did Caltrans meet this goal, and how does this project help Caltrans move towards its stated goal?

Response to Comment Kat Wortham-13

Your comment is related to Caltrans' goal to increase percentage of bicycle mode share. It should be noted this is a State-wide goal, not one for individual projects. This goal was not met. The installation of new, designated bike facilities on El Camino Real is not within the scope of the proposed project. However, the project focuses on correcting roadway deficiencies and improving safety in the project corridor, which will improve El Camino Real for all users, including pedestrians and bicyclists. Also, please see the response to Comment Kat Wortham-12.

Comment Kat Wortham-14

Does Caltrans have a public transportation mode share goal? If so, how does this project help Caltrans meet that goal? Are there any elements in the project that will help increase transit ridership?

Response to Comment Kat Wortham-14

While Caltrans does not have a specific mode share goal, Caltrans' 2020 - 2024 Strategic Management Plan includes a goal of enhancing and connecting the multimodal transportation network through several strategies. Those strategies include improving network operations and investing in networks for walking, cycling, transit, and multimodal trips. The project includes substantial upgrades to the pedestrian infrastructure within the project limits that would promote walking, aligning with Caltrans' stated goal. In addition, pedestrian improvements included in the project will support transit ridership by increasing pedestrian access to transit stops.

5.4.2.10 Diane Condon**Comment Diane Condon-1**

May I ask a question, since I cannot obtain the answer in the documents presented to the public. Is it true that only 30% of the existing Eucalyptus Trees will remain? Of those remaining most are the ones recently planted that are not Blue Gum and are rather dismal?

I would appreciate a clear answer on this.

Response to Comment Diane Condon-1

While exact numbers of specific types of trees potentially removed as part of the proposed project are not available at this time, the Tree Removal Evaluation and Replanting Plan provided in Appendix F of the Draft EIR/EIS provides a summary of the anticipated tree removals. As noted in the Plan, approximately 250 trees that contribute to the Howard-Ralston Eucalyptus Tree Rows are anticipated for removal in the proposed project. Approximately 391 trees are considered contributors today. Final determinations for tree removals are being developed with the input of an independent arborist and may be revised as conditions are discovered during construction. However, Caltrans has prepared assessments of trees in order to determine likely removals and study the environmental impacts. The exact trees to be removed requires coordination among design engineers, landscape architects, and the State Historic Preservation Officer, and such coordination cannot occur until the design phase.

Posters on the DED Microsite (<https://deavpm.wixsite.com/el-camino-real>) provide additional detail about the types of trees, their condition, and anticipated removals/replacements in the project corridor. As noted on these posters, approximately 250 of the trees original to the tree rows remain today. While final determinations have not yet been made, Caltrans anticipates that approximately two-thirds (more than 60%) of these original trees would be removed with the project.

Comment Diane Condon-2

Based on your email, we have only two days to review this AND research AND express an opinion. Why wasn't this made available earlier?

Also, I am very concerned about the display at Burlingame High School. The corner of Oak Grove & Carolan had a sign saying the " area was closed for a School event."

I later found out that it was in the stands. Poor communication. Even the police department didn't know where it was except at "Burlingame High School."

Cal Trans seems bent on doing everything to not include the public and to keep the response small.

This is very unfortunate and promotes lack of faith in Cal Trans. This entire episode is so against the mission statement of Cal Trans.

Response to Comment Diane Condon-2

As described in Chapter 5 of the Draft EIR/EIS, public outreach for the project has been ongoing since January 2020.

Outreach and public notification occurred to advertise the availability of the Draft EIR/EIS. Public input on the project was solicited during the review period for the Draft EIR/EIS, which lasted from June 10, 2021 to August 2, 2021. The public was notified of the availability of the Draft EIR/EIS by a number of methods, including postings on the Caltrans website, local newspapers, and an emailed announcement to interested agencies and individuals. During the review period, Caltrans held a virtual public hearing on Wednesday, July 14, 2021, and an in-person public hearing on Friday, July 16, 2021 to share information about the project and collect comments on the Draft EIR/EIS from interested parties.

5.4.2.11 Davis Turner

Comment Davis Turner-1

I think it is great that Caltrans is considering a much-needed ECR renewal. With sidewalks and roads cracking and a massive increase in pedestrian accidents along the corridor, it is time changes are made to ECR in Burlingame and San Mateo. As a frequent rider of SamTrans, particularly the ECR, I find it shocking that in none of the plans studied and included are proposals for a transit-only lane in either direction. The ECR is SamTrans' busiest route and suffers from major delays due to traffic and poor road conditions, wrecking havoc on the system. Transit-only lanes would increase average speed for buses and improve rider experience—and many proposals in the past have shown that car traffic would not be made worse. My own SamTrans experience on the ECR is very mixed—seldom are buses not delayed, and crossing the street to go south is always a struggle against time with long lights and speeding cars (sometimes through red lights) prompting a slower walk to keep eyes on the road.

Response to Comment Davis Turner-1

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives regarding transit-only lanes and pedestrian improvements.

Comment Davis Turner-2

Further, Caltrans should have considered another shared-use path that bicyclists can use. The current road has no cycling infrastructure in place aside from small sidewalks which I have tried to bike on and it is certainly not a pleasant experience.

Response to Comment Davis Turner-2

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives regarding bicycle improvements.

Comment Davis Turner-3

Finally, maintaining greenery is important, and the trees on ECR threaten the safety of drivers, cyclists, and pedestrians alike; Caltrans' decision to go ahead with slow tree removal while planting new ones is a step in the right direction.

Response to Comment Davis Turner-3

Thank you for your comment.

5.4.2.12 Bill Matters

Comment Bill Matters-1

Please do the underground utilities. It's an opportunity to ensure weatherproofing and safety. We do not want downed powerlines starting a fire.

Response to Comment Bill Matters-1

The commenter's support for the design option is noted.

5.4.2.13 Natalie Cookson

Comment Natalie Cookson-1

El Camino and Oak Grove along McKinley Elementary needs to have concrete pillars/balls to protect the children from possible cars crashing into the school. It is a safety tragedy waiting to happen.

Response to Comment Natalie Cookson-1

One of the purposes of the project is to enhance user visibility and safety. During the design phase, Caltrans will consider implementing VIS-1 and VIS-2 tree replanting by placing trees and other landscape elements as a buffer to further separate vehicles from pedestrians if consistent with horticultural and maintenance guidelines and safety and sight distance standards. Additional opportunities to improve safety further will be explored during the design phase.

5.4.2.14 Mark Graham

Comment Mark Graham-1

Your priority selection choice is excellent of:

- Preserve and extend the life of the roadway and improve ride quality;
- Improve drainage efficiency to reduce localized flooding;
- Enhance user visibility and safety; and
- Enhance pedestrian infrastructure and bring it into compliance with Title II of the Americans with Disabilities Act (ADA).

Both bus-only lanes and bike-only lanes would be disastrous for El Camino Real in Burlingame. Also combined Bus-bike only lanes would also disastrous.

These "only" lanes would cause vehicle overflow to California Drive which could not handle the increased capacity.

Your priorities have been correctly set and should be the main focus of the project.

Response to Comment Mark Graham-1

Thank you for your comment. The PDT findings indicate that removing a general lane of traffic in each direction would cause severe congestion. Your support of the PDT's decision is noted.

5.4.2.15 Matthew Stenberg**Comment Matthew Stenberg-1**

I am writing to provide public comment on the current draft proposals for reconstruction on El Camino Real in Burlingame. The existing proposals are completely inadequate at protecting the existing tree canopy that is (correctly identified as) an historic resource. Caltrans and PGE too readily want to find the cheapest alternative -- cutting down trees -- instead of working to find solutions that might require a little more effort but will have long term positive impacts for residents. I implore you to do more to preserve historic trees and to minimize tree loss. Your current alternatives are woeful in this regard.

In the draft environmental impact report, all three options for tree removal are quite frankly unacceptable, but the view at Figure 3.1.5-7 at least is the closest to maintaining the integrity of the existing, and should be considered a starting point for your process. But vastly more care should be taken to minimize the reduction in mature trees.

Mature trees are important not only for their visual historical character but also for climate change mitigation -- both in their large cooling canopies and their greater ability to process co2.

Your commitment to replacement trees "our goal is to plant a replacement tree for every tree removed. The types and locations will be determined during the design phase" is again, completely inadequate, and provides a lot of wiggle room for you to value engineer away tree replacement.

You need to have a commitment to vastly minimize mature tree loss -- retaining far more trees than you currently do --, and to replace the canopy that is lost with mature trees, something that is inadequately present in the report as present. Both Caltrans and PGE have a history of inadequately considering the long term impacts on local communities to cut costs in the present, and this report is highly indicative of that.

Response to Comment Matthew Stenberg-1

Please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows.

5.4.2.16 Robert Ruth**Comment Robert Ruth-1**

In watching the webinar presentation, I was impressed by the following decisions:

- < Undergrounding utilities which provided better alternatives for other community considerations.
- < Replacing eucalyptus trees with trees which still provide drivers and pedestrians with a park-like environment similar to the existing one. This environment is calming and, in my opinion, helps drivers to be more respectful of other drivers and pedestrians. (Since many of the eucalyptus trees are approaching their life span of 100 years, they would have to be replaced in a few years anyway to provide for safety of vehicles, pedestrians and structures.)
- < Reviewing structures to identify those with historical significance.

Thank you for your hard work in looking at all alternatives and providing a creative solution for this project.

Response to Comment Robert Ruth-1

Thank you for your supportive comment.

5.4.2.17 Edward Catlin**Comment Edward Catlin-1**

I am writing to voice my support kid-safe, multimodal streets, fast and frequent transit, and vibrant neighborhoods with abundant housing and lush greenery.

Throughout the history of the El Camino Roadway Renewal project in Burlingame, much has been done to study and mitigate the impact that a roadway renewal project would have on the Ralston Tree Rows. However it seems to me that Caltrans has not adequately taken into account the needs of transit riders or bicyclists.

Transit riders typically have lower incomes than drivers, and transit speeds on El Camino in the project section are slow. It is imperative for seeking an equitable corridor to have better transit. Similarly, this section of El Camino Real is used by bicyclists, and is incredibly unsafe for bicycle use. People of all ages regularly ride on El Camino's road and sidewalks. Instead of studying bicycle infrastructure, Caltrans abdicated its responsibility to do so in order to avoid coming up with alternatives that made the roadway safer for bicycles. In an era where Caltrans has explicitly adopted a goal of mode shift, this lack of study is an unquestionably irresponsible decision that will maintain the dangerous status quo for bicycles.

I would encourage the team to explore the following:

1. Transit-only lane in either the northbound or southbound direction, accompanied by a 4-to-3 lane road diet
2. Shared use path for bicyclists

Response to Comment Edward Catlin-1

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

Comment Edward Catlin-2

Below are additional specific comments/questions that I have, in conversation with other concerned individuals and organizations:

1. To what extent will vehicle miles traveled (VMT) be reduced in each of the alternatives (road diet and existing lane configuration) in accordance with state goals?

Response to Comment Edward Catlin-2

Please see the response to Comment Kat Wortham-3 for a discussion of VMT related to the proposed project and also Section 4.5.3.1 of the document where this is discussed.

Comment Edward Catlin-3

2. How does this project contribute to Caltrans' stated goals of achieving increased shifts to non-auto transportation?

Response to Comment Edward Catlin-3

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives and the response to Comment Kat Wortham-4 for a description of potential mode shift.

Comment Edward Catlin-4

3. Please comment on the draft San Mateo County Bicycle Master Plan: https://static1.squarespace.com/static/5dcdea09b844e23fcd271961/t/60244f9c0c69a804fa2533b1/1612992562693/CCAG+CBPP+Public+Draft+02.10.2021_lowres.pdf. On page 44 of the plan, in the Countywide Bicycle Backbone Network Project List listed as Project ID 7.03, a bicycle facility of undetermined type is called for. This includes the entire section of El Camino that this environmental impact report is supposed to encompass. In the EIR, Caltrans wrote, "The Draft San Mateo Countywide Bicycle and Pedestrian Plan does not include designated bicycle facilities along the roadway within the majority of the project limits." Was Caltrans incorrect when it claimed consistency with the plan in the Draft EIR? Will Caltrans please view page 44 of the draft report, and notify the public if it has incorrectly assessed the draft plan? Will it please issue a correction in the environmental document that the Draft San Mateo County Plan does, in fact, list as a project with a unique project id, a bicycle facility of undetermined type in the entirety of the project area, and that a bicycle facility is intended to be studied on the corridor? How is Caltrans' refusal to study bicycle facilities on this stretch as part of the EIR consistent with the San Mateo County Draft Bicycle Master Plan?

Response to Comment Edward Catlin-4

Please see the response to Comment Kat Wortham-6 for a discussion of the San Mateo County Bicycle Master Plan.

Comment Edward Catlin-5

4. Will induction loop sensors capable of detecting bicycles be used for vehicle detection at signals?

Response to Comment Edward Catlin-5

Please see the response to Comment Kat Wortham-7 for a discussion of bicycle loop detectors.

Comment Edward Catlin-6

5. Is it the intent of the project to upgrade signal systems at the intersections? Please list all planned upgrades, and whether any signals will be relocated at any intersections. We ask this question to determine whether or not signals can be placed differently in order to accommodate safer intersections for bicyclists.

Response to Comment Edward Catlin-6

Please see the response to Comment Kat Wortham-8 for a discussion of signal systems.

Comment Edward Catlin-7

6. El Camino Real in the project area is a residential street (has residential uses). Please describe in detail how cyclists, under the current no build and preferred build alternatives, should cycle to and from destinations on El Camino Real. Is it safe for them to bike on the roadway? Is it safe for them to bike on the sidewalk? What is the collision rate on this stretch of the corridor, and does it justify Caltrans not studying the corridor for bicycle safety?

Response to Comment Edward Catlin-7

Please see the response to Comment Kat Wortham-9 regarding bicycle improvements within the project limits.

Comment Edward Catlin-8

7. Please provide recent (less than 2 years old) bicycle counts on El Camino Real that justify not studying the roadway for bicycle improvements.

Response to Comment Edward Catlin-8

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives; and the response to Comment Kat Wortham-10 for a discussion of project objectives related to bicycle improvements.

Comment Edward Catlin-9

8. Please provide recent (less than 2 years old) transit rider and transit speed data that justifies not studying a transit-only lane given 2040 congestion growth scenarios.

Response to Comment Edward Catlin-9

Please see the response to Comment Kat Wortham-11 for a discussion related to transit use in the project limits.

Comment Edward Catlin-10

9. In the Caltrans Mode Share Action Plan 2.0 (<https://dot.ca.gov/-/media/dot-media/programs/sustainability/documents/caltransmodeshareactionplan20final-002.pdf>), the agency explicitly stated under its first goal (1.1) that it intends to “Support district efforts to invest State Highway Operation and Protection Program (SHOPP) or other funds (Interregional Transportation Improvement Program (ITIP), Active Transportation Program (ATP), Senate Bill 1 (SB 1) competitive programs, etc.) in active transportation facilities on, across, or adjacent to the State Highway System (SHS). How does this environmental impact report take into account the needs of bicyclists, who represent a crucial active transportation contingent on the corridor?”

Response to Comment Edward Catlin-10

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

Comment Edward Catlin-11

10. Caltrans had adopted a mode share goal of 4.5% trips made by bicycle by 2020. Did Caltrans meet this goal, and how does this project help Caltrans move towards its stated goal?

Response to Comment Edward Catlin-11

Please see the response to Comment Kat Wortham-13 for a discussion of bicycle use in the corridor.

Comment Edward Catlin-12

11. Does Caltrans have a public transportation mode share goal? If so, how does this project help Caltrans meet that goal? Are there any elements in the project that will help increase transit ridership?

Response to Comment Edward Catlin-12

Please see the response to Comment Kat Wortham-14 for a discussion of Caltrans’ multimodal goals.

Comment Edward Catlin-13

Please view the above and provide a timely response, and I very much appreciate the work you all are engaging in and hope you take these comments/questions with the good intention I provide them with!

Response to Comment Edward Catlin-13

Thank you for your comment. All comments received during public review of the Draft EIR/EIS are addressed in this Final EIR/EIS.

5.4.2.18 Laura Hesselgren

Comment Laura Hesselgren-1

I would just like to put in a word for pre picking the trees that will be used on El Camino. I know a lot depends on undergrounding the utilities as this will have a HUGE impact on the project and make a tremendous difference in aesthetics. I feel that you should stay with Eucs and Elms that will continue to contribute to the character of El Camino throughout Burlingame. Once you open it up for discussion, everyone will have an opinion and everyone will want a different tree on different blocks. It's all about the character and this street needs to stay listed on the National Register of Historic Places. Thank you.

Response to Comment Laura Hesselgren-1

Please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows. The goal of maintaining the Tree Rows' listing on the NRHP will be a primary consideration in the selection of types and species of replacement trees.

5.4.2.19 Dennis Mitchell

Comment Dennis Mitchell-1

We love the trees in Burlingame along El Camino Real.

Please don't change the appearance of that precious corridor by removing dozens of Eucalyptus trees.

I've lived here for several decades and appreciate that today's roadway is relatively identical in appearance as it was in the days of my grandparents.

A bit of work needs to be done on the sidewalks in some places and the pavement needs renewing.

Response to Comment Dennis Mitchell-1

As discussed in Section 3.1.5, replacement trees would be planted with implementation of the appropriate avoidance, minimization, and mitigation measures. Twenty years after construction, the replacement trees would reduce the level of resource change to moderate or moderate-high as their canopies increase in size and begin to enclose the roadway creating a screen between adjacent buildings and the roadway environment.

5.4.2.20 Leslie McQuaide

Comment Leslie McQuaide-1

I listened tonight and posted a comment about the blinding early morning and late afternoon sun facing drivers on El Camino.

Burlingame is a City of Trees not “bushes” and I think using large evergreen trees or maybe the eucalyptus Citrodora should be considered. Southern California from Carlsbad to San Diego use them everywhere. And I was the one, many years ago, that suggested them for Easton Drive and other city streets, which they did.

Response to Comment Leslie McQuaide-1

Please refer to Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows, for a discussion on the selection of replacement trees in the project corridor.

5.4.2.21 Adrienne Leigh

Comment Adrienne Leigh-1

1. Removal of 300-350 trees impacts on Animal Life. NONE is erroneously stated in the draft report. Please include the following potential species of birds living in the 350 trees slated to be removed. Removal of all trees must respect the nesting habits and avoid all impact on the birds lifecycles. Trees must individually be evaluated for the following species. This list may not be fully comprehensive.

Chestnut beak chickadee

Mourning dove

California Towhee

American Robin

Anna's hummingbird

Golden Crowned sparrow

Northern Mockingbird

White crowned sparrow

American Kestrel

House finch

Yellow rumped Warbleer

Dark eyed Junko

California Scrub Jay

California Barn Owl

Western Blue Bird

California Woodpecker

Trees cannot be removed during nesting season. Any tree found to have a bird's nest, all attempts must be made to wait until birds have permanently left the nest of their own choosing.

Response to Comment Adrienne Leigh-1

Many species of migratory birds and a variety of other wildlife may inhabit the project's biological study area at any given time, as described in Sections 3.3.1 and 3.3.2 of the Draft EIR/EIS. The construction contractor is required to comply with the Migratory Bird Treaty Act (MBTA) and Caltrans Standard Specification 14-6.03B as part of tree removal and other project-related ground disturbances or equipment operation. These requirements include restricting tree trimming and removal to the period outside the nesting season that occurs from February 1 to September 30. For trees that require removal or trimming outside this timeframe, the trees will be surveyed for the presence of active nests. Buffer zones would be established when active nests are discovered during construction and maintained until birds have fledged. Adherence to the MBTA would substantially reduce conflict with nesting and foraging birds as a result of tree removal. Additionally, trees removed will be replaced with new trees, and there is an abundance of trees surrounding the project limits that contribute to the urban forest.

Comment Adrienne Leigh-2

2. Burlingame Bicycle and Pedestrian Plan calls for complete and continuous sidewalk system on both sides of El Camino Real the entire length of the highway. Currently, across the street from an elementary school, one block of sidewalk is omitted. I believe this is due to Hillsborough's objections. This NIMBY attitude should not reduce the ability of persons to walk along a state highway. People's pedestrian safety is being greatly reduced by the lack of sidewalk between Bellevue and Floribunda on the west side of El Camino because pedestrians are forced to cross streets three times to continue in their planned direction of North or Southbound along west side.

The plan says the reason a sidewalk is not included in this one block is due to saving trees. This is false. It is due to Hillsborough and their reluctance to build sidewalks in their community. However, school children and seniors and everyone all walk along the dirt now as shown by the well traveled dirt path. INCLUDE A SIDEWALK system everywhere and definitely across the street from a school. This project should not progress without it.

Response to Comment Adrienne Leigh-2

Please see response to Comment Kat Wortham-5 for discussion of sidewalks between Bellevue Avenue and Floribunda Avenue.

Comment Adrienne Leigh-3

3. This is not a Complete Street design in this urban area unless sidewalks are complete along all sides of El Camino. The entire length of the project.

Burlingame has adopted Complete Streets principles in their city plans. This project must follow those guidelines.

Response to Comment Adrienne Leigh-3

While the proposed project includes some Complete Streets elements, such as the improvements to pedestrian facilities described in Draft EIR/EIS Section 2.1.1, the development of a comprehensive Complete Streets approach on El Camino Real is not within the scope of this project. The project focuses on correcting roadway deficiencies and improving safety in the project corridor, as described in section 2.1.1 of the Draft EIR/EIS. This project does not preclude future projects to develop a Complete Streets approach in the corridor.

5.4.2.22 Sue Hamilton

Comment Sue Hamilton-1

Thank you for starting this project! El Camino Real through Burlingame, both the streets and the sidewalks, are in dire need of an overhaul.

The Eucalyptus Trees have caused incredible damage and made the roads and sidewalks unsafe in many areas. It would be nice to replace them with some native trees that are more attractive and cause less damage to the streets.

Thanks for addressing this issue!

Greatly appreciated.

Response to Comment Sue Hamilton-1

The commenter's support for the project will be considered as part of the project decision process. No additional response is required as the comment does not raise any environmental issues or questions about the adequacy of the Draft EIR/EIS.

5.4.2.23 Jonathan Bünemann

Comment Jonathan Bünemann-1

I'm an avid cyclist living in San Francisco, regularly visiting my parents-in-law by bike in San Mateo. El Camino is the traditional way to travel north-south on the Peninsula, but a hazard for bicycles - the only time I was able to use it was at the beginning of the pandemic when there were much fewer cars on the road. I believe the EIR should have studied the following alternatives:

1. Transit-only lane in either the northbound or southbound direction, accompanied by a 4-to-3 lane road diet.
2. Shared use path for bicyclists.

Thank you for your consideration

Response to Comment Jonathan Bünemann-1

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

5.4.2.24 Shirin Coleman

Comment Shirin Coleman-1

As a resident of Burlingame for over 30 years, I strong support putting utility poles underground and replacing only the unhealthy trees. Save as many trees as possible. Replace sickly trees with tall, robust healthy trees that will form a canopy over El Camino such as corymbia maculata spotted gum tree (See El Camino in Santa Monica, CA). Keep as many old growth trees as possible. Replace trees in abundance. Do not just replace one tree for three lost; that is not satisfactory. Preserve the design of Burlingame's historic grove of trees. The simulated graphics of what the road scape (Ex. Hillside and El Camico) will look like with utility poles standing and tree plantings on the building side of the sidewalk in 20 years looked shockingly barren, concrete and ugly along what was the precious, historic row of tall trees. Do not turn Burlingame into an indistinctive, concrete landscape with lollipop trees spread far apart. Trees offer beauty, fresh air, greenery, privacy, shade, noise reduction and a habitat for birds. Please take this to heart and consider seriously.

Response to Comment Shirin Coleman-1

Thank you for your comment.

Also, please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows.

5.4.2.25 Bryan Laird

Comment Bryan Laird-1

I noticed that the project ends at E. Santa Inez...

The intersection of Monte Diablo and ECR is very dangerous...it's one block south of E Santa Inez.

The ECR dips before hitting monte diablo in the slow lane going northbound, then is raised and then dips again...a semi with a trailer of bark went over this hump and it's trailer rocked left, then right and fell flat on the sidewalk...!!!!

Needless to say, it would have killed anyone walking there... Luckily it didn't!

Additionally, the crown of the ECR is quite high from E Santa Inez to Tilton, one block down from Monte Diablo...there have been SO many accidents on the southbound slow lane, where cars routinely sideswipe the parked cars...these folks usually hit the cars and drive on...

I've been waiting decades for this type of project and feel that one or two more blocks south would be a huge improvement from a safety standpoint!!!

Response to Comment Bryan Laird-1

As described in Section 1.3.3 of the Draft EIR/EIS, the project limits were primarily determined based on pavement conditions along El Camino Real. The area described in the comment is outside these project limits. However, your concern has been forwarded to the Caltrans Maintenance Division for further investigation.

5.4.2.26 Madeline Frechette

Comment Madeline Frechette-1

I'm sad and disappointed (but not surprised) that Caltrans and the Burlingame City Council are living up to their reputations and doing absolutely nothing to protect and serve vulnerable road users and to curb CO2 emissions from driving with this ECR Roadway Renewal Project.

This recent EIR from Caltrans centers motor-vehicle throughput along the corridor, and that is unacceptable. This opportunity comes around once in a lifetime, and it cannot exclude making the corridor better for everyone (which is a stated goal of this project, even though the output so far is not considering all road users). When potholes and major street surface issues are fixed, it will be easier for drivers to speed and be less cautious of their surroundings. Does Caltrans have any plans for mitigating that? I haven't seen them in the EIR.

Making the road better for everyone entails prioritizing transit users and bike riders and pedestrians. It means studying a dedicated bus lane and a multi use path for pedestrians and bicycle riders. It means figuring out how much you're willing to trade off children's lives as they try to cross El Camino Real to get to school. That is what improving the roadway for everyone would mean. If we don't do these things, then we are not working our way towards a more sustainable, climate friendly, and less violent El Camino Real for everyone. Which generation will finally see rapid transit on ECR, and fully protected bicycle infrastructure? Will it be my unborn child, or my unborn child's children?

Caltrans is famously worried (and Burlingame Public Works and City Council too) about car backup from things like stop signs or physical road improvements like dedicated bus lanes, but they don't want to talk about how the current road configuration on ECR only induces demand for driving, which is a problem that compounds every minute of every day. I want Caltrans to start talking about it, and I want answers: how much demand for driving is our current configuration of ECR inducing? What is the opportunity cost of foregoing a solution that helps make transit and bicycle riding and walking the more attractive modes of transportation?

I don't know what's in people's minds and hearts, and I know there are very well intentioned people at Caltrans and on the Burlingame City Council working on making Burlingame and California a better place. But outcomes are what matter, not the intention. For all the hard work and improvements Burlingame and Caltrans think they're making in regards to safe streets and combating climate change, it is not nearly enough and it is all decades too late because there is no political will to actually move ahead with the transformative multi-modal roadway changes needed that are known to influence human behavior in the ways that would have meaningful positive impacts on our ability to curb climate change and save lives. There is no political will to do these things because they require a change to the status quo, and politicians like Michael Brownrigg and Emily Beach are more concerned with their future campaigns and not ruffling who they know for certain are a large segment of their electorate than they are with catalyzing meaningful progress. This is unacceptable.

Response to Comment Madeline Frechette-1

This comment states an interest in accommodating vulnerable travelers and curbing CO2 emissions. As described in Section 2.1.1, the Build Alternative would make substantial improvements to pedestrian infrastructure in the corridor. Current sidewalks are largely deficient, do not meet the current state and federal standards for ADA compliance, and are damaged by tree roots and trunks encroaching into them (Section 1.3.2.3).

Section 2.1.1 of the Draft EIR/EIS includes a description of pedestrian improvements included in the Build Alternative. Implementation of these improvements would increase safety for people who are blind, deaf, or have low vision.

This comment also suggests that roadway surface corrections correlate with increases in vehicle speed. The proposed roadway and drainage improvements would correct cracking, ponding, and flooding, which can present hazards and distractions for all travelers on El Camino Real, not just drivers. The project would not change the existing speed limits or traffic enforcement in the project limits.

The comment advocates for a transit only lane and shared bicycle and pedestrian path. While neither the Build Alternative nor the No Build Alternative includes a transit only lane, it should be noted that the potential rehabilitation of SR-82/El Camino Real studied in this assessment does not preclude future projects to further improve multimodal transportation in the corridor.

As stated in Section 3.1.1.2 of the Draft EIR/EIS, the Build Alternative would not include bike lanes on El Camino Real within the project limits. However, the parallel roadway, California Drive, has a designated Class III bike route south of Broadway and a Class II bike lane north of Broadway and the project includes enhancements at intersections for bicycle cross traffic.

The comment solicits feedback regarding rapid transit and bicycle infrastructure on El Camino Real. As stated above, the potential rehabilitation of El Camino Real does not preclude future projects to further improve multimodal transportation in the corridor.

The comment also claims that the current roadway configuration on El Camino Real induces demand. As stated in Section 4.5.3.1, this project would not increase the vehicle capacity of the roadway. Because the project would not increase the number of travel lanes on El Camino Real, no increase in vehicle miles traveled would occur as result of the Build Alternative (either with or without inclusion of the design option). The project is consistent with the Caltrans Mode Share Action Plan through the inclusion of pedestrian improvements and improvements at intersections for bicycle traffic crossings. The project includes significant upgrades to the pedestrian infrastructure within the project limits that would promote walking. This would encourage mode shift and help decrease the Bay Area's per-capita carbon dioxide production.

The comment expresses interest in alternatives focused on transit and/or bicycle lanes. Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

CO2 is a primary component of greenhouse gases (GHGs), which are analyzed in Draft EIR/EIS Section 4.5.3. The project would not increase capacity for motor vehicles, and therefore the only potential increase in GHG emissions would be associated with temporary construction activities.

Comment Madeline Frechette-2

I'm disappointed that so far in this project Caltrans and Council Members Emily Beach and Michael Brownrigg have done nothing to serve all road users. The online public comment forums by Caltrans earlier in the year are bursting with comments asking for safe bicycle infrastructure solutions and bus rapid transit like a dedicated bus lane. There is regional demand for a resilient, safe accessible El Camino Real that prioritizes transit and bike riding too. Caltrans and the council members on the task force are ignoring the loud and clear needs of all road users. It is an abhorrent display of the status quo that has induced demand for driving, and in turn perpetuates traffic violence and the acceleration of climate change. Everyone with a hand in this project is complicit in that outcome.

The decisions being made on this project have a direct impact on whether or not vulnerable road users die preventable deaths or suffer injuries. The decisions being made on this project have a direct impact on our region's ability to curb it's largest source of CO2 emissions by encouraging more sustainable and efficient modes of transportation like taking the bus. The Task Force, headed by Emily Beach and Michael Brownrigg (who are both eyeing seats in higher office where they would have more regional responsibilities) was woefully unrepresentative-- with concerns about the Eucalyptus trees dominating the public discourse because the demographics who have the time and ability to show up and participate (namely white, home-owning, and wealthy residents living west of El Camino Real) were the loudest in the room. When confronted earlier in 2021 with the lack of representation and the voices from sensitive communities who rely on transit being left behind, Council Members Emily Beach and Michael Brownrigg did nothing to right this wrong. A once in a lifetime opportunity, and Emily Beach and Michael Brownrigg couldn't be bothered.

Response to Comment Madeline Frechette-2

The public comments received through the public forum were considered by the PDT. Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

Comment Madeline Frechette-3

At multiple points in this project like at a 2020 public meeting and at a virtual meeting hosted by Burlingame CEC and in emails, Emily Beach perpetuated misleading statements at best and lies

at worst about who uses ECR: using a personal anecdote about only seeing a couple people ride bikes on ECR in her whole time living in Burlingame and suggesting California Drive is an appropriate bike route alternative to ECR. Two statements communicating, in so many words, that ECR does not need to accommodate bike riders. Forget the piles of public comments across the region in SMC showing demand and need for safe bike infrastructure on ECR, and traffic collision statistics and average vehicle speeds, heck even the collision statistics involving bicycles on ECR— apparently that doesn't matter because Emily Beach says she's only ever seen two people riding on ECR. Since the beginning of June I have been emailing counts of bike riders I observe when I happen to be along ECR in Burlingame to Emily Beach. Without fail, every time I'm on the road walking or on the bus I see more than one bike rider (and in a span of 10 minutes or less) either in the traffic lane or using the sidewalks. It is exhausting to have elected leaders willfully perpetuate misinformation about bike usage on ECR, especially to serve an agenda. Not once has Emily Beach publicly walked back her previous inaccurate statements, nor has the notion that "California Drive is an acceptable alternative bike route to ECR" been endorsed by Burlingame's BPAC or SVBC members. Once again, the public comments submitted early in 2021 on the Caltrans forum for this roadway renewal project prove there is significant demand for safe bicycle infrastructure on ECR. Beach's attempt at massaging away raised flags about this project excluding bicycle riders and other multi-modal needs only make sense in the context of who she is favoring in this act— the eucalyptus preservationists. And for what? The trees have to come out anyway.

Response to Comment Madeline Frechette-3

Bicycles are currently allowed on El Camino Real. The trees within the Howard-Ralston Eucalyptus Tree Rows are a historic property listed on the NRHP and as such are afforded a degree of protection from project impacts. The PDT has adequately balanced the need to avoid, minimize, and mitigate impacts to the Howard-Ralston Eucalyptus Tree Rows with the need and purpose of the project.

Comment Madeline Frechette-4

The task force and much of the work on behalf of Caltrans courted the concerns about preserving a specific type of tree: the Eucalyptus. This particular concern about eucalyptus preservation is not serving a fundamental human need, but is rooted in deeply classist models of historic preservation and conservation movements in the United States that have disregarded the needs of more vulnerable, disenfranchised communities when it comes time for urban renewal projects. That is what has played out here in Burlingame with this ECR renewal project. It is a shameful reminder that we have not learned from our Country's ugly history of urban renewal that spawned from white flight, suburban sprawl, and the resulting demand for privatized motor-vehicle use. Many state DOTs and elected representatives at all levels were complicit in the outcomes of mid century urban renewal that impoverished, segregated, poisoned, shortened the life expectancies of and disenfranchised the poor and commonly black and brown neighborhoods where these renewal projects were happening. Current State DOTs and City Councils are still complicit to this day by not righting those wrongs or by doing better in the renewal opportunities we have in front of us like with ECR in Burlingame.

I'm sure you're all well aware that ECR in Burlingame is home to one of the longest continuous stretches of multi unit housing in the city, conveniently buffering neighborhoods west of El Camino Real (where the median home price is nearing 3 million and the white population dramatically shoots up to as high as 80 or 90% on some blocks) from noise, pollution, and traffic violence. Simply repairing the roadway surface will not change the fact that ECR is fundamentally a residential street that Caltrans and Burlingame City Council allows to function like a dangerous, polluting highway. I heard Michael Brownrigg virtue signal once at a city council meeting about Burlingame not having any stake in big oil, and that the city has a good moral and clean investment portfolio. But I imagine if oil executives learn about how projects like the Burlingame ECR roadway renewal project pan out, they get a good laugh.

Response to Comment Madeline Frechette-4

Thank you for your comment. Responses are only provided to comments that are related to the adequacy of the EIR/EIS for addressing environmental effects associated with the proposed project.

Comment Madeline Frechette-5

Trees are an important aspect of any city, sustainability, and certainly equitable access to helpful climate cooling urban design. However there is no need to bend over backwards for the most dangerous, fire-hazardous, destructive and invasive type of tree like the Eucalyptus. The Eucalyptus being on the national register of historic resources means nothing to me when my main concern is using a street without being killed by a driver. Or having to use an unreliable, infrequent transit system to get to essential services like my doctor's office (which by the way, takes an hour and twenty-five minutes each way by bus, but just twenty-five minutes by car). The eucalyptus being on the historic register is only a reality today because a handful of very privileged residents of Burlingame—who don't worry about waiting for a bus to get to the doctor or being taken out while on two wheels by a driver—had the time to investigate and pursue a potential legal solution to preserving the invasive tree. The Eucalyptus are not a resource serving pressing human needs of today. The meaning and value preservationists place on them is purely a personal belief, and I would expect Caltrans project members and Burlingame City Council working on this project to treat it as such. Instead they have treated this as "gospel," another upsetting reminder of just who our governing bodies choose to represent— even if it's just the public theatre part.

Response to Comment Madeline Frechette-5

The commenter's views about the value of preserving eucalyptus trees compared to safety and efficiency of travel on El Camino Real are noted. Please see the response to Comment Madeline Frechette-3.

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives, and response to Comment Madeline Frechette-3 regarding eucalyptus preservation.

Comment Madeline Frechette-6

The discourse around the trees and the lack of emphasis on safe sustainable streets for everyone is a stain on the Burlingame community and it is an embarrassment to the entire state. Especially as we enter into what will most likely be the driest, hottest, most violent fire seasons any of us have experienced. There's never a bad time to do the right thing, but issues like climate change and curbing preventable traffic deaths and injuries require immediate action. Not waiting until multiple people die or are injured to take some action and ban a left turn lane on ECR (as Michael Brownrigg gloated about at the CEC virtual meeting when confronted with statistics about traffic collisions on ECR), and not waiting until transit service is so dismal and unusable that the public loses faith entirely and the mode switching that we need fades into a pipe dream. Perhaps some elected leaders feel content in being able to buy a new electric vehicle while approving new parking garages on scarce public lands downtown near transit. Or widening 101 under the guise of an "equity" program. But I'm paying attention and I'm not fooled by greenwashing or by politicians like Emily Beach and Michael Brownrigg cow-towing to an old-timey, wealthy segment of their electorate at the expense of everyone else and our environment. Handfuls of others who logged on to submit a comment earlier this year with Caltrans don't seem to be fooled either. A better world is possible and all it requires is a bit of political will. I have seen none with ECR in Burlingame.

I can only hope we have assembly members and state senators that continue to partner with our region's coalitions and advocacy groups in housing and transportation to craft meaningful laws that would force Caltrans and local city councils to do the right thing in their renewal projects, much in the same way we have ADA laws requiring sidewalks to be maintained as accessible. This project is a reminder that when left to their own devices, state dots and local governments rarely do what's best for the most vulnerable communities and for our environment. The ECR Roadway renewal project has proven to be a run of the mill cautionary tale in white environmentalism, political cowardice, and an overabundance of selective hand-holding of the most privileged community concerns (not needs) among us.

There is still time in this project for me to be proven wrong in this assessment, and I hope I am. However it is deeply regrettable, upon review of this draft EIR and it's exclusion of moving forward with any improvements for bicycle riders and transit users, or any significant street design improvements to calm traffic and encourage more sustainable modes of transportation, that I feel compelled to say you all have failed your most vulnerable constituents. Folks who are sad about the Eucalyptus will continue on with no material change to their basic needs being met day to day, but transit reliant communities and other multi-modal groups will continue to be forced into a losing position when they use El Camino Real in Burlingame.

Response to Comment Madeline Frechette-6

Please see the responses to Comment Madeline Frechette-3 and Comment Madeline Frechette-5 regarding bicycle and transit enhancements. Responses are only provided to comments that are related to the adequacy of the EIR/EIS for addressing environmental effects associated with the proposed project.

5.4.2.27 Katharine Moore

Comment Katherine Moore-1

I was glad to see that Caltrans' preferred option is two lanes of vehicular traffic in each direction. I was concerned, based upon the preliminary work, that the number of traffic lanes would be reduced.

Response to Comment Katherine Moore-1

The commenter's support for the Build Alternative is noted. "Road Diet" alternatives were considered but not advanced for detailed analysis in the Draft EIR/EIS for the reasons described in Section 2.1.4.1.

Comment Katherine Moore-2

To the extent feasible, undergrounding is a preferred alternative.

Response to Comment Katherine Moore-2

The commenter's support for utility undergrounding is noted.

Comment Katherine Moore-3

I remain concerned that all of the invasive eucalyptus trees are not being removed. The state spends millions of dollar annually removing invasive species - including blue gum eucalyptus. - at various locations state-wide It is inconsistent with state-wide policy to leave any of these trees intact. The reasoning appeared biologically dubious, although I will acknowledge that I am not a biologist. The Oakland fire showed how dangerous these trees are in a fire.

Response to Comment Katherine Moore-3

As described in the Draft EIR/EIS, red gum and blue gum eucalyptus and some elms within the project limits are considered invasive species and yet are also contributors to the Howard-Ralston Eucalyptus Tree Rows, a protected resource listed on the NRHP. These trees do not appear to be propagating into adjacent ecosystems, such as creeks within the biological study area (BSA), or elsewhere within the project limits. This is likely due to the extensive nature of land development and armored creek banks within the BSA. California Invasive Plant Council (Cal-IPC) categorizes both blue gum and red gum eucalyptus as “limited—these species are invasive, but their ecological impacts are minor on a statewide level or there was not enough information to justify a higher score. Their reproductive biology and other attributes result in low to moderate rates of invasiveness. Ecological amplitude and distribution are generally limited, but these species may be locally persistent and problematic” (Cal-IPC 2021).

In addition, the National Park Service recognizes that some eucalyptus trees should be treated as cultural resources and not invasive species and manages them as such within their parks, as does California State Parks.

The Howard-Ralston Eucalyptus Tree Rows have been part of the cultural landscape of the Burlingame area for almost 150 years. Preservation and restoration of the Tree Rows is considered important as they are not only representative of the City of Burlingame, but they also give the area its sense of place.

5.4.2.28 Kristie Eglsaer**Comment Kristie Eglsaer-1**

Thank you for the opportunity to comment on the Draft EIR/EIS for the El Camino Roadway Renewal project. Thank you for making pedestrian safety a top priority. I think there is a missed opportunity, though, for making El Camino Real a complete street and one that supports multi-modal use.

The report shows that the proposal is not consistent with the Grand Boulevard Multi-Modal Transportation Corridor Plan or the San Mateo County or relevant cities' Bicycle and Pedestrian Plans (p. 49/207). These multimodal plans should be considered in the Cumulative Impacts on p. 133/207 for the current alternative; however, additional alternatives should be added to include safe and effective options for multi-modal transportation so that the roadway renewal project supports fast, frequent bus service and a safe route for transit riders, bicyclists and pedestrians.

Response to Comment Kristie Eglsaer-1

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternative, and the response to Comment Adrienne Leigh-3 regarding complete streets principles. Section 3.1.1.2 details the project's consistency with State, Regional, and Local Plans and Programs, including the Grand Boulevard Multimodal Transportation Corridor Plan.

Comment Kristie Eglsaer-2

Regarding the Environmental Justice section of the document (p. 56/207), the report does not acknowledge the adverse impacts the project will have on minority and low-income communities by not making this road a complete street that prioritizes multi-modal transportation. It is

imperative for seeking an equitable corridor to have better transit and a safe corridor for all modes of transportation.

Response to Comment Kristie Eglsaer-2

According to Section 3.1.3.3 of the Draft EIR/EIS, the design of the Build Alternative and the resulting improvements do not vary substantially among the portions of the project limits that abut environmental justice communities when compared with the portions of the project limits that abut non-environmental justice communities. Therefore, potential adverse effects of the project would not disproportionately affect minority and low-income populations; the environmental justice communities would experience the same improvements and the same level of construction-related effects as non-environmental justice communities within the project limits.

Additionally, it should be noted that the potential rehabilitation of SR-82/El Camino Real studied in the Draft EIR/EIS does not preclude future projects to further improve multimodal transportation in the corridor.

Comment Kristie Eglsaer-3

This section of El Camino Real is used by bicyclists, yet is very unsafe for bicycle use. It is not enough to say that California Drive could be used by bicyclists instead. This road may be parallel, but it is not near enough to be a viable alternative and El Camino is a major enough road that people want to travel along it to reach the many destinations that are along ECR. In future alternative analysis, please consider how to detect bicycles at signals and signal placement for safer intersections for bicyclists.

Response to Comment Kristie Eglsaer-3

This comment is related to bicycle use on El Camino Real. While there are no designated bicycle facilities along El Camino Real within the project limits, bicyclists can currently use El Camino Real and will be able to continue to do so in the future. Also, please see the response to Comment EPA-4 for a list of potential bicycle improvements proposed for the project.

Comment Kristie Eglsaer-4

In the Energy and GHG sections (p. 116/207 and 157/207), the report should discuss to what extent vehicle miles traveled will be reduced with additional alternatives that consider multi-modal transportation to contribute to Caltrans' goals of achieving increased shifts to non-auto transportation and the goals in Caltrans Mode Share Action Plan 2.0. This is an opportunity! We should take full advantage of the opportunity to achieve the agency and state's goals.

Response to Comment Kristie Eglsaer-4

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives. As stated in Section 4.5.3.1 of the Draft EIR/EIS, the project would not increase the number of travel lanes on El Camino Real. Therefore, no increase in vehicle miles traveled (VMT) would occur as result of the Build Alternative, either with or without inclusion of the design option.

Comment Kristie Eglsaer-5

It seems the conclusion that is being drawn in the CEQA Transportation section on p. 166/207, is that this plan would maintain the VMT status quo. So all this construction will be done, time and

money spent, and it will not have gotten us any closer to our goals. That seems like a real missed opportunity!

Alternatives need to be reviewed so that the sidewalk network between Bellevue and Floribunda Avenues can be completed to ensure pedestrian safety and this should also be addressed on p. 166/207 in the CEQA Transportation section.

In order to meet the Environmental Justice, Energy, GHG, Transportation and Climate Change and other aspects of the EIR/EIS, Caltrans must study alternatives that incorporate safe and reliable transit and bicycle lanes.

Roadway configuration options should be studied and included as alternatives in the environmental impact report that look at a transit-only lane in either the northbound or southbound direction, accompanied by a 4-to-3 lane road diet and shared use path for bicyclists.

Thank you very much for the opportunity to comment and I look forward to seeing plans going forward that help us achieve a multi-modal future!

Response to Comment Kristie Eglsaer-5

Please see the response to Comment Kristie Eglsaer-2 regarding the alternatives studied in the Draft EIR/EIS.

As stated in Section 4.5.3.1 of the Draft EIR/EIS, the project would not increase the number of travel lanes on El Camino Real. Therefore, no increase in vehicle miles traveled (VMT) would occur as result of the Build Alternative, either with or without inclusion of the design option.

The project includes substantial upgrades to the pedestrian infrastructure within the project limits that would promote walking. This would support a mode shift and may help to incrementally decrease the Bay Area's per-capita carbon dioxide production.

As stated in Section 2.1.1 of the Draft EIR/EIS, there are existing crosswalks at both the El Camino Real/Bellevue Avenue intersection and the El Camino Real/Floribunda Avenue intersection to assist pedestrians in navigating to the northbound side of the roadway and continuing along El Camino Real. No new sidewalk is being proposed between Bellevue Avenue and Floribunda Avenue in order to preserve existing street trees at this location that contribute to the Howard Ralston Eucalyptus Tree Rows, a protected resource listed on the NRHP. The PDT has adequately balanced the need to avoid, minimize, and mitigate impacts to the Howard-Ralston Eucalyptus Tree Rows with the need and purpose of the project.

Section 3.1.1.2 details the project's consistency with State, Regional, and Local Plans and Programs, including the Grand Boulevard Multimodal Transportation Corridor Plan. As stated in this section, the Build Alternative would not include bike lanes on El Camino Real within the project limits due to severely constrained right-of-way. However, California Drive parallel to and east of El Camino Real, has a designated Class III bike route south of Broadway and a Class II bike lane north of Broadway to Murchison Drive.

Environmental topics studied in the EIR/EIS, including Environmental Justice, Energy, GHG Emissions, Transportation, and Climate Change conform to the statutory requirements set forth by CEQA and NEPA for the studied alternatives. As stated above, the scope of this assessment is limited to the Build Alternative and No Build Alternative described in Section 2.1. Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives regarding the configurations proposed in the comment.

The project would not change existing transit services in the corridor, nor would it preclude future projects to further improve multimodal transportation in the corridor. All existing bus stops within the project limits will be replaced in kind. In addition, pedestrian facilities included in the project will support transit ridership by improving pedestrian access to transit stops by providing ADA ramps and sidewalks naturally improves access to transit stops.

Also, please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

5.4.2.29 Steve Carlson

Comment Steve Carlson-1

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report and Environmental Impact Statement for the El Camino Real Renewal Project.

The pavement of ECR, correction of drainage issues and pedestrian safety improvements are long overdue. I am in support of these concepts. However, I am disappointed that the proposed project has been designed without the inclusion of multi-modal transportation facilities or clear linkages to such facilities and cannot support the project as designed. The ECR is a vital transportation corridor that is regional serving and is important to meet the transportation needs associated with the existing and future growth and development (state residential mandates) of the Peninsula communities. The project should be redesigned to include multi-modal facilities, Grand Boulevard Initiative, San Mateo plans and include a greater range of stakeholders including corridor area residents in San Mateo and Millbrae, and transit, bicycle pedestrian and multi-modal advocates.

In general the DEIR/EIS is incomplete and needs to be amended and recirculated. The project proponents have stated a couple of public meetings that the project is a work in progress, that some key corridor information and/or evaluation has not been disclosed (e.g. trees) and that a lot of the evaluation and design of improvements will not be known until the design stage, well after public hearings and the FEIR/EIS certification.

This is akin to a proponent submitting a development proposal for discretionary approval by a local agency for development without including any conceptual plans. Without conceptual plans a proposal cannot be considered a project, no meaningful environmental review can take place and the proposal would be rejected as incomplete.

The ECR project description is too general and is incomplete. The description does not include scaled and dimensioned conceptual plans of the existing and proposed project especially at intersections. Detailed conceptual plans are vital in facilitating not only the understanding of the project, but to fully identify and evaluate the associated impacts. The proposal should be expanded to include, but not limited to, the following information - existing and future utilities, roadway and sidewalks, pavement markings and intersection improvements.

Key relevant and available corridor information is not included (e.g. location, size, condition of trees and identifying the trees to be removed). The impact analysis is too narrowly focused on the project impacts in Burlingame to the exclusion of information regarding impacts in Millbrae and San Mateo (e.g. mature trees also in San Mateo but this information is not included except at very conceptual manner and no visual evaluation performed). The DEIR/EIS contains inaccurate statements which form the apparent basis of inaccurate impact ratings (e.g. project compliance with San Mateo Plans is limited to a couple of policies but leaves out numerous relevant policies included several plan documents that would necessitate potential design revisions to the proposed project). Potential significant conflicts between Federal, State and local policy issues related to non-native and non-native invasive species which underpin the proposed project are not identified nor evaluated.

Attached are more detailed comments that expand on this summary. Should you need clarification of any of my comments please do not hesitate to contact me. I look forward to working with you. Again thank you for the opportunity to comment.

Response to Comment Steve Carlson-1

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

The Draft EIR/EIS appropriately provides a general project description that is readable and accessible to the public. The purpose of the environmental document is to consider and disclose the environmental impacts of the project, and all features of the project that may result in environmental impacts were described in the Draft EIR/EIS. Pedestrian signal upgrades will be made to existing signal systems, and the locations of new hybrid pedestrian signals was identified in the Draft EIR/EIS (see Section 2.1.1). Design details will be further developed during the design phase. Also, the environmental document proportionately focuses on City of Burlingame because that is where the majority of the project occurs and hence, where the majority of environmental impacts (including impacts to historic resources and tree removal) will also occur.

Invasive species are discussed in Section 3.3.3 of the Draft EIR/EIS.

The potential tree removal based on preliminary plans were included in the VIA, the technical study which the Visual/Aesthetic Section of the Draft EIR/EIS is based upon. The technical studies were made available and subject to public review upon request. No such request was received. However, to provide additional information in response to comments, the preliminary tree mapping from the VIA (which had been made available during the public comment period) is included as Appendix J to this document, the Tree Preservation Assessment completed after the circulation of the Draft EIR/EIS is included as Appendix K.

Comment Steve Carlson-2

I understand the proposed project to include the reconstruction and/or re-pavement of ECR, reconstruction of curb gutter and sidewalks to comply with Caltrans and ADA standards, upgrading existing signalized intersections (including installation of pedestrian countdown signals at signalized intersections and the installation of 3 hybrid crosswalks), upgrades to the ECR drainage systems to eliminate localized temporary flooding (primarily or exclusively in Burlingame), and the conservation of as many trees as possible within the ECR corridor (at least in Burlingame).

The project need appears to be associated in part with persistent localized flooding along portions of ECR (largely in Burlingame) during inclement weather, damage to the traffic roadbed, storm drainage and sidewalks due to age, flooding and numerous large size trees lining ECR.

As noted in the DEIR/EIS a significant number of the trees located in Burlingame have long since been a nuisance and hazard to motorists and pedestrians. Due to the size and proximity to the roadbed and sidewalks the larger trees have intruded into the roadbed and disrupted sidewalk. Many of the larger and older trees are apparently no longer in good condition or are nearing the end of their life span.

Burlingame has long sought to preserve ECR as a landscaped corridor and has taken the extraordinary measure of identifying many of the trees within the Burlingame corridor as official historic cultural resource (2012) (even though the land owner is Caltrans). For a few decades both Burlingame and Caltrans have long discussed the corridor safety improvements, but have

only recently agreed in principle on tree preservation (where feasible) tree replacement (where needed) and long-term maintenance.

The need to improve the safety of travel for motorists and pedestrians is essential and is long overdue. However, since the project was first conceived many circumstances have changed. Over these same decades, Peninsula communities have significantly grown in size as have traffic along the north south highway corridors - US Highway 101 and SR 280 - that have carried the bulk of north-south traffic load. Traffic along ECR has also grown significantly during this period, and as the major highways are at times heavily congested ECR has become a vital north-south traffic corridor and an important alternative with the increasing congestion on the major corridors.

Development in the Peninsula communities is being pressured by public and private interests to significantly intensify over the near to mid-term for both housing and commercial resulting increased travel demand.

The State of California has only recently mandated that each community significantly increase housing development and given communities little opportunity to opt out. When combined with the need to expand commercial development and employment opportunity increased medium to high density housing will only add travel demand to an overburdened system. The major north-south corridors are congested and with the exception of the addition a US 101 toll lane, no new capacities will be added and no new freeways will be constructed. Transit and rail capacity are limited, and while Caltrain electrification may be able to increase train service, it cannot alone accommodate the increased development. Bus transit is limited in San Mateo County as funding sources are limited.

Nearly a decade ago, Peninsula communities acknowledging these development trends, travel infrastructure constraints and travel demand challenges developed the Grand Boulevard Initiative (GBI). The GBI set forth to reimagine and reinvent ECR as a regional serving multi-modal transportation corridor focused on bus, bicycle and pedestrian travel modes, but also accommodating vehicles. The proponents and stakeholders recognized that the current width of the corridor was narrow in a couple of communities and that this would present a unique challenge to meet the needs of a regional corridor. Most of ECR corridor is 6 lanes and can readily accommodate multi-modal travel (dedicated bus lane, bicycle lane and traffic lane in each direction). The ECR Renewal project right-of-way is only approximately 70 feet in width allowing the current 4 travel lanes with adjacent sidewalks and landscaping areas. This right-of-way width appears to extend from Millbrae to San Mateo (terminus at Tilton Avenue just outside the ECR Renewal project boundary by a couple of blocks).

Caltrans officials currently estimate the proposed project to cost in the neighborhood of \$100,000,000 (2021 - assuming no cost overruns due to material prices, inflation and unforeseen subsurface field conditions?), not including undergrounding utilities proposed by Burlingame officials to cost an estimated additional 25,000,000+ (2021). Even without the utility undergrounding, the ECR Renewal project appears to be one of the costliest such projects in the Bay Area Region. Paraphrasing from Caltrans representatives own words, given the cost and the time it has taken to get to this point in the project, this is a unique once in a lifetime opportunity. I concur. It is unlikely that after an expenditure of this magnitude and planting of permanent replacement trees, that opportunities to revisit this portion of ECR for multi-modal uses will be imposing. ECR is in an optimal location on the Peninsula to provide increased travel capacity to accommodate growth. No other north-south street corridors can be retrofitted (at reasonable cost both social and economic) to accommodate the existing and projected regional travel demand.

If both the Federal and State governments are considering devoting this much taxpayer money into a single road reconstruction project with primarily local serving, but limited regional benefits, then project objectives need to be broadened and updated to reflect the regional changes that have occurred over the past several decades and the GBI vision, and refocus the project on benefiting the regional community travel needs.

The proposed project needs to be re-thought and expanded to include multi-modal. It is possible that even without expanding the right-of-way width, that multi-modal needs can be included and that Burlingame's desire to provide trees can be accommodated.

Burlingame's desire to preserve a tree lined corridor without expanding opportunities for other forms of travel serving the needs of the Peninsula community is a local luxury.

Response to Comment Steve Carlson-2

Thank you for your comment. Please see Master Response 1.

Comment Steve Carlson-3

The DEIR/EIS is incomplete and should be revised to incorporate key project and environmental data essential to defining the project and to evaluate the impacts. The DEIR/DEIS text is uneven, unbalanced and incomplete and the project evaluation is too focused on one area to the exclusion of other key areas. Based on project representatives. As such, the DEIR/EIS should be considered a Preliminary DEIR/EIS.

Response to Comment Steve Carlson-3

This comment consists of a statement of opinion by the commenter, based on no evidence. The Draft EIR/EIS was prepared according to standards adopted by Caltrans in full compliance with both NEPA and CEQA regulations. Caltrans conducted public outreach and requested public input on the scope and purpose and need of the project (see Chapter 5). Caltrans took public comments into consideration prior to preparation of the Draft EIR/EIS. The logical termini are described in Section 1.3.3 of the Draft EIR/EIS.

Comment Steve Carlson-4

The project description is very general and is too limited in details regarding both existing and proposed conceptual plans. Details regarding infrastructure both underground and above ground are not provided. Scaled and dimensions plans of the corridor are not included. Data which lends itself to being presented in tables and matrices and linked to maps (e.g. light poles, trees) which would facilitate comprehension of the project are not included even though Caltrans representatives stated that the data exists but was not provided.

Response to Comment Steve Carlson-4

Chapter 2 of the Draft EIR/EIS describes the proposed improvements to the roadbed, intersections, utilities, sidewalks, and trees, along with details related to the construction activities and regulatory requirements. The description includes both a written narrative and conceptual schematics. These schematics are based on preliminary layout sheets included in the Draft Project Report completed for the proposed project. The information presented is sufficient to provide a full analysis of potential effects of the project. Additional engineering detail and replacement tree locations would be determined in coordination with project engineers, utilities, SHPO, and other jurisdictions, and is not expected to result in identification of any additional environmental effects or change the results of the Caltrans' environmental analysis.

Comment Steve Carlson-5

Impacts identification and evaluation are largely focused only the community of Burlingame (to the near exclusion of both Millbrae and San Mateo even though they comprise a 1/3 of the project's 3+ mile length). The exclusion of key stakeholders, including but not limited to corridor

residents in San Mateo and Millbrae, representatives of lower income areas and communities of color, and transit, pedestrian, bicycle and multi-modal advocates is glaring.

Response to Comment Steve Carlson-5

As discussed in Sections 5.2.2 and 5.2.3, stakeholders and local community members were given comment opportunities in the form of the project website, local in-person meetings, mail, and email. Also, please also see response to Comment Diane Condon-2 for further information on outreach conducted for the proposed project.

The analyses for all of the environmental topic areas in the Draft EIR/EIS include potential impacts throughout the entire 3.6-mile-long segment of SR 82 within the project corridor, which includes the cities of San Mateo, Burlingame, and Millbrae. Since the project is linear in nature, the impact analyses are, necessarily, focused on the locations where certain specific effects would occur. For example, as stated on Draft EIR/EIS pages 1-3, the Howard-Ralston Eucalyptus Tree Rows (a historic resource listed on the National Register of Historic Places [NRHP]), extend along El Camino Real from Peninsula Avenue to Ray Drive/Rosedale Avenue, in the City of Burlingame. Therefore, the analysis of this particular resource (the tree rows) is necessarily focused on its location in Burlingame. However, the Draft EIR/EIS analysis as a whole includes not just the Howard-Ralston Tree Rows, but also all environmental resources in the jurisdictions within the project limits.

Comment Steve Carlson-6

The project's southerly boundary appears to be arbitrarily terminated at East Santa Inez Avenue, when similar conditions exist in San Mateo south to Crystal Springs Road. The reasoning for excluding this area is based on inaccurate information that the area already complies with Caltrans and ADA standards.

Response to Comment Steve Carlson-6

As described in Draft EIR/EIS Section 1.3.3, the pavement condition along El Camino Real was the primary factor in choosing the project limits. In 2010, the area south of East Santa Inez Avenue was repaved and is in generally good condition. The comment does not specify which information about Caltrans and ADA standards is inaccurate or provide any information in support of the claim of inaccuracy.

Comment Steve Carlson-7

Information is lacking or inaccurate regarding the project's compliance with local plans - leading to incorrect impact assessment. The DEIR/EIS does not identify key and relevant plans and policies that significantly affect the project's design.

Response to Comment Steve Carlson-7

Draft EIR/EIS Section 3.1.1 provides information related to the project's consistency with applicable local plans and policies, including the Grand Boulevard Multimodal Transportation Corridor Plan and the City of San Mateo Citywide Pedestrian Master Plan. The comment does not state which key and relevant plans were not included in Section 3.1.1.

Comment Steve Carlson-8

Identification of and evaluation of pedestrian improvements at several San Mateo corridor intersections are not included.

Response to Comment Steve Carlson-8

The commenter does not specify what information has been omitted regarding pedestrian improvements or specific San Mateo corridor intersections.

Comment Steve Carlson-9

Potential Federal, State and local policy conflicts regarding protection or removal of non-native and non-native invasive trees is absent.

Response to Comment Steve Carlson-9

Regulations applicable to the proposed project related to invasive species are included in Section 3.3.3 of the Draft EIR/EIS. Please see response to Comment Katherine Moore-3 for a discussion of invasive trees.

Comment Steve Carlson-10

Scant attention is included regarding trees, intersection, infrastructure, pavement markings, corridor lighting.

Response to Comment Steve Carlson-10

The commenter provides no details as to the information that he believes has been omitted, related to “trees, intersection, infrastructure, pavement markings, corridor lighting.” As discussed in Section 3.1.6 of the Draft EIR/EIS, the analyses of the Build Alternative have thoroughly discussed trees, intersections, infrastructure, pavement markings, and lighting from a Visual/Aesthetic perspective. Additional information regarding project features described in the comment are addressed in responses to subsequent comments submitted by Steve Carlson.

Comment Steve Carlson-11

The EIR/EIS project description is far too general and makes it impossible for reviewers to clearly understand the project nor the impacts. The DEIR/EIS project description should be presented in sufficient detail that reviewers can understand the full scope of the project.

Relevant key information needs to be provided so that reviewers can understand the project impacts, understand the facts leading to the project proponent’s impact conclusions and equally important so that reviewers can draw their own conclusions based on the same evidence.

The description is lacking in details regarding the existing and proposed roadbed improvements, intersection design, utilities, sidewalks, nearby bicycle facilities and trees.

For example, the project identifies approximately 700 trees line the ECR corridor and that 100 of these trees are located in the communities of San Mateo and Millbrae. Nowhere is a scaled map included or a matrix provided that provides an inventory of the trees, their location, species, diameter, height, age, condition nor value. In the impact analysis it is noted that 300 trees will need to be removed and possibly more depending on project design details which will not be developed until after the EIR/EIS is self-certified by Caltrans. Similarly, it is mentioned that trees in Millbrae and San Mateo will need to be removed, but none are identified. The project design should be detailed sufficiently that reviewers can understand the impacts and opportunities for alternative solutions.

In that regard, it is important for Caltrans to include the following information:

1. A scaled and dimensioned map of the entire corridor that includes a delineation of the right-of way and adjacent properties and improvements, the existing improvements within the right-of-way

including roadbed, pedestrian sidewalks, ADA compliant and non-compliant ramps, intersections, location of all utilities (both above ground and below ground), lights, pavement striping (including stop bars and cross walks), intersection control signs, signals and appurtenant devices.

2. A scaled and dimensioned corridor map that includes a delineation of the right-of way and adjacent properties and improvements, the proposed improvements within the right- of-way including roadbed, pedestrian sidewalks, ADA compliant ramps, intersections, location of all utilities (both above ground and below ground), lights, pavement striping (including stop bars and cross walks), intersection control signs, signals and appurtenant devices.

Response to Comment Steve Carlson-11

The El Camino Real Roadway Renewal Project Draft EIR/EIS includes sufficient details to present a thorough and complete project description, such that the public and agency decisionmakers can provide meaningful input on the potential environmental impacts of the project.

The problems with the existing roadbed, intersection design, utilities (specifically drainage), sidewalks, and trees are described in detail in Chapter 1 of the Draft EIR/EIS. These descriptions include a written narrative, representative photographs, and conceptual schematics sufficient to illustrate the problems that are proposed for remediation and improvement. Chapter 2 of the Draft EIR/EIS describes the proposed changes to the roadbed, intersections, utilities, sidewalks, and trees, along with details related to the construction activities and regulatory requirements. The descriptions include both a written narrative and conceptual schematics.

The level of detail requested in the comment (i.e., scaled and dimensioned maps showing every property, tree, utility, storm drain, and pavement/sidewalk section) is equivalent to a set of construction plans that would be sent out to a contractor for bid, which is not required for the public or agency decisionmakers to understand and provide meaningful comments on the proposed project and its potential environmental impacts. Chapter 2 also notes that the project would be designed and constructed based on the 2018 Caltrans Standard Specifications, which contain details that are used on every Caltrans project.

With regard to the commenter's request for details related to nearby bicycle facilities, please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

As stated in Draft EIR/EIS Chapter 2, Caltrans has extensively studied the trees within the project limits to determine how many may need to be removed. A detailed description of this evaluation is presented in Draft EIR/EIS Appendix F, which consists of a Tree Removal Evaluation and Replanting Plan. Chapter 2 of the Draft EIR/EIS further states that an estimated 300 to 350 of the approximately 700 trees in the project limits would be removed, including approximately 250 trees that contribute to the Howard-Ralston Eucalyptus Tree Rows.

A tree inventory was prepared as part of the Caltrans preliminary studies, and that information was considered in the impact analysis. As stated in Section 3.3 of the Draft EIR/EIS, "The project would result in the removal of 300 to 350 trees out of approximately 700 trees in the project limits. About 250 of these trees contribute to the Howard-Ralston Eucalyptus Tree Rows—less than half of them are original (150+ years old) eucalyptus and the rest are younger trees of various species and ages. Tree removal would occur only along the sidewalks within the project limits (about 38 acres). A tree removal schedule will be decided in later phases with

coordination among design engineers, landscape architects, and the SHPO. Trees will be replaced at a 1:1 ratio with various species to promote biodiversity.” The exact trees to be removed requires coordination among design engineers, landscape architects, and the SHPO, and such coordination cannot occur until the design phase.

The determination of the exact trees to be removed cannot be done until detailed design and coordination takes place. Many factors need to be considered when determining which exact trees need to be removed. This includes exact location and dimensions of sidewalks, locations and potential relocation of utilities, location and dimensions of curb ramps, details of drainage work, etc. This level of information will not be available until PS&E when all factors are considered and laid out in the plans. It is not possible to identify the specific trees to be removed until additional surveys (including subsurface investigation) and coordination are completed during PS&E. Sufficient information has been provided in the Draft EIR/EIS such that an appropriate impact conclusion can be reached and the public and agency decisionmakers can provide meaningful comment. No further information related to trees and tree removal is necessary in the project description.

As stated in Chapter 1 of the Draft EIR/EIS, between 2014 and 2017, Caltrans undertook preliminary investigations to evaluate the condition of the roadway, sidewalks, and other infrastructure (Caltrans 2014, Caltrans 2016a, Caltrans 2017a). Caltrans then included funding for these items in its State Highway Operation and Protection Program (SHOPP). Information related to areas along the roadway that require rehabilitation/resurfacing is provided Chapter 1 of the Draft EIR/EIS and Chapters 1 and 2 both indicate that the area needing pavement rehabilitation/repairs extends along El Camino Real from post mile (PM) 12.3, East Santa Inez Avenue, in the City of San Mateo, to PM 15.9, Millbrae Avenue, in the City of Millbrae – a distance of approximately 3.6 miles. This area is shown in Draft EIR/EIS Figure 1.1-1.

For all of the reasons stated above, the Draft EIR/EIS project description meets the requirements of CEQA and NEPA, and provides the public and agency decisionmakers with enough information such that meaningful comments as to the potential environmental impacts of the proposed project can be provided. Therefore, no revisions to the project description are necessary.

Comment Steve Carlson-12

The project description should identify areas along the roadway that are in disrepair and/or do not meet Caltrans current design standards. In this regard the text should be modified to include the following information:

An inventory of portions of sidewalks not in compliance with the ADA and Caltrans standards for obstructions, width, surface irregularities, cracks, offsets, curb height, and ramp design and placement.

In this regard, it is important for the EIR/EIS to include the following information:

1. A scaled and dimensioned diagram of the existing roadbed and pedestrian sidewalks showing existing and proposed gradients and cross slope. The diagram should be keyed to a matrix that provides much greater detail of the gradient and cross slope at regular intervals and for each intersection.

2. A scaled and dimensioned corridor plan showing road bed and pedestrians walkways and ramps that are not in compliance with Caltrans standards and with ADA standards.

Response to Comment Steve Carlson-12

Please see the response to Comment Steve Carlson-11 regarding the level of detail in the project description.

Comment Steve Carlson-13

The design does not need developed to a level of ready for contract. Communities throughout California routinely review public and private project proposals that are of sufficient conceptual design details to be able to evaluate the impacts of a particular proposal. Caltrans approach is akin to a developer submitting a proposal for a building including only a few sketches and without including and information regarding floor plans building exteriors and landscape plans and advising the Community that they will work out the design at the Building Permit stage. Such projects would be rejected as an incomplete project.

Without knowing which trees, especially those in San Mateo, are to be removed a reviewer is left to conjecture – changing the impact rating to Unknown.

The analysis underlying the impacts and Mitigation Measure is uneven, limited and does not appear to be closely linked to facts and data included in the DEIR/EIS. Replacing mature 75 foot tall trees with 5 gallon trees that will never approximate the height nor width of the existing trees and that the impact will not be mitigated until the new trees have grown over a 20 year time span is contrary to the notion of adequate mitigation. The visual effect of mature trees cannot be “mitigated” in the short term, unless replaced with a mix of trees of more mature size providing more immediate visual impact (e.g. a mix of 15 gallon, 24 inch, 36 inch, and 48 inch box trees). Considering the turnover of local population and high median age few will be present in 2045 to witness and benefit from the tree growth.

The ECR Renewal Project proposal focuses largely on the corridor portion in within Burlingame and Hillsborough town limits and does not devote the same level of attention to San Mateo and Millbrae communities.

Response to Comment Steve Carlson-13

Please see the response to Comment Steve Carlson-11 regarding the level of detail in the project design, including for tree removal.

As noted in the comment, the Draft EIR/EIS does not state that mature 75-foot-tall trees will be replaced with 5-gallon trees. However, when mature trees are replaced with smaller, younger trees, it will take time for the trees to grow. Section 3.1.5 of the Draft EIR/EIS describes, and illustrates with visual simulations, the fact that visual impacts will be greater when the trees are younger, will be less apparent as the trees grow, and will be reduced to a moderate level once the trees reach full maturity.

As stated in Draft EIR/EIS Section 3.1.5.4, avoidance, minimization, and mitigation measures have been proposed to reduce potential effects on existing trees. Measure VIS-1 requires implementation of design modifications, alternative construction practices, and protective measures to minimize effects on existing trees and soils.

In addition to reducing potential impacts on existing trees, Caltrans would incorporate measures to replace any vegetation that may be removed. Per VIS-2, replacement street trees would be planted in roadside areas of the right-of-way consistent with horticultural and maintenance guidelines and safety and sight distance standards. Removed vegetation would be replaced at a 1:1 ratio provided there is adequate space within the roadside areas of the project limits within

Caltrans' right-of-way. Trees would be replaced with various species in order to promote biodiversity. Measures VIS-4 and VIS-5 include requirements for long-term survival of replacement trees.

Also, please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows and the response to Comment Steve Carlson-5 for a discussion of the level of detail in the Draft EIR/EIS.

Comment Steve Carlson-14

Alternatives

The DEIR/EIS does not accurately identify that City of San Mateo Bicycle Mast Plan does identify ECR as a bikeway that needs further review and community participants in the formulation of the San Mateo Plan identified ECR as a desirable bikeway. The GBI also explicitly identifies ECR as a primary multi-modal corridor opportunity which should include a bicycle travel. Because Caltrans allows bicyclists to use ECR it stands to reason that any roadway improvement should provide for needs and/or increased safety of bicyclists. Caltrans needs to revisit the Alternatives and reimagine ECR along the lines of the GBI with a multi-modal solution.

The Road Diet Alternative is not terribly realistic and appears more fabricated - it should be revised to include both pedestrian and bicycle facilities and maintain 4 travel vehicle travel lanes. In my experience having worked with local governments on the Peninsula with SamTrans, SamTrans cannot guarantee that its drivers will use bus turnouts (they will simply stop in the travel lane). In the past SamTrans representatives have taken the approach of informing communities that it will relocate a bus stop to a designated location, rather than working in advance with a community in a collaborative manner to plan routes and stops. In the long run, the turnouts in the long run would thus be a waste of resources.

The Alternatives should include a plan that provides more realistic multi-modal transportation improvements. This should be developed in collaboration with important stakeholders notably Bicycle and Pedestrian advocacy groups, GBI representatives and SamTrans representatives and representatives of all affected communities not just city officials and city staff.

The multimodal alternative could include all existing 4 travel lanes with a two-way 8 foot wide bicycle path on one side of the street and a 5 foot wide pedestrian sidewalk on the opposite (or an expanded 8 foot wide pathway on both sides of ECR combining pedestrians and bicyclists. Landscaping, including trees would be accommodated as a secondary objective.

The EIR/EIS does not provide clear explanation why the Millbrae portion of the project (0.7 miles in length) and a 6 lane median divided roadway, cannot be designed to include bicycle safety improvements – even if only 4 foot wide striped limit line on each side of the roadway.

Response to Comment Steve Carlson-14

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives and Response to Kat Wortham-6. This comment proposes highway widening that would not allow room for replanting of the trees or historic tree row that currently line the sidewalks; it therefore would result in substantially more severe adverse environmental impacts than the Build Alternative. Also, the City of San Mateo Bicycle Master Plan does not include objectives, goals, or policies that are applicable to the proposed project, and were therefore not addressed further in the Draft EIR/EIS. Regarding potential bicycle improvements within the Millbrae portion of the project limits, during the design phase, Caltrans will work with the cities of Burlingame and Millbrae on potential improvements to the pavement

striping to include bicycle friendly features. However, it should be noted that 8-foot Class I bicycle paths and 5-foot sidewalks do not meet Caltrans Highway Design Manual standards.

Comment Steve Carlson-15

Trees

The DEIR/EIS provides extensive tree information but it is summarized in a form that reviewers cannot determine which trees are likely to be removed.

An inventory of all trees within the corridor or likely to be affected by the proposed ECR project should be included in the DEIR/EIS.

In this regard, it is important for the EIR/EIS to include the following information:

1. A scaled and dimensioned corridor map that includes a delineation of the right-of way and adjacent properties and improvements showing all trees. All trees should be numbered and a symbol identified if they are preliminarily slated for removal. This information should be keyed to a matrix or table of all the trees with information including identifying the specie and whether native or non-native, age, size, condition, and removal likelihood.

Based on project proponents representatives comments this information already exists, but has not been included in the DEIR/EIS.

Response to Comment Steve Carlson-15

The analysis provided in the Draft EIR/EIS was summarized from the VIA prepared for the project. The VIA includes preliminary mapping of the anticipated tree removals and is a publicly available document that was made available for public review during the public comment period for the Draft EIR/EIS. For convenience, the VIA with the preliminary mapping is attached to this document as Appendix J. Since the VIA was prepared, a further clarification of the trees designated for either preservation or removal has been provided in a Tree Preservation Assessment by an experienced professional arborist. The Tree Preservation Assessment is included as Appendix K to the Final EIS/EIR. Final determinations for tree removals are being developed with the input of an independent arborist and may be revised as conditions are discovered during construction. As described in the response to Comment Steve Carlson 11, the exact trees to be removed requires coordination among design engineers, landscape architects, and the SHPO, and such coordination cannot occur until the design phase. It is not possible to identify the specific trees to be removed until this additional surveys and coordination are completed during PS&E. Many factors need to be considered when determining which exact trees need to be removed. This includes exact location and dimensions of sidewalks, locations and potential relocation of utilities, location and dimensions of curb ramps, details of drainage work, etc. This level of information will not be available until PS&E when all factors are considered and laid out in the plans. Sufficient information has been provided in the Draft EIR/EIS such that an appropriate impact conclusion can be reached and the public and agency decisionmakers can provide meaningful comment. No further information related to trees and tree removal is necessary in the project description.

Comment Steve Carlson-16

Non-native Species

Burlingame community's efforts to continue to protect portions of the ECR Trees is both legally and environmentally questionable. The Eucalyptus trees on Caltrans property were designated as

a Historic Resource in 2012. At some point the Eucalyptus trees have been identified as a non-native species and some as invasive species. It is my understanding that both Federal and State policy is to have the non-native and especially invasive species including trees, removed to improve the advantage of biodiversity and restore the native flora and fauna. In this sense, removal is an environmental imperative - meaning that the trees cannot be protected as a Historic Cultural Resource. To do so would be counterproductive to eradication efforts, is not environmentally sustainable and would establish an unwise environmental precedent.

Caltrans needs to immediately contact the appropriate Federal and State agencies regarding the Eucalyptus trees and resolve the apparent legal issues before proceeding with the project into the public hearing and certification process.

Caltrans needs to provide a clear policy basis and legal basis on which it can override the apparent environmental objectives and policies of other Federal and State agencies. The text should be modified to include identification of Federal and State Agencies with relevant environmental policies and/or permitting authority and meet and confer with their representatives to resolve this apparent issue.

The impact of removal of the Eucalyptus trees should be revised to No Impact. The DEIR/EIS needs to be revised to include this information and recirculated.

Response to Comment Steve Carlson-16

Please see the response to Comment Katherine Moore-3 for a discussion of eucalyptus trees as invasive species. No further revision of the Draft EIR/EIS is required and recirculation of the Draft EIR/EIS is not necessary.

Comment Steve Carlson-17

San Mateo ECR Intersections

The DEIR/EIS does not provide information regarding several project area intersections situated in the City of San Mateo that have hazardous conditions and without improvements are unsafe for pedestrians. The intersections of concern are as follows:

1. ECR/Peninsula Avenue
2. ECR/Barroilhet Avenue
3. ECR/Warren Road
4. ECR/Clark Drive (both hook ramps)
5. ECR/St. Johns Court
6. ECR/Poplar Avenue
7. ECR/Bellevue Avenue
8. ECR/East Santa Inez
9. ECR/Monte Diablo Avenue

Response to Comment Steve Carlson-17

This comment contains introductory statements to more detailed comments that follow. See the responses to Comment Steve Carlson-19 through Comment Steve Carlson-29 below.

Comment Steve Carlson-18

ECR/Peninsula Avenue

The intersection is unusual in that it is somewhat offset and integrates three streets. This condition is complicated by existing and future heavy volume of traffic travelling along ECR and Peninsula Avenue. The ECR crosswalk at Peninsula is 60 feet in width. The intersection is adjacent to a Senior Citizen Assisted Living Residential Facility and the adjacent medium density residential areas to the east, west and south have a larger portion of low income families and older residents. These families are more likely to be reliant on public transit provided on ECR by SamTrans the nearest south bound stop situated south on ECR approximately 700+ feet (not including the crosswalk). Local policies require the installation of high visibility crosswalks adjacent to the senior citizen facilities and increased travel time allotted for seniors at crosswalks. The DEIR/EIS does not indicate the current crosswalk timing, if the crosswalks at ECR/Peninsula Avenue will have high visibility crosswalks, or if the signal timing will be adjusted for seniors.

The San Mateo Bike Master Plan identifies Peninsula Avenue as bike lanes between Peninsula Avenue overpass at US Highway 101 and Highland Avenue. The EIR/EIS does not reflect this information.

The DEIR/EIS text should be amended to address the special needs of senior pedestrians at this intersection and given the width of the crosswalks evaluate if the Caltrans standards for seniors will be adequate or if a slower rate is required. Diagrams indicating the proposed type of crosswalk markings and additional features such as advance stop bars on ECR will be provided.

The DEIR/EIS needs to be amended to discuss how the proposed project will comply with the San Mateo Bike Master Plan. Because bicycles are allowed to utilize ECR and that Highland Avenue is only 650 approximately feet east of ECR, the proposed plan should include at a minimum wayfinding signage indicating the Peninsula Avenue bicycle lanes.

Response to Comment Steve Carlson-18

Please see the response to Comment Steve Carlson-14 and the response to Comment Kat Wortham-6 for a discussion of the City of San Mateo Bicycle Master Plan.

As described in Chapter 2 of the Draft EIR/EIS, the project includes upgrades to all existing sidewalks within the project limits comply with ADA standards. In addition, all crosswalks would be marked with high-visibility paint (composed of one layer of thermoplastic and two layers of glass beads) following project construction. The project includes the installation of accessible pedestrian signals (APS) and countdown pedestrian signals (CPS) as well as pedestrian hybrid beacons at various intersections.

The APS would provide an audible and vibrating signal designed to make street crossings safer for people who are elderly, blind, deaf, or who have low vision. These signals provide information in non-visual formats (e.g., audible tones, speech messages, and/or vibrating surfaces) designed to increase awareness for all pedestrians, which can lead to fewer pedestrian-related collisions with vehicles. The APS would be integrated into the pedestrian pushbutton detector, so the audible tones and messages would come from the pushbutton housing and have a pushbutton locator tone and tactile arrow. These electronic buttons are actuated by pedestrians to change traffic signal timing to accommodate pedestrian crossings. Locator tones would be used to help pedestrians with visual impairments find the pushbuttons that also activate CPS. CPS inform pedestrians of the number of seconds remaining in the pedestrian crossing time and reduce the number of pedestrians caught in the crosswalk at the end of the cycle.

Pedestrian hybrid beacons would be located at uncontrolled intersections where there is no traffic signal. A pedestrian hybrid beacon is a traffic control device designed to help pedestrians safely cross busy or higher-speed roadways at midblock crossings and uncontrolled intersections. The beacon head consists of two red lenses above a single yellow lens. The lenses remain "dark" until a pedestrian desiring to cross the street pushes the call button to activate the beacon. The signal then initiates a yellow to red lighting sequence consisting of steady and flashing lights that directs motorists to slow and come to a stop. The pedestrian signal then flashes a WALK display to the pedestrian. Once the pedestrian has safely crossed, the hybrid beacon again goes dark.

During the design phase, Caltrans will coordinate with jurisdictions within the project limits on the inclusion of additional improved bicycle and pedestrian crossings at all El Camino Real intersections within the project limits. These improvements will include:

- Realignment of existing crosswalks
- Advance stop pavement markings
- Adjusting signal timing to provide for a leading pedestrian interval
- Consideration of signal timing adjustments

Prohibition of right turns on red lights if feasible. These improvements will increase pedestrian and bicycle safety and access within the project limits, including at the intersection of El Camino Real and Peninsula Avenue and the other intersections referenced in Comment Steve Carlson-18 through Comment Steve Carlson-26.

During the design phase, licensed traffic safety engineers will review and determine the design is in accordance with standards set forth in the Highway Design Manual and Traffic Safety Manual. These surface-level pavement markings and other safety enhancements are not anticipated to result in environmental impacts.

Also, please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives. No additional revision of the Draft EIR/EIS is necessary to address the commenter's proposal for further pedestrian and bicycle enhancements, because the Draft EIR/EIS appropriately and comprehensively discloses the anticipated environmental effects of the project.

Comment Steve Carlson-19

ECR/Barroilhet Avenue

The curb-to-curb width of Barroilhet Avenue is approximately 28 feet – but the pedestrian crosswalk is approximately 60 feet nearly 1.5 times as wide as ECR. Complicating this is that the intersection is design is at a shallow angle and on a partial curve approximately 150 feet from the ECR Peninsula Avenue intersection which appears to restrict vehicle sight line. This intersection design allows southbound ECR traffic to exit onto Barroilhet Avenue at speed and makes it difficult for pedestrians. This is a challenging if not hazardous condition for pedestrians to cross especially those headed south along ECR. The current condition is compounded by the lack of an ADA compliant ramp and that the street surface at the curb gutter is substantially lower than the roadbed leading to a steep gradient from gutter to crown of the road bed.

Because of the restricted sight line motorists attempting to make a left turn onto northbound ECR creep out across the pedestrian crosswalk area making crossing more challenging.

The DEIR/EIS needs to be amended to address this hazardous condition. The text needs to be amended to include an evaluation of the current condition and solutions developed to improve pedestrian safety. A scaled and dimensioned plan of the existing and proposed preliminary design of the improvement should be included for review (e.g., a landscaped median island/refuge could be created combined with reworking the north corner to provide a 90 degree corner return requiring exiting vehicles to slow down to negotiate the turn). The plans should include high visibility pavement markings and street lighting at sufficient brightness to aid pedestrian crossing during the hours of darkness and inclement weather.

Response to Comment Steve Carlson-19

Please see the responses to Comment Steve Carlson-18 for a discussion of pedestrian improvements proposed within the project limits and Comment Steve Carlson-11 regarding the request for scaled and dimensioned plans.

Comment Steve Carlson-20

ECR/Warren Road

The curb-to-curb width of Warren is approximately 90 feet – nearly twice as wide as ECR. Complicating this is that the curb design is shallow (reflecting more of a landscape plan of the original residential subdivision dating back as far as the 1890's). This intersection design allows southbound ECR traffic to exit onto Warren Road at speed. This is a challenging if not hazardous condition for pedestrians to cross especially those headed south along ECR. The current condition is compounded by the lack of an ADA compliant ramp and that the street surface at the curb gutter is substantially lower than the roadbed leading to a steep gradient from gutter to crown of the road bed.

The DEIR/EIS needs to be amended to address this hazardous condition. The text needs to be amended to include an evaluation of the current condition and solutions developed to improve pedestrian safety. A scaled and dimensioned plan of the existing and proposed preliminary design of the improvement should be included for review (e.g. a landscaped median island/refuge could be created combined with reworking the north corner to provide a 90 degree corner return requiring exiting vehicles to slow down to negotiate the turn). The plans should include high visibility pavement markings and street lighting at sufficient brightness to aid pedestrian crossing during the hours of darkness and inclement weather.

Response to Comment Steve Carlson-20

Please see the responses to Comment Steve Carlson-18 for a discussion of pedestrian improvements proposed within the project limits and Comment Steve Carlson-11 regarding the request for scaled and dimensioned plans.

Comment Steve Carlson-21

ECR/Clark Drive

Clark Drive was the original project entry to an exclusive large lot low density residential development in the late 19th century, but also provides access to portion of the Town of Hillsborough. The entry is split into two shallow angle "hook" ramps that are each two-way and intersection at ECR in shallow curves. The curb-to-curb width of each street is approximately 19 feet to 20 feet, however the crosswalks parallel to ECR are nearly 90+ feet – nearly twice as wide as ECR. Complicating this is that the curb design is shallow (reflecting more of a landscape plan of the original residential subdivision dating back as far as the 1890's). This intersection design allows southbound and northbound ECR traffic to exit onto Clark Drive at speed. The crosswalk distance, the exit speed, two way traffic make these two streets a challenging, if not hazardous, condition for pedestrians to cross. The current condition is compounded by the lack of an ADA

compliant ramps and that adjacent to each of the intersections are multi-family residential developments that have two way driveways at the intersections of ECR and Clark Drive.

While the two hook ramps are approximately 250 feet apart (and 250 feet from Bellevue Avenue intersection with ECR) the configuration requires that motorists travel against the traffic to access the hook ramps. This is a vehicular hazard for traffic on ECR.

The EIR/EIS needs to be amended to address these hazardous conditions. The text needs to be amended to include an evaluation of the current condition and solutions developed to improve pedestrian safety. A scaled and dimensioned plan of the existing and proposed preliminary design of the improvement should be included for review. Various solutions including relocating the pedestrian crosswalks a few feet away from ECR to cross Clark Drive at a 90 degree angle incorporated with relocating or adding a stop sign before the crosswalk, providing a landscaped median island/refuge, converting the hook ramps into one way streets – the northerly street being the entrance and the southerly street being the exit onto ECR. One of the multi-family buildings could be restricted to a single driveway rather than the current drop off u-shape two driveway configuration. The plans should include high visibility pavement markings, advance stop bars, location of stop signs, and street lighting at sufficient brightness to aid pedestrian crossing during the hours of darkness and inclement weather.

Response to Comment Steve Carlson-21

Please see the responses to Comment Steve Carlson-18 for a discussion of pedestrian improvements proposed within the project limits and Comment Steve Carlson-11 regarding the request for scaled and dimensioned plans.

Comment Steve Carlson-22

ECR/St. Johns Court

Hybrid crossing should be established at St. John Court and ECR. The ECR is lined with apartments and medium density multifamily rentals to the immediate west and east. This is a neighborhood with a larger concentration of immigrants, low income households, older and non-white working class households. Are families are more likely to utilize ECR transit provided by SamTrans going north and south – and one of the few all night bus transit routes. In the last couple of years SamTrans relocated the northbound bus stop from Bellevue Avenue to St. John's Court to more closely align with the southbound stop on ECR and to increase distance from the Poplar Avenue northbound stop. While the bus stop location makes sense from a transit operation, without a controlled crosswalks, pedestrian are exposed to an unsafe condition. The alternative of requiring pedestrian to walk 700+ feet to the Peninsula Avenue intersection and double back another 700+ feet is not a suitable solution considering ECR is only 46 feet in width.

An illuminated pedestrian crosswalk (across ECR at St. John's Court) would greatly enhance pedestrian safety. From personal experience during commute hours it has a constant stream of traffic in both directions making it difficult to cross at this location without running across the roadbed in between several signal cycles. The signal cycles at Peninsula and Bellevue Avenues do not appear to include the pedestrians into the signal timing. During commute hours in particular pedestrians often need to wait several cycles until there is sufficient break in the traffic to safely venture across. However, slower paced seniors or others would not likely be able to safely cross the street in time to avoid the traffic. The DEIR/EIS should be revised to include a Hybrid signal at this T-intersection and provide appropriate plans showing the proposed improvements.

Response to Comment Steve Carlson-22

Please see the responses to Comment Steve Carlson-18 for a discussion of pedestrian improvements proposed within the project limits and Comment Steve Carlson-11 regarding the request plans.

Comment Steve Carlson-23

ECR/Bellevue Avenue

The intersection needs to be improved to achieve compliance with Caltrans and ADA standards including ramp design, high visibility and advance stop bar pavement marking and pedestrian countdown signals. This crossing is identified in the San Mateo Pedestrian Master Plan as a Safe –Routes-to-School and in the pre-covid era, the intersection was augmented with adult crossing guards. Personal observation is that the school age children and accompanying adults were not often able to cross ECR without the crossing guard in the allotted signal time. Crossing at this location is made all the more challenging during school drop-off and pick-up due to the increase traffic headed to and from San Mateo Park Elementary school and the heavier than normal left turns headed northbound. Motorists also often encroach into the crosswalk impeding pedestrian crossing.

Bellevue Avenue is identified in the San Mateo Bike Master Plan as being converted from a bike route to a bicycle boulevard. The DEIR/EIS does not appear to incorporate this information.

The DEIR/EIS needs to be amended to identify that the intersection signal will be adjusted to provide increased timing for children, that the crosswalk safety improvements will be upgraded to include high-visibility crosswalk markings and advance stop bars, that the level of illumination will be sufficiently bright to provide safe crossing, and to show how the proposed plan will comply with the San Mateo Bike Master Plan. The text should be amended to identify the type of bicycle detectors to be utilized (e.g. in-ground or camera). While there appear to be in ground detectors, they do not appear to function and especially not with carbon fiber frames. Additionally, the DEIR/EIS should indicate if bicycle detectors will be installed to facilitate safe crossing for cyclists. Plans should be included showing the proposed pavement markings and advance stop bars and bicycle pavement markings including the San Mateo bicycle boulevard pavement markings and any proposed Caltrans “greenbox” markings.

Response to Comment Steve Carlson-23

Please see the response to Comment Steve Carlson-18 for a discussion of pedestrian improvements proposed within the project limits and Comment Steve Carlson-11 regarding the request for plans.

Comment Steve Carlson-24

ECR/Poplar Avenue

The intersection needs to be improved to achieve compliance with Caltrans and ADA standards including ramp design, high visibility and advance stop bar pavement marking and pedestrian countdown signals. This crossing is identified in the San Mateo Bicycle Master Plan as a Class II bicycle lane extending from Delaware Avenue (east of ECR) to the intersection of Poplar Avenue. The Poplar Avenue lanes would convert to a bike boulevard west of ECR. The City intends to improve a portion of the new bike way between Delaware Avenue and ECR in 2021.

The intersection is offset resulting in longer crosswalks and making more hazardous for pedestrians and bicyclists. Motorists, making left turns onto ECR from westbound Poplar Avenue traveling southbound on ECR, often do not yield the right-of way to pedestrians nor to bicyclists. I can personally attest as a long time experienced cyclist I am more cautious when travelling east

along Poplar Avenue at this intersection because motorists making left turns often start making the left turn from the crosswalk on the east side of ECR (rather than from the middle of the intersection). Crossing at this location is made all the more challenging given the heavier traffic on Poplar Avenue (an arterial roadway connection to US 101 southbound) and the grade changes from north to south and east to west and the proximity to the intersection of Poplar and Wisnom Avenues (75 feet east of ECR).

The DEIR/EIS needs to be amended to identify the intersection unique conditions and evaluate the safety hazardous associated with the intersection and identify safety improvements to reduce traffic conflicts with other motorists, pedestrians and bicyclists. Crosswalk safety improvements should include high-visibility crosswalk markings with advance stop bars, adequate level of illumination at a brightness level to provide safe pedestrian and bicyclist crossing. Additionally, the signal phasing should be adjusted to and a left turn signals should be added for west and east bound traffic on Poplar Avenue to eliminate conflicts between east and west bound motorists and east bound traffic (including pedestrians and bicyclists).

With the exception of the eastside crosswalk across Poplar Avenue, because of the longer crossing distances for the tree remaining crosswalks (between 72 feet and 85 feet) the current and future signalized crosswalk timing should be identified and a determination if the proposed timing is adequate to allow for safe pedestrian and bicyclist crossing. The text should be amended to identify the type of bicycle detectors to be utilized (e.g. in-ground or camera). While there appear to be in ground detectors, they do not appear to function and especially not with carbon fiber frames. Additionally, the EIR/EIS should indicate if bicycle detectors will be installed to facilitate safe crossing for cyclists. Plans should be included showing the proposed pavement markings and advance stop bars and bicycle pavement markings including the San Mateo bicycle lane markings and any proposed Caltrans "greenbox" markings.

Response to Comment Steve Carlson-24

Please see the response to Comment Steve Carlson-18 for a discussion of pedestrian improvements proposed within the project limits and Comment Steve Carlson-11 regarding the request for plans.

Comment Steve Carlson-25

ECR/East Santa Inez

The intersection needs to be improved to achieve compliance with Caltrans and ADA standards including ramp design, high visibility pavement markings. This T- intersection is hazardous due to the use of exaggerated crown surface roadbed on both streets. The intersection is hazardous for northbound ECR traffic. At the posted speeds of 35 MPH the two crown surfaces creating abrupt gradient changes that could contribute to an accident for an unsuspecting or distracted motorist, or a compromised vehicle suspension. Inclement weather and hours of darkness only exaggerate this condition. This condition is compounded, given the close proximity to sidewalks and adjacent occupied structures. Motorists, making right turns onto and off of East Santa Inez Avenue from or to northbound ECR must substantially slow down to safely negotiate the turn or to access ECR.

The sidewalk ramps do not comply with ADA standards. The exaggerated crown surface roadbed does not lend itself to safe pedestrian travel as pedestrian at the base of the curb are positioned well below the roadbed facing an incline that appears to greatly exceed 2%

The DEIR/EIS needs to be amended to identify the intersection unique conditions, evaluate the safety hazardous associated with the intersection and identify safety improvements to improve motorist, pedestrian and bicyclist safety and compliance with ADA standards. Plans should be included showing the proposed intersection design including cross slopes, and crosswalk safety improvements including ADA compliant ramps, high-visibility crosswalk markings, and an adequate level of illumination at a brightness level to provide safe pedestrian crossing.

Response to Comment Steve Carlson-25

Please see the response to Comment Steve Carlson-18 for a discussion of pedestrian improvements proposed within the project limits and Comment Steve Carlson-11 regarding the request for plans.

Comment Steve Carlson-26

ECR/Monte Diablo Avenue

The intersection needs to be improved to achieve compliance with Caltrans and ADA standards including ramp design, high visibility pavement markings. This T- intersection is hazardous due to the use of exaggerated crown surface roadbed on both streets. The intersection is hazardous for northbound ECR traffic. At the posted speeds of 35 MPH the two crown surfaces creating abrupt gradient changes that could contribute to an accident for an unsuspecting or distracted motorist, or a compromised vehicle suspension. Inclement weather and hours of darkness only exaggerate this condition. This condition is compounded, given the close proximity to sidewalks and adjacent occupied structures. Motorists, making right turns onto and off of Monte Diablo Avenue from or to northbound ECR must substantially slow down to safely negotiate the turn or to access ECR.

The sidewalk ramps do not comply with ADA standards. The exaggerated crown surface roadbed does not lend itself to safe pedestrian travel as pedestrian at the base of the curb are positioned well below the roadbed facing an incline that appears to greatly exceed 2%.

The DEIR/EIS needs to be amended to identify the intersection unique conditions, evaluate the safety hazardous associated with the intersection and identify safety improvements to improve motorist, pedestrian and bicyclist safety and compliance with ADA standards. Plans should be included showing the proposed intersection design including cross slopes, and crosswalk safety improvements including ADA compliant ramps, high-visibility crosswalk markings, and an adequate level of illumination at a brightness level to provide safe pedestrian crossing.

Response to Comment Steve Carlson-26

The El Camino Real/Monte Diablo Avenue intersection is outside the project limits of the El Camino Real Roadway Renewal Project. No changes to this intersection are proposed.

Comment Steve Carlson-27

ECR/Baldwin Avenue and ECR/Tilton Avenue

The San Mateo Bike Mater Plan 2020 indicates that both Baldwin and Tilton will be improved with bicycle facilities. The DEIR/EIS should be amended to reflect this information and how the project will comply. Similar to the comments in the previous San Mateo intersections the text should be amended to include a brief discussion how the proposed project will comply, evaluate potential safety hazardous associated with the intersection and identify safety improvements to improve motorist, pedestrian and bicyclist safety and compliance with ADA standards. Plans should be included showing the proposed intersection design including cross slopes, and crosswalk safety improvements including ADA compliant ramps, high-visibility crosswalk markings, and an adequate level of illumination at a brightness level (e.g. 1 foot candle at the street surface) to provide safe pedestrian crossing and bicycle pavement markings.

Response to Comment Steve Carlson-27

The intersections of El Camino Real with Baldwin Avenue and Tilton Avenue are outside the project limits of the El Camino Real Roadway Renewal Project. No changes to these intersections are proposed.

Comment Steve Carlson-28

ECR Lighting

Neither the project description nor the DEIR/EIS identify nor evaluate the level of illumination of the existing ECR roadway, intersections and pedestrian walkways. Pedestrian and bicycle usage especially in urban areas, is more reliant on adequate street lighting for safety and security especially in more densely populated areas with more heavily traveled roadways (especially those with multiple driveways and cross streets).

The City of San Mateo Plans and policies contained in Circulation Element, Sustainable Streets Plan, Pedestrian Master Plan and Bikeways Master Plan envisions ECR as a landscaped multi-modal greenway that provides highway and pedestrian scaled light standards between Baldwin Avenue north to Peninsula Avenue. The analysis should identify how the plan will comply with the San Mateo Plan policies and identify any infrastructure constraints e.g. underground utilities.

The DEIR/EIS needs to be revised to include a scaled and dimensioned corridor map showing the current and future light standards. An illumination analysis of both current and proposed illumination levels measured at the road surface and sidewalk areas needs to be included. A diagram of lighting standards should also be included.

Response to Comment Steve Carlson-28

As discussed in the response to Comment City of San Mateo-6, while Caltrans is not required to comply with local regulations for construction projects on State right-of-way, in the interest of comity and cooperation, Caltrans will work closely with all of the jurisdictions within the project limits during the design phase to ensure that existing lighting potentially affected by project construction would be replaced in kind. In addition, Caltrans will work with local jurisdictions to consider replacement lighting that complies with applicable plans and regulations.

Comment Steve Carlson-29

Exaggerated Crown Road Surface

The DEIR/EIS does not provide information regarding the exaggerated crown surface configuration of the ECR road bed and the intersecting streets of East Santa Inez and Monte Diablo Avenues that exists south of Poplar Avenue to Tilton Avenue. The crown surface is difficult to drive and this is exacerbated by the narrow lanes and heavy traffic. Driving during night hours (little street illumination) and during inclement weather is all the more hazardous. These conditions are no better for bicyclists. During the public rollout of the EIR/EIS Caltrans representatives stated that these types of road conditions would be addressed during the design process (after the EIR/EIS is certified) and that the road way would be required to comply with Caltrans standards. I have reviewed Caltrans Highway Design standards which provide a numerous engineering standards, exceptions and caveats that I cannot conclude what the new road way would look like. Caltrans needs to provide a scale and dimensioned preliminary design scheme showing the proposed roadway including cross slopes, lane widths pavement markings etc. The approach of simply trust us is not the intent of CEQA nor NEPA. Both laws require full public disclosure of key relevant information including plans so that reviewers can understand and properly evaluate a proposed project. Without at least preliminary plans, reviewers cannot accurately determine if a proposed project is compliant with current Caltrans standards and if it addresses the stated concerns.

The DEIR/EIS does not include information regarding the existing nor the proposed pedestrian markings. While the text does indicate that the new markings will meet Caltrans standards little to no information is provided for each of the intersections in the ECR corridor. Reviewers are apparently required to be familiar with relevant Caltrans design standards (not included in the DEIR/EIS) to determine which designs are likely or appropriate. It is incumbent on Caltrans that

possess the technical resources and expertise to include roadway and intersection designs that will comprise the proposed project. For example it is not clear that advance bar marking will be included in ECR plans at all or if bicycle pavement marking such a “greenboxes” are to be provided, or if wayfinding signage will be included. The EIR/EIS should be amended to provide scaled and dimensioned plans of all existing and proposed intersections with pavement markings signage and controls.

Response to Comment Steve Carlson-29

Please see the response to Comment Steve Carlson-18 for a discussion of pedestrian improvements proposed within the project limits and Comment Steve Carlson-11 regarding the request for plans.

Comment Steve Carlson-30

Impacts

The Impact analysis is uneven and focuses largely on the effects likely to occur in Burlingame even though 1/3 of the project corridor is outside of Burlingame.

Response to Comment Steve Carlson-30

This comment consists of a statement of opinion by the commenter, based on no evidence. The analyses for all of the environmental topic areas in the Draft EIR/EIS include potential impacts throughout the entire 3.6-mile-long segment of SR 82 within the project corridor, which includes the cities of San Mateo, Burlingame, and Millbrae. Since the project is linear in nature, the impact analyses are, necessarily, focused on the locations where certain specific effects would occur. For example, as stated on Draft EIR/EIS pages 1-3, the Howard-Ralston Eucalyptus Tree Rows (a historic resource listed on the National Register of Historic Places [NRHP]), extend along El Camino Real from Peninsula Avenue to Ray Drive/Rosedale Avenue, in the City of Burlingame. Therefore, the analysis of this particular resource (the tree rows) is necessarily focused on its location in Burlingame. However, the Draft EIR/EIS analysis as a whole includes not just the Howard-Ralston Tree Rows, but also all environmental resources in the jurisdictions within the project limits. Therefore, no changes to the impact analysis are necessary.

Comment Steve Carlson-31

The DEIR/EIS Summary of Plan/Policy Consistency is not completely accurate. The document identifies that the proposed project would be consistent with only Policy 1.B.1, Goal 2 and Policy 2.B.1 of the San Mateo Pedestrian Master Plan (PMP). The DEIR/EIS identifies that compliance with Policy 1.B.1 will be achieved in part because it would make numerous improvements in Burlingame and Millbrae including adding hybrid beacons at streets within Burlingame, and ADA compliant sidewalks and ramps. The analysis does not identify the Pedestrian Master Plan specific requirements for a high-visibility cross walk (with an appropriate hybrid signal given the relatively long distance to signalized intersection of the Bellevue and Peninsula Avenues) at ECR/St. John's Court T-intersection a key SamTrans transit stop serving ECR transit corridor users of the low-income and communities of color lying to the east, nor how the project will improve the safety for pedestrians on the west side of ECR from Peninsula Avenue south to Engle Road (the intersections are not identified nor evaluated for pedestrian safety and no conceptual solutions are included (e.g. curb extensions, landscaped refuge islands, pavement markings such as advance stop bars). Numerous other pertinent PMP Goals, Objectives and Policies are not identified nor evaluate. Unless more information is included the project analysis is incomplete.

The DEIR/EIS identifies the proposed project would comply with the PMP Goal 2 Safety because it would make numerous improvements in Burlingame and Millbrae including adding hybrid beacons at streets within Burlingame, and ADA compliant sidewalks and ramps. The analysis does not identify the PMP specific requirements for a high-visibility cross walk (with an appropriate hybrid signal given the relatively long distance to signalized intersection of the Bellevue and Peninsula Avenues) at ECR/St. John's Court T-intersection a key SamTrans transit stop serving ECR transit corridor users of the low-income and communities of color lying to the east, nor how the project will improve the safety for pedestrians on the west side of ECR from Peninsula Avenue south to Engle Road (the intersections are not identified nor evaluated for pedestrian safety and no conceptual solutions are included (e.g. curb extensions, landscaped refuge islands, pavement markings such as advance stop bars). Numerous other pertinent PMP Goals, Objectives and Policies are not identified nor evaluate. Unless more information is included the project analysis is incomplete.

The DEIR/EIS identifies that it would possible somewhat comply with Policy 2.B.1 because refuge islands might be included in the design stage after FEIR certification, if warranted. Refuge islands and curb modification may be warranted on several intersections that are substantially wider than ECR and are designed in accordance with standards dating back to the 1890s or earlier. These need to be addressed in the DEIR/EIS so that the public and decision makers can make informed evidenced based decisions. Otherwise, it is not possible to evaluate compliance.

Response to Comment Steve Carlson-31

This comment is related to the discussion of the proposed project's consistency with local programs, plans, and policies in Section 3.1.1 of the Draft EIR/EIS, including the City of San Mateo Citywide Pedestrian Master Plan (2012). As discussed in Section 2.1.1, the project would include marking existing crosswalks with high-visibility paint (comprised of one layer of thermoplastic and two layers of glass beads) following project construction. In addition, the proposed project would replace pedestrian crossing signals, including APS and CPS throughout the project limits and install pedestrian hybrid beacons at select intersections including Bellevue Avenue. This project does not preclude future projects to improve pedestrian access in the corridor. Caltrans is willing to work closely with the community and the City of San Mateo to investigate, study, and address pedestrian access issues and opportunities along the corridor, develop solutions, and identify appropriate funding programs that could fund other projects that address community needs. Therefore, the proposed project would not conflict with a program, plan, ordinance or policy addressing the circulation system.

Comment Steve Carlson-32

It is inappropriate to suggest deferring evaluation of intersection safety and possible design solutions until after project FEIR certification with little or no public input or oversight. This approach neither meets the intent nor spirit of CEQA and NEPA to include relevant factual information and full public disclosure within the DEIR/EIS.

Response to Comment Steve Carlson-32

Caltrans is the owner-operator of the SHS, including the sections of El Camino Real designated SR 82. Caltrans is charged with designing and engineering intersections and roadways on the SHS to ensure public safety per adopted Caltrans and FHWA standards. Caltrans has not inappropriately deferred consideration of intersection safety or potential design solutions. The Draft EIR/EIS appropriately evaluates the proposed project features in relation to the potential environmental effects of the project. In his preceding comments related to intersection improvements, the commenter takes issue with minor, specific details related to the design of

intersection improvements included in the proposed project, such as the exact location and configuration of pavement markings, which will be determined at the design phase of the project. Where sufficient median widths are available, placement of refuge islands within the corridor will be built. These surface-level details are not anticipated to result in any additional environmental effects. The commenter provides no evidence that inappropriate deferral of any evaluation has actually occurred. It is not necessary for the Draft EIR/EIS to include detailed project engineering plans.

Comment Steve Carlson-33

The DEIR/EIS does not include relevant goals and policies contained in the San Mateo Bike Master Plan, nor the Sustainable Streets Plan. Without enumerating the relevant Goals, Objectives and Policies and evaluating the project's compliance, a reviewer cannot conclude whether the proposed project complies with the San Mateo Plans. The impact rating should be changed to Unknown. The DEIR/EIS should be revised to include the information and analysis and the DEIR/EIS recirculated for public comment.

Response to Comment Steve Carlson-33

Please see the responses to Comment Kat Wortham-6, Comment Kat Wortham-13, Comment Steve Carlson-14, and Comment Kat Wortham-13 for a discussion of bicycle use in the corridor and project consistency with the San Mateo County Bicycle Master Plan and City of San Mateo Bicycle Master Plan. In response to public comments, information about consistency with the City of San Mateo Sustainable Streets Plan has been added to Section 3.1.1 of this document. It is not necessary to revise and recirculate the Draft EIR/EIS because no new significant effects have been identified.

Comment Steve Carlson-34

Community Character and Cohesion

The DEIR/EIS identifies that the proposed project will affect community character and mitigation measures VIS-2 and CUL-3 are recommended. However, this analysis is largely based on and evaluation of tree removal in Burlingame. Little information is provided on the project requirement for tree removal and effect on community character in either San Mateo or Millbrae. San Mateo has large number (50 -100 representing 10% -15% of the corridor trees) of significant sized trees in the corridor – removal of which would likely alter the community character and potentially warranting adoption of Mitigation Measures. The DEIR/EIS provides scant information regarding trees except in a generalized manner. The DEIR/EIS does not include specific tree information (e.g. location, size, age, condition, species, disposition – to be removed or retained) and no diagrams, matrices or tables are included of this information. At the public DEIR meetings project proponents representatives indicated that that had this data, but did not include it along with other project related information. Without this information reviewers have no way of assessing the impacts.

The DEIR/EIS should be revised to incorporate and disclose this information and an analysis performed identifying trees to be potentially to be removed throughout the corridor and include more detailed tree information in San Mateo. The revised DEIR/EIS should be recirculated – until such time the DEIR/EIS analysis is incomplete and the project rating should be revised the Unknown.

While a sensitive subject, it is not appropriate to deferring the determination of all tree removal until after project FEIR certification. It is understood that additional tree removal may occur during construction despite efforts to protect trees not intended to be removed. The project proponents acknowledge that a large number of trees need to be removed, but have not disclosed which

trees. The project proponents are obligated to identify which tree are to be removed in the DEIR/EIS so that the impacts can be understood. The former approach neither meets the intent nor spirit of CEQA and NEPA to include relevant factual information and provide full public disclosure within the DEIR.

Response to Comment Steve Carlson-34

The VIA prepared for the project included an assessment of existing trees within the project limits in order to determine likely tree removals and study the environmental impacts. The title page of the Draft EIR/EIS included information regarding the availability of the VIA for public review. As discussed in Section 3.1.5, within the City of Burlingame, there is a relatively narrow roadway cross-section, which contrasts with a wider roadway cross-section in the cities of Millbrae and San Mateo. The wider sections have been altered over time to accommodate increased traffic. The narrow roadway width and large trees together create a sense of enclosure and intimacy within the project limits in the City of Burlingame that is absent in other portions of the project limits. Additionally, the San Mateo Sites Committee has designated the Howard-Ralston Eucalyptus Tree Rows within the City of Burlingame as a "Point of Historic Significance," but did not include the trees within San Mateo or Millbrae. Final determinations for tree removals are being developed with the input of an independent arborist and may be revised as conditions are discovered during construction. As described response to Comment Steve Carlson 11, the exact trees to be removed requires coordination among design engineers, landscape architects, and the SHPO, and such coordination cannot occur until the design phase. It is not possible to identify the specific trees to be removed until this additional surveys and coordination are completed during PS&E. Many factors need to be considered when determining which exact trees need to be removed. This includes exact location and dimensions of sidewalks, locations and potential relocation of utilities, location and dimensions of curb ramps, details of drainage work, etc. This level of information will not be available until PS&E when all factors are considered and laid out in the plans. It is not possible to identify the specific trees to be removed until this additional surveys and coordination are completed during PS&E. Sufficient information has been provided in the Draft EIR/EIS such that an appropriate impact conclusion can be reached and the public and agency decisionmakers can provide meaningful comment.

No further revision of the Draft EIR/EIS is required and recirculation of the Draft EIR/EIS is not necessary.

Comment Steve Carlson-35

Environmental Justice

The DEIR/EIS identifies that the proposed project would not affect Environmental Justice. This is not entirely accurate. Several residential neighborhoods adjacent to and along the ECR project corridor appear to be described as having a higher number of lower income households, higher number of immigrants and larger number of non-white households. Given the close proximity to ECR, these neighborhoods are more likely to experience the direct effects of the project construction over the duration of the 3 year project cycle. Including noise, fugitive dust, and both construction traffic and ECR traffic rerouted through their neighborhoods (ala internet apps despite the intentions of the project proponent to keep ECR open).

Additionally, little or no effort appears to have been extended to include representatives of these areas to help plan the project or to identify issues and concerns. In San Mateo the project does not appear to include features identified in the San Mateo Pedestrian Master Plan, San Mateo Bike Master Plan or the Sustainable Streets Plan to improve access from these neighborhoods to

transit stops on ECR (e.g. at ECR/St. John's Court pedestrian crossing with lighting and intersection control), and improve pedestrian safety. At this time, without a more thorough analysis the impact rating should be revised to Unknown.

The DEIR/EIS should be revised to include more information on how the project affects these communities, and the DEIR/EIS recirculated. Project proponents should consider making a special outreach to these communities to more clearly understand their concerns and how the impacts can be mitigated.

Response to Comment Steve Carlson-35

Environmental justice considerations are discussed in Section 3.1.3 of the Draft EIR/EIS. As described, the project would not disproportionately affect minority and low-income populations. As described in Section 2.1.1.3 of the Draft EIR/EIS, the project's construction contract will include the 2018 Caltrans Standard Specifications 7-1.02C, which requires contractors to certify they are aware of and will comply with all California Air Resources Board (ARB) emissions reduction regulations, and 14-9.02, which requires all work to be performed in accordance with air-pollution-control rules, regulations, ordinances, and statutes, including those provided in California Government Code § 11017 (Public Contract Code § 10231). Standard Specifications Section 10-5 includes specifications for dust control and dust palliatives to reduce airborne dust and its health impacts.

Also, please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives; response to Comment City of San Mateo-8 for a discussion of the proposed TMP to be implemented during project construction; response to Comment City of San Mateo-19 for a discussion of construction noise impacts and the proposed public outreach campaign; response to Comment Kristie Eglsaer-2 for a discussion of environmental justice; response to Comment Kristie Eglsaer-5 bicycle transit use within the project limits; and the responses to Comment Steve Carlson-31, and Steve Carlson-33 regarding consistency with applicable plans and policies. No further revision of the Draft EIR/EIS is required and recirculation of the Draft EIR/EIS is not necessary.

Comment Steve Carlson-36

Aesthetics

The DEIR/EIS identifies that the project would have No Impact on creating a new source of substantial light or glare which would adversely affect day or nighttime views in the area. The DEIR/EIS contains little or no information to existing or proposed lighting in the ECR corridor including location of light poles, type of lighting or level of ground level illumination. Additionally, the DEIR/EIS does not identify how it will comply with several San Mateo City policies that identify the need to provide higher levels of lighting to improve pedestrian safety and to provide pedestrian scale lighting (presumably in combination with highway lighting) along the San Mateo corridor. Burlingame proposes to underground facilities, meaning new light poles will be placed. But the proposed plan provides no information in this regard except a couple of sketch plans and corridor cross sections. Without more information regarding the existing and proposed levels of illumination, type of lighting and placement of lighting, reviewers cannot evaluate whether the project will not create some new sources of light that may affect views in the area. Mitigation may be warranted that all lights be directional and cast light on the pedestrian walkways and the ECR roadbed. The type of lighting (e.g. led vs incandescent) and height of poles (e.g. pedestrian scale lighting vs highway) will make a substantial difference in the location and number of light poles needed to achieve a level of illumination considered desirable for safety by project area residents and local officials. New or added crosswalks (e.g. ECR/St. Johns Court) and the other hybrid crosswalks in Burlingame will likely require additional lighting that may affect views.

Until this information can be included in the DEIR/EIS the rating should be revised to Unknown. The DEIR/EIS should be revised to include more information regarding existing and proposed light poles and ground illumination and the DEIR/EIS recirculated.

Response to Comment Steve Carlson-36

As described in the response to Comment City of San Mateo-6, while Caltrans is not required to comply with local regulations for its construction projects within state right-of-way, in the interest of comity and cooperation, Caltrans will work closely with all the jurisdictions within the project limits during the design phase to ensure that all existing lighting potentially affected by project construction would be replaced in kind at appropriate locations within the project limits. In addition, Caltrans will work with local jurisdictions to consider replacement lighting that complies with applicable plans and regulations.

No further revision of the Draft EIR/EIS is required and recirculation of the Draft EIR/EIS is not necessary.

Comment Steve Carlson-37

Air Quality

The DEIR/EIS identifies that the project will have a Less than Significant Impact to Air Quality. The DEIR/EIS identifies that construction impacts will be reduced by conformance with BAAQMD and Caltrans standards. However, the DEIR/EIS does not appear to take into account that a significant number of sensitive receptors line ECR and that in San Mateo a Senior Assisted Residential Care Facility and a small school front directly on ECR with a minimal setback of approximately 15 feet. Regarding the latter, fugitive dust can be a significant issue without constant watering during construction. The area experienced a sewer line installation on Highland Avenue that resulted in covering residences, landscaping, streets and personal vehicles with dust for days (construction watering was required). That said, excavation of a larger area with the prevailing winds can result in fugitive dust remaining in the micro atmosphere for hours. The Scholl caters to younger children, which like older residents are more susceptible to the adverse of micro fine dust. The DEIR/EIS needs to identify how the project will affect the operation of the Assisted Living Facility and the small private school and amended to discuss if compliance with BAAQMD and Caltrans standards eliminate impacts to sensitive receptors.

Until this information can be included in the DEIR/EIS the rating should be revised to Unknown. The DEIR/EIS should be revised to include more information regarding Air Quality associated with construction and the DEIR/EIS recirculated.

Response to Comment Steve Carlson-37

Please see response to Comment Steve Carlson-35 for a discussion of potential construction air quality impacts. No further revision of the Draft EIR/EIS is required and recirculation of the Draft EIR/EIS is not necessary.

Comment Steve Carlson-38

Biological Resources

The DEIR/EIS identifies that the project will have a Less than Significant Impact to and No Impact on the sub components comprising Biological Resources. The DEIR/EIS identifies that construction would not impact flora and fauna. The construction of the proposed project is identified to last as long 3 years and will requires activities that appears to will likely cause some ground disturbance. These type of sustained activities can cause local mass migration of local ground dwelling animals (e.g. rodents). In this regard, and the proximately to high number

residences along ECR, the DEIR/EIS should incorporate a discussion of this phenomena and how this can be addressed. A Vector Control Plan needs to be required as a Mitigation Measure so that this does not become an on-going issue during the long construction phase. Until this information can be included in the DEIR/EIS the rating should be revised to a level Less Than Significant with Mitigation Incorporated. The DEIR/EIS should be revised to include more information regarding tree and ground dwelling animals in the corridor likely to be affected by ground disturbance activities (e.g. rodents and squirrels, a Mitigation Measure added regarding Vector Control and the DEIR/EIS recirculated.

The DEIR/EIS acknowledges that the proposed project will have a less than significant impact regarding local policies protecting biological resources (i.e. the ECR trees). The DEIR/EIS while it acknowledges the Eucalyptus trees as non-native and invasive, retention of any of these trees seems to run counter to the California Governor's recent October 2020 Executive Order regarding Biodiversity if not other agencies efforts to remove non-native species. Other Federal and State Agencies have coordinated efforts to remove non-native plants (especially ones regarded as invasive). The DEIR/EIS need to be revised to include a discussion of this pertinent matter in so far it is pitting two contrary objectives. In simple order of precedence if State of California policy is to require that agencies such as Caltrans include removal of non-native invasive trees (e.g. as they have along US 101 near the SF Airport a decade or more ago) then the local policy needs to fall in line with the State's policy (all local authority is granted by the State). Federal policy needs to be reviewed regarding conflicts with Historic Cultural designations and policies to remove non-native invasive species. This is an apparent policy conflict between state and local and between federal agencies and needs to be resolved prior to the project completing the DEIR/EIS. It would be an unwise to establish that non-native species can receive protection form policies regulations to improve biodiversity and restore native habitats.

Once the policy matter is resolved, the DEIR/EIS should be revised and recirculated.

Response to Comment Steve Carlson-38

During the construction phase, ground disturbance would be limited to the existing roadway and landscaped/paved areas (sidewalks) adjacent to the roadway. The only areas potentially acting as habitat for "ground dwelling animals" are the non-paved planting strips along sidewalks. These areas primarily consist of mature trees, low landscaping, and bare dirt patches and offer limited areas for rodents. The loss of existing trees within the project limits would be balanced by the abundance of trees and shrubs within a 1-mile area surrounding the project limits. Squirrels would likely abandon the trees along El Camino Real for adjacent trees rather than seek refuge in residences.

In addition, Caltrans Standard Specifications include requirements for the treatment of trash and debris in construction areas. Compliance with these specifications will minimize potential shelter areas for rodents during construction.

Also, please see the response to Comment Katherine Moore-3 for a discussion of eucalyptus trees as invasive species. Resolution of potential policy conflicts between state, local, and federal agencies is outside of the purview of this project. No further revision of the Draft EIR/EIS is required and recirculation of the Draft EIR/EIS is not necessary.

Comment Steve Carlson-39

Cultural Resources

See above discussion regarding non-native trees.

Response to Comment Steve Carlson-39

Please see the response to Comment Katherine Moore-3 regarding the cultural resource policies governing the eucalyptus trees in the project area.

Comment Steve Carlson-40

Land Use and Planning

The DEIR/EIS identifies that the project will have No Impact to Land Use and Planning. The DEIR/EIS identifies that the proposed project is generally consistent with land use goals and policies. However, the proposed project is not consistent with San Mateo local plans as stated in previous sections. Moreover, should the ECR proposed project be constructed it would act to limit growth and development. Not incorporating multi-modal facilities, and fixing the number of lanes to 4 can be argued to limit the corridor's traffic capacity and limit the ability of nearby communities to develop additional housing (i.e. affordable housing) and commercial space. The lack of proposed improvements to facilitate or allow other modes of transportation along or to the corridor (e.g. pedestrian, bicycle micromobility connections) increasing the efficiency of the ECR corridor further acts to constrains it function as a regional north-sound corridor highway.

Transportation corridor capacities have long been known as a potential constraint to growth (e.g. witness the growth explosion of commercial and residential development in the Dublin-Pleasanton area during the late 1970s early 1980s once freeways were approved). No new freeways are going to be constructed and both SamTrans and Caltrains capacities are limited. Create use of remaining corridors, as envisioned by the GBI will help to mitigate some traffic congestion. The DEIR/EIS should be amended to include an analysis of the constraint that the proposed project will have on the growth and development on adjacent communities and compliance with the mandates to develop more housing. The rating should be revised accordingly and the amended DEIR/EIS recirculated.

Response to Comment Steve Carlson-40

As described in previous responses, Section 3.1.1 of the Draft EIR/EIS has been updated to include a discussion consistency with additional applicable plans but the conclusions regarding the project's consistency with applicable plans remain the same. The primary purposes of the proposed project are to rehabilitate the pavement, address drainage issues, and upgrade existing sidewalks. It would not be possible to achieve the project purpose and need, and to also add multimodal facilities within the existing four lanes of traffic, without substantially increasing vehicular delays and congestion. To the extent that the comment suggests widening the roadway to accommodate the addition of bicycle or transit lanes, this would not be allowed under SHOPP funding parameters, require substantial additional programming and funding, and the acquisition of new right-of-way which is not authorized by the SHOPP, as described in Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternative. A roadway widening would also result in decreasing or eliminating the area for planting replacement trees, and/or likely result in severe impacts to the private residences, businesses, and Section 4(f) properties along El Camino Real.

No further revision of the Draft EIR/EIS is required and recirculation of the Draft EIR/EIS is not necessary because, among other reasons, the commenter has not identified any proposal that would reduce the environmental effects of the project while meeting the purpose and need.

Comment Steve Carlson-41

Noise

The DEIR/EIS identifies that the project will have a Noise impact rated as Less than Significant Impact. The DEIR/EIS identifies that construction impacts will be reduced by conformance with Caltrans standards. However, the DEIR/EIS does not appear to take into account that a significant number of sensitive receptors line ECR and that in San Mateo a Senior Assisted Residential Care Facility and a small school front directly on ECR with a minimal setback of approximately 15 feet. Regarding the latter, the noise generated during construction in on the order of 86+ decibels. The stated and local regulations regarding interior classroom acoustic levels may not be achievable without substantial mitigation or modification to the project construction methods. The private school caters to younger children and has an outdoor playground. No information regarding the existing noise contours associated with the ECR corridor are provided though such information is required of each community to provide noise contours in the local General Plan. This information should be include in the DEIR/EIS to establish the base ambient noise levels.

The DEIR/EIS needs to identify how the project will affect the operation of the Assisted Living Facility and the small private school and amended to discuss appropriate Mitigation Measures to achieve and mandatory interior decibel levels. Specific Mitigation Measures should be included which require the contractor to equipment that is state of art in terms of low noise generation (e.g. use only rubber tire vehicles, use generators that have sound shielding, use electric equipment for small work such electric jack hammers).

Until this information can be included in the DEIR/EIS the rating should be revised to Unknown. The DEIR/EIS should be revised to include more information regarding Noise associated with construction and the DEIR/EIS recirculated.

Response to Comment Steve Carlson-41

Please see response to Comment City of San Mateo-19 for a discussion of construction noise impacts and the proposed public outreach campaign. No further revision of the Draft EIR/EIS is required and recirculation of the Draft EIR/EIS is not necessary.

Comment Steve Carlson-42

Transportation

The DEIR/EIS identifies that the project will have No Impact and Less than Significant Impact to Transportation subcategories. The DEIR/EIS identifies that the proposed project is not proposed to expand the number of travel lanes and is therefore consistent with local programs, plans ordinances and policies regarding the circulation system. This is not an accurate statement. The proposed project does not comply with the San Mateo transportation Goals, Objectives and Policies contained in the Pedestrian Master Plan the Bike Master Plan and the Sustainable Street Plan (as stated in greater detail in previous sections). The DEIR/EIS needs to be revised to include the San Mateo plans policies, the project revised to substantially comply with the local plans and the DEIR/EIS recirculated. Until this information can be included in the DEIR/EIS and the project revised, the rating should be revised to either Unknown or that it Does Not Comply.

Response to Comment Steve Carlson-42

This comment is related to the project's consistency with local programs, plans, and policies. Please see Section 3.1.1 of the Final EIR/EIS for information related to the project's consistency with applicable local plans and policies, including the City of San Mateo Citywide Pedestrian Master Plan (2012) and the City of San Mateo Sustainable Streets Plan (2015). To clarify, this project focuses on correcting roadway deficiencies and improving safety in the project corridor. The project would not change the existing circulation pattern.

This project does not preclude future projects to improve multimodal transportation in the corridor. Caltrans will work closely with the community and the local agencies during the design phase to investigate, study, and address pedestrian and bicycle access issues along the corridor, develop solutions, and identify appropriate funding programs that could fund other projects that address community needs. Therefore, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. No further revision of the Draft EIR/EIS is required and recirculation of the Draft EIR/EIS is not necessary.

Comment Steve Carlson-43

Local Plans and Policies

The DEIR/EIS identifies that the proposed project complies with local plans and policies. The DEIR/EIS enumerates only a few a couple of select goals and policies from San Mateo Bike and Pedestrian Master Plans. I have reviewed the San Mateo General Plan, Pedestrian Master Plan and the San Mateo Bike Master Plan and the Sustainable Streets Plan. These Plan documents contain many interrelated Goals, Objectives and Policies that pertinent to the ECR proposed project but are neither identified in the DEIR/EIS, nor does the DEIR/EIS evaluate the ECR proposed project's compliance with these policy documents. My assessment is that the proposed project does not appear to comply with many of the policies. The Impact rating should be changed to - does not comply.

The public outreach by the project proponents has been extensive over a long period to the Burlingame community (and to the exclusion of other project area residents directly affected by this project). Over the years, residents outside of Burlingame and transit, pedestrian and bicycle advocacy groups do not appear to have been invited to participate in the Task Force that has worked so closely with the project proponents (despite that approximately 1/3 of the project is situated in San Mateo and Millbrae) Similarly, communities with greater age were not included in the Task Force. No special outreach to these communities appears to have been conducted. Construction Impacts, lack of access to transit and lack of improvements to public safety are more likely to occur disproportionately to these areas.

While it is no wonder that the proposed plan primarily reflects the aspirations of Burlingame residents (due to the intentional or unintentional exclusions of others). While outside the scope of the purview of the project proponent, it is this type of exclusivity that has in part lead to the City of San Mateo forced examination of District elections in 2021.

While the few public notices of the proposed project scoping and DEIR/EIS meeting to project area residents included residents and officials of adjacent communities, few residents outside of Burlingame attended the Burlingame meetings because they were not aware of the project given the lack of outreach and the project materials focused on Burlingame, and that the meetings were only conducted in Burlingame. Furthermore, the information provided at these meetings was focused virtually exclusively on the benefits and impacts to Burlingame and no City representatives from San Mateo nor Millbrae were in attendance.

Whether intentional or not the proposed ECR appears to be as serving the expectations of Burlingame residents to the exclusion of the needs of adjacent community residents and the larger regional community. ECR is a regional highway serving the needs of a much larger community. Given the significant cost of the proposed project over \$100+ million dollars, the Task Force should be revisited and reformulated to be more inclusive. Many of the improvements envisioned in the proposed project are long overdue, but the current plan fails to meet the needs of the larger community and would have benefit of more ECR stakeholders. It would provide the most optimal and efficient manner to develop a plan and or alternative the meets the needs of area residents including Burlingame's.

Response to Comment Steve Carlson-43

Please see Chapter 5 for discussion of public outreach, the response to Comment City of San Mateo-8 for a discussion of the proposed TMP to be implemented during project construction; response to Comment Diane Condon-2 for further information on outreach conducted for the proposed project; response to Comment Steve Carlson-7, response to Comment Steve Carlson-31, and response to Comment Steve Carlson-33 regarding consistency with applicable plans and policies; and response to Comment Steve Carlson-30 for a discussion on the environmental analysis in the Draft EIR/EIS.

Comment Steve Carlson-44**Grand Boulevard Initiative (GBI)**

The DEIR/EIS identifies that the proposed plan only partially complies with the GBI goal of creating a multi-modal facility for pedestrians, bicyclists, other non-motorized and motorized personal equipment and vehicle motorists. The proposed plan either complies or it does not – and it does not. Given the narrow corridor width, the project proponents have identified a proposed plan that include trees at the expense of exclude other forms of transportation.

Considering that the DEIR/EIS concludes that the removal of all Eucalyptus trees will occur (including the few remaining original plantings) resulting in a Significant and Unavoidable Impact (requiring a Statement of Overriding Considerations to certify the EIR/EIS, the proposed plan is no more than a tree lined landscaped corridor. These fact lends itself to the notion that a Multi-modal Alternative is obvious, essential and warranted.

The DEIR/EIS Road Diet Alternative which was discarded because it does not appear to allow as many trees as the proposed project, is not terribly realistic and appears to have been developed without the input of transit, pedestrian and bicycle advocacy groups nor the larger area corridor residents of both San Mateo and Millbrae, nor residents (in San Mateo at least) most likely to utilize the transit in the corridor. Lower income neighborhoods and communities of color that line significant portions of the corridor and are likely to utilize alternative forms of travel do not appear to have been included in the Task Force working with Caltrans.

An Alternative should be constructed that places a priority of utilization of the corridor for multi-modal transportation and secondarily as a vegetated landscaped corridor. Landscaping can be included in a more judicious manner and perhaps hardscape and vertical sculptural forms included to enliven the corridor.

The DEIR/EIS rating should be revised to include a plan conforming Multi-modal Alternative and the text modified to identify that the proposed plan does not comply with the GBI nor City of San Mateo Plans.

Response to Comment Steve Carlson-44

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives and to response to Comment Katherine Moore-3. No further revision of the Draft EIR/EIS is necessary.

Comment Steve Carlson-45**San Mateo Plans**

The DEIR/EIS concludes that the proposed plan complies with a couple of City of San Mateo Pedestrian Master Plan and Bike Master Plan Goals, Objectives and Policies. However, were the DEIR/EIS authors to conduct a more careful and thorough examination of all of the pertinent Goals, Objectives and Policies, they would not reach the same conclusions.

In part this lack may be attributed to the lack of outreach to the residents of San Mateo and inclusion of an equal number of stakeholders on the Task Force including transit, pedestrian and bicycle advocacy groups and local area residents (especially from residential neighborhoods adjacent to the corridor). While outreach was extended to San Mateo officials and staff, it appears that City officials expressed little interest or concern.

This approach by City officials towards the San Mateo residential areas lying to the north and east of downtown and east of ECR, extends back years. And while the current officials have been working with some groups this in not extended to all areas and is in part what may have led to the City's recent resolution to consider conversion to district elections in 2021. Because of this shifting political dynamic, the project proponents may want to revisit the need for a more broad based Task Force (including neighborhood residents from San Mateo and Burlingame and multi-modal advocates) as a first step in completing the proposed project conceptual design and alternatives, before proceeding with preparation of the FEIR, project certification and design work.

Pedestrian Master Plan (PMP) pertinent policies that need to be identified and the proposed project evaluated for compliance include the following:

Goal 1 Mobility - Objective 1.A and subordinate Policies 1.A1.a, 1.A1.b., and 1.A1.c., Objective 1.B Policy 1.B1, Objective 1.C.1 and Policy 1C.1,

Goal 2 Safety - Objective 2.A Policy 2.A.3 and Objective 2.B Policy 2.B.1.

Goal 3 Infrastructure and Support Facilities - Objective 3.C,

Goal 4 Programs - Objective 4.A, Policy 4.A.1, Objective 4.B, Policy 4.B.1, Objective 4.D Policy 4.D.1,

Goal 5 - Objective 5.A, and Objective 5.B, Policies 5.B.1 and B.5.2.

The Pedestrian Master Plan (PMP) identifies numerous Goals, Objectives and Policies that are pertinent to the ECR proposed project. The PMP identifies pedestrian and bicycle travel as the highest priority. The PMP specifically identifies the need to provide increased pedestrian safety, comfort and convenience for local streets and ECR through sidewalk and crosswalk design, ADA compliant ramps, placement of refuge islands within the ECR corridor, increased lighting and provision of amenities. The PMP specifically identifies modifying ECR into a landscaped Greenway Pedestrian Corridor (part of a City-wide network) upgraded with pedestrian scale lighting, with high visibility crosswalk improvements and to include a mid-block crossing at ECR/St. John's Court T-intersection (with appropriate intersection control providing pedestrian safety). The need for pedestrian (and bicycle) safety within the corridor is identified in virtually all of the City Plan documents associated with traffic (e.g. Circulation Element, Bicycle Master Plan, Sustainable Streets).

The DEIR/EIS needs to be amended to include the above identified Goals, Objectives, and Policies, include an evaluation of how the proposed ECR project will achieve compliance with the PMP.

Response to Comment Steve Carlson-45

Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives, response to Comment City of San Mateo-2 for a discussion of the City of San Mateo Sustainable Streets Plan; response to Comment Kat Wortham-13 for a discussion of bicycle use in the corridor; and response to Comment Diane Condon-2 for further information on outreach conducted for the proposed project. No further analysis in the Draft EIR/EIS is necessary.

Comment Steve Carlson-46

Bicycle Master Plan

The Bicycle Master (BMP) pertinent Goals and Objectives that need to be identified and the proposed project evaluated for compliance include the following:

Goal 1 Connectivity, Goal 2 Safety and Comfort, Goal 3 Community, and Goal 4 Equity.

The BMP enumerates City Goals and Objectives and performance metrics to achieve a safe bicycle network accommodating local and regional needs. The BMP acknowledges ECR (and many other local bicycle designated streets (e.g. Delaware and Poplar Avenues) as a high stress facilities (owing to vehicle traffic). The BMP also identifies the need for improvements on ECR for crossing (ECR is perceived as a “traffic barrier” by many resident) as well as improvements for travel along the corridor connecting to other bicycle facilities and destinations. While not all of the Goal Objectives (not enumerated here because the BMP formatted the objectives without assignment of numbers or letters) of each Goal is pertinent to the ECR project at least one Objective for each Goal is pertinent. The BMP specifically identifies ECR as a bicycle and micro mobility corridor that warrants improvements and further attention. The EIR/EIS does not identify the BMP Goals and Objectives, nor evaluate the proposed ECR project’s compliance.

The DEIR/EIS should be amended to evaluate how the proposed project complies with the Bike Master Plan.

Response to Comment Steve Carlson-46

Please see the responses to Comment Kat Wortham-6, Comment Kat Wortham-13, and Comment Steve Carlson-14 for a discussion of bicycle use in the corridor and project consistency with the City of San Mateo Bicycle Master Plan and the San Mateo County Bicycle Master Plan. No further revision of the Draft EIR/EIS is necessary.

Comment Steve Carlson-47

Sustainable Streets Plan (SSP)

The Sustainable Streets Plan (SSP) identifies numerous Goals, Objectives and Policies that are pertinent to the ECR proposed project as follows:

Goal 1 Safety and Vision Zero - Objective 1.A, Policy 1.A.2,

Goal 2 Mobility - Objective 2A, Policy 2.A.1, Objective 2.B. Policy 2.B.1, Policy 2.B.3, Policy 2.B.4, Objective 2.C, Policy 2.C.1,

Goal 3 Infrastructure and Support Facilities - Objective 3.A, Policy 3.A.1, Policy 3.A.2, Policy 3.A.3, Objective 3.B.s, and Policy 3.B.3, Objective 3.D, Policy 3.D.3, Policy 3.D.4 and Policy 3.D.7,

Goal 4 Programs - Object 4.B, Policy 4.B.1, Objective 4.C, Policy 4.C.1, Policy 4.D, Policy 4.D.1,

Goal 5 Equity - Objective 5.A, Objective 5B, Policy 5.B.1, Policy 5.B.2.

The SSP identifies incorporating complete streets and green streets principles and concepts into all streets (including ECR). The plan identifies human life and health are paramount in street design and use. The SSPP identifies ECR as a Greenway Corridor and as a pedestrian and bicycle travel as the highest priority. The SSP specifically identifies the need to provide increased pedestrian safety, comfort and convenience for local streets and ECR through sidewalk and crosswalk design, ADA compliant ramps, placement of refuge islands within the ECR corridor, increased lighting and provision of amenities. The SSP specifically identifies modifying ECR into

a landscaped Greenway Pedestrian Corridor (part of a City-wide network) upgraded with pedestrian scale lighting, with high visibility crosswalk improvements.

The DEIR/ES does not identify the SSP nor evaluate the ECR propose project's compliance. The EIR/EIS needs to be amended to identify and evaluate how the proposed ECR project will comply with these pertinent Goals, Objectives and Policies.

Response to Comment Steve Carlson-47

Please see the response to Comment City of San Mateo-2 for a discussion of the City of San Mateo Sustainable Streets Plan; and the responses to Comment Steve Carlson-7, Comment Steve Carlson-31, and Comment Steve Carlson-33 regarding consistency with applicable plans and policies. No further revision of the Draft EIR/EIS is necessary.

5.4.2.30 Manito V

Comment Manito V-1

The Draft EIR/EIS states that there's no designated bicycle facilities within the project limits. This is not true.

1. There is a multi-use ped/bike asphalt path on the east side of El Camino Real from roughly Adeline northerly towards Rosedale and continues to Dufferin. That is actively used by neighbors and Burlingame school children and families. The path is in serious disrepair and should be upgraded to a Class I path that meets Caltrans Highway Design Manual standards as part of the ECR renewal project. Burlingame has said that it does not have the ability to keep maintaining a path that has clearly reached the end of its usable life. It needs to be rebuilt with this capital project so that it can be reasonably maintained by either the state or the City in the future. In any case, pedestrians and bicyclists within the City of Burlingame clearly benefit from this path. It also has regional benefits as it does connect with the larger north-south bikeway in the Peninsula. Please confirm addition of this important safety and circulation element.

Here's a video prepared by local Burlingame kids and families for reference.

Response to Comment Manito V-1

The Draft EIR/EIS accurately states that the sidewalk facility (which the commenter refers to as a "multi-use ped/bike asphalt path") is not a designated bicycle path; it is what is often termed as a "social trail." This comment refers to an existing sidewalk facility adjacent to northbound SR-82/El Camino Real in the City of Burlingame, which extends from roughly Adeline Drive to Dufferin Avenue. This facility would be upgraded as part of the Build Alternative, as described in Section 2.1.1 of the Draft EIR/EIS. All existing sidewalks within the project limits from East Santa Inez Avenue (PM 12.3) in the City of San Mateo to Dufferin Avenue (PM 14.3) in the City of Burlingame would be upgraded as part of the project. The upgraded sidewalks would range from five feet to six feet in width and would be compliant with ADA standards. In response to comments received during review of the Draft EIR/EIS, consideration will also be given to upgrading the existing pathway between Adeline Drive and Dufferin Avenue to bicycle facilities standards during the design phase.

Comment Manito V-2

2. North of Dufferin by the hospital, there are wide shoulders on both sides of ECR all the way to Millbrae Ave. While not a designated bike route per se, the shoulders are used by cyclists with Caltrain/BART and the shopping plaza areas and the Mills Hospital as their destinations. These should be upgraded to full Class I bike lanes with buffer or other protection as part of the project.

These are not mentioned explicitly in the Burlingame Bicycle, Pedestrian Master Plan because it was deferring to the ECR project to make that designation and the needed upgrade to Class II BLs. It's not fair to reference back to the BPMP when it was inferred that that work should be mentioned and done as part of the ECR project. There is no other project that can make this happen.

While it may be true that bike facilities are either challenging or not feasible to implement on ECR (I will not debate that), this ECR section where the right of way is widest has the potential for multimodal complete streets improvements. I hope this project incorporates it. It fits in with the State's stated multimodal goals ie triple bicycle trips and double pedestrian trips.

Response to Comment Manito V-2

The Draft EIR/EIS evaluated the project in terms of its conformity with various plans, including the Burlingame Bicycle, Pedestrian Master Plan. The statement that Caltrans has been tasked with designating a Class 1 bicycle path along El Camino Real is incorrect. Please see response to the response to Comment City of Burlingame-7 for a discussion of potential improvements to bicycle facilities in the project limits.

5.4.2.31 Manito V 2

Comment Manito V 2-1

Thank you for putting together the EIS/EIR draft.

I write to express concerns about the proposed HAWKs on ECR. Thank you for prioritizing pedestrian safety by proposing improvements here as they are needed:

- ECR/Palm (New Life Community Church)
- ECR/Willow (Church of All Russian Saints, and MCKinley school)
- ECR/Bellevue (St Paul's Episcopal)

However, I ask that the project please consider making these actuated 3-color signals instead. From local experience observing the closest HAWKs in this neighborhood – the 4-5 in Millbrae and the one in San Mateo, those have been in for 2-3 years now and yet drivers and pedestrians are still confused on how they work. There is frequent honking and red light running at those intersections.

Each of these crossings are adjacent to a church/worship building so draw their share of senior citizens and their families. These folks would be more fully protected with a 3-color signal rather than relying on drivers to yield to them after the HAWKs have gone to red flash.

One of the most collision-prone intersections in this section of ECR is on Floribunda, which is a 3-color signal already. A lesser form of control in the way of just flashing beacons does not bode well for how drivers and peds will react. ECR/Bellevue in particular is only one block south of Floribunda. It is around a slight horizontal curve, so stop and go HAWK traffic there may be problematic.

Actuated 3-color signals are probably best at these locations. They're not frequently used crossings so will most of the time sit on green for ECR. Only going red during church services, school hours or rare ped xings.

Response to Comment Manito V 2-1

As described in response to Comment Burlingame Friends of the Trees-4, pedestrian hybrid beacons are the standard crossing enhancements proposed for El Camino Real. Pedestrian hybrid beacons have been shown to significantly reduce pedestrian crashes. An FHWA study published

in 2010 found that pedestrian hybrid beacons can reduce pedestrian crashes by 69 percent and total crashes by 29 percent (FHWA 2010). Because pedestrian hybrid beacons remain dark until activated, they can help increase driver attention to pedestrians crossing the roadway and can reduce rear-end collisions.

5.4.2.32 Rosemarie Pero

Comment Rosemarie Pero-1

Many of us are hoping these trees that line ECR will be removed so that our sidewalks won't be a trip hazard ?

Response to Comment Rosemarie Pero-1

Thank you for your comment. Damage to sidewalks due to tree roots is acknowledged in Section 1.3.2.3 and sidewalk improvements are described in Section 2.1.1 of the Draft EIR/EIS.

5.4.2.33 Comment Joyce Courtney Email

Comment Joyce Courtney Email-1

I am a resident homeowner living in a condominium on the corner of El Camino and Willow Avenue in Burlingame, CA. Specifically, the entirety of my personal condominium unit runs along the El Camino side of our building, so my windows and patios face right onto El Camino, under the shade and protection of the historic Eucalyptus trees that run along the inside of our property on the west side of El Camino. These trees provide countless benefits that immensely affect my quality of life, including but not limited to shade, privacy screening, noise and pollution buffer, and wildlife and avian habitat.

Thank you for the opportunity to submit comments regarding the EIR draft. While I was pleased to see that many of my comments that I submitted in July 2020 and January 2021 were addressed in the draft, I would like to add some additional comments and pose still unanswered questions.

Response to Comment Joyce Courtney Email-1

This comment contains introductory statements relating to Joyce Courtney's comments on the Draft EIR/EIS, which are addressed in the responses below.

Comment Joyce Courtney Email-2

PDF page 10/207 (Summary page "iii"): Utilities/Emergency Services

- The Build Alternative may require short-term, temporary interruptions of electrical service.

Comment/Question: I'm a permanent remote worker, and any outages will directly impact my ability to perform my job. Additionally, my building has an elevator, which supports elderly residents on upper floors. Extended outages would impact residents who rely upon the elevator due to limited mobility.

a) How do you plan to notify affected residents in advance of planned outages?

b) How long do you expect outages to last?

c) Will required outages be 'clean' and not partial outages or surge type outages? These types of outages cause our elevator's automatic restarting device to fail, costing our tiny association a

substantial expense as restoring elevator functionality after such an outage requires manual intervention by an onsite technician.

Response to Comment Joyce Courtney Email-2

Prior to the start of construction, a public outreach campaign will be developed that will include the designation of a Public Information Officer (PIO) who will act as a single point of contact to inform local jurisdictions and the public on all issues related to implementation of the project, including the construction schedule, traffic control, temporary changes in traffic circulation, utility relocation and temporary outages, and construction staging. The PIO will be available to address any project complaints during construction.

The need for utility outages at this stage of project development has not yet been determined. Caltrans will work with PG&E to minimize disruption of service. Any claims for impacts related to the disruption of electrical service would be determined by PG&E.

Comment Joyce Courtney Email-3

PDF page 11/207 (Summary page “iv”): Visual/ Aesthetics

- Trees and vegetation outside of clearing and grubbing limits shall be protected from construction operations, equipment, and materials storage.

Question: What does Clearing and Grubbing Limit refer to?

Response to Comment Joyce Courtney Email-3

The clearing and grubbing limit is the area in which vegetation and debris are deemed necessary for removal as part of the project. This includes the potential removal of trees and other vegetation.

Comment Joyce Courtney Email-4

PDF page 13/207 (Summary page “vi”): Construction Impacts (Noise)

- The Build Alternative would require daytime and nighttime construction activities adjacent to residences and a school. These activities are anticipated to be louder than allowable noise limits.

NOI-1. A temporary noise barrier or other control measure will be put in place in front of McKinley Elementary to attenuate noise to less than 52 dBA whenever work is planned within 500 feet of the school during regular school hours. Noise levels will be verified through noise monitoring during construction. NOI-2. The project plans will include a specification for the contractor to create and implement a Noise Control and Monitoring Plan.

Comment/Question: That’s nice for McKinley Elementary, but what about residents such as myself, who live directly on El Camino? My condominium unit is on the first floor, and I already suffer daily from traffic and leaf blowers. I work from home and would like to enjoy as much of a peaceful, stress-free life. What measures will you be taking to mitigate the noise a resident like myself will have to endure? It’s terribly disturbing to read that the Build Alternative will require daytime and nighttime construction activities. Put yourself into my shoes – how would you feel having construction noise 24/7, when you have to hold down a job, and cannot escape the noise during the day, but also cannot escape the noise at night??

Response to Comment Joyce Courtney Email-4

Please see response to Comment City of San Mateo-19 for a discussion of construction noise impacts and the proposed public outreach campaign.

Comment Joyce Courtney Email-5

PDF page 29/207 (page "2-2"): Figure 2-1.1-1: Build Alternative

AND

PDF page 31/207 (page "2-4"): Figure 2.1.1-2: Design Option to Underground Utilities

- Under the Build Alternative and Build Alternative with Design Option, the roadway would maintain its existing 44- to 46-foot width including two 10- to 11-foot-wide travel lanes in each direction. All permanent improvements would occur within existing state and city/town right-of-way.

Comment/Question: Please confirm what is the existing state and city/town right-of-way? I cannot find this information anywhere within San Mateo County Assessor maps. Basically, the maps do not show how much of each property along El Camino is private versus city/town right-of-way? Are we talking 2ft, 3ft, 6ft, 10ft? If you are upgrading sidewalks to 5-6ft, where are you going to capture the extra required space? If you don't decrease the width of the roadway, the only other place would be to take it out of the adjoining properties. We have irrigation systems, trees and vegetation running thru the property inside the sidewalk; how much of this do we stand to lose in order for the city to expand the width of the existing sidewalk and add any possible planter strip? This could bring the public 9ft into our property and right up under all of my patios and windows, which would be absolutely horrible! How will you mitigate the loss of my personal safety, privacy and noise? I can't just pick up and move away, this is my home and my lifelong investment. This invasion and loss of privacy and personal safety will be detrimental to my quality of life. You will already be destroying the Eucalyptus trees and adjoining trees on our property (my privacy screen) to expand the sidewalk and install a planter strip.

Comment: I am okay with Underground Utilities, as long as you are committed to maximize the number and size of new replacement trees. I am not in favor of replanting small trees that provide no shade, no sound, no pollution nor privacy buffer, nor provide any suitable habitat or food supply for birds.

Response to Comment Joyce Courtney Email-5

As described in the Draft EIR/EIS, the project would be constructed within Caltrans' right-of-way. While temporary construction easements may be necessary, no permanent acquisition of new right-of-way is anticipated nor is it anticipated that trees on private property would be affected. During the design phase, Caltrans' right-of-way will be re-established. This may involve areas where improvements done by others may have occurred within Caltrans' right-of-way. During the design phase, Caltrans will work closely with property owners to minimize construction related impacts. Areas within Caltrans' right-of-way not proposed for sidewalks or driveways will be considered for planting, within the constraints of utility infrastructure, the clear recovery zone, and sight distance requirements of the Highway Design Manual.

Comment Joyce Courtney Email-6

PDF 32/207 ("2-5"): Design Option to Underground Utilities

- Utility undergrounding efforts are being funded, lead, and coordinated by the City of Burlingame. On June 17, 2019, the Burlingame City Council established the EI

Camino Real Underground Utility District to initiate proceedings for implementing the proposed utility undergrounding. The City of Burlingame estimates this work will cost \$25-30 million if done as part of the Build Alternative (Goldman 2020). The City of Burlingame will coordinate with Caltrans Design on the placement of utility infrastructure to avoid impacts to the environment. Final approval of utility undergrounding would depend upon agreements between the City of Burlingame, Caltrans, PG&E, and other utility providers. This design option would be constructed as long as necessary funding and approvals are secured by the City of Burlingame.

Question: What would stop Burlingame from security this funding?

Response to Comment Joyce Courtney Email-6

As described in the Draft EIR/EIS, the undergrounding of utilities along El Camino Real within the project limits are being funded, lead, and coordinated by the City of Burlingame. Questions regarding this funding should be directed to the City of Burlingame Department of Public Works.

Comment Joyce Courtney Email-7

Page 123/207 (page 3-80): Migratory Birds

- Construction activities (including vegetation removal) will be conducted between September 30 and January 31 or a qualified biologist will conduct a nesting migratory bird survey within 72 hours prior to construction.
- If active nests of migratory birds are detected within 50 feet of construction activities for passerines or within 300 feet of construction activities for raptors, the biological monitor will establish an appropriate non-disturbance buffer to avoid direct effects of construction-related disturbance until work has been completed or birds have fledged.

Comment/Question: Regarding the BMPs outlined in this section will occur? As nice as it sounds to read that a biologist will conduct a nesting bird survey, realistically, how thorough will this search be? Our property (which adjoins El Camino) is unique along the corridor, in which there is a large setback area, very full of dense shrubs and trees. Will a biologist actually walk through all the private properties and habitats within the stated distances? In our property along El Camino, within 50ft distance of the project area, there are multiple passerine nests, with multiple broods per breeding season. I do daily bird counts and track nesting, and I know how difficult it is to locate the nests, even though I have a lot of expertise as a birder, and intimately know the plants in my property. I'm just not clear how the biologist will find all the nests. If I know the nests are in my property, how can I confirm that the biologist will be similarly aware, and take the stated actions addressed in the BMPs?

Response to Comment Joyce Courtney Email-7

If trees are to be removed during the nesting bird season, then multiple qualified biologists will perform nesting bird surveys and may walk as far as the Caltrans right-of-way line. Biologists will use binoculars during all bird surveys. The PDT is discussing methods of tree removal that will make this process easier. Discussions have included the possibility of limbing and/or removing trees between September 30 and January 31, outside of the bird nesting season to limit the potential for birds to nest within the project footprint. Also, please see response to Comment Adrienne Leigh-1 for a discussion of compliance with the MBTA.

5.4.2.34 jimdotlaw**Comment jimdotlaw-1**

As a townhome owner living right on ECR in Burlingame, I feel we need the underground utility option so we can have replacement trees on both sides along with smooth sidewalks on both sides of ECR. Need a good fix that underground utilities provide. The state has a \$75 Billion surplus do the extra cost of underground utilities and relocating some of the existing eucalyptus trees should not be an issue.

Response to Comment jimdotlaw-1

Thank you for your comment. As described in the Draft EIR/EIS, the undergrounding of utilities along El Camino Real within the project limits are being funded, led, and coordinated by the City of Burlingame. Questions regarding this funding should be directed to the City of Burlingame Department of Public Works.

5.4.2.35 Joe Baylock**Comment Joe Baylock-1**

This project is over-designed and over-engineered for what Burlingame and the mid-Peninsula need. Both the underground and no underground alternatives are too destructive to the eucalyptus groves and the general health and safety of people who travel on and live near El Camino Real. I only want and need three things from this project. 1) Fix the drainage at the known flooding locations--there are four to six of those in Burlingame. They are well known to everyone and need immediate attention.

Response to Comment Joe Baylock-1

Thank you for your comment. Please refer to Section 2.1.1 for a description of drainage improvements included in the proposed project.

Comment Joe Baylock-2

2) Build "Pedestrian bridges" over the worst sidewalk locations disrupted by tree roots as described on the virtual meeting of 7/14.

Response to Comment Joe Baylock-2

Thank you for your comment. The construction of "pedestrian bridges" along the corridor would not meet the project purpose to "Enhance pedestrian infrastructure and bring it into compliance with Title II of the Americans with Disabilities Act (ADA)." In addition, "pedestrian bridges" would not be feasible in many locations due to the requirement to conform with driveways along El Camino Real.

Comment Joe Baylock-3

3) Repave the road as was partially done in October 2019 as shown here: <https://www.burlingamevoice.com/2019/10/caltrans-to-the-rescue-on-ecr.html#comments>. Anything above these three items is overkill and threatens the eucalyptus that are an existing and effective safety mechanism. During the virtual meeting, the sun screening advantages to southbound drivers was noted and needs to be retained. The eucalyptus also provide outstanding pedestrian safety as vehicle speeds can reach 50 mph and have been known to careen onto sidewalks. Please go back to the drawing board and come up with a "light build" alternative that limits the work to these three issues.

Response to Comment Joe Baylock-3

The existing deteriorated quality of the roadbed, sidewalks, and drainage system within the project limits is described in Section 1.3.1 of the Draft EIR/EIS. The Draft EIR/EIS as well as previous information that Caltrans has shared during public outreach and scoping explain why temporary repairs listed in the linked article would not address these long-term issues with the roadway and would be inadequate.

5.4.2.36 Maria Moya

Comment Maria Moya-1

I agree with many who believe that that this project is over-designed and over-engineered for what Burlingame and the mid-Peninsula need. Both the "underground" and "no underground" alternatives are too destructive to the eucalyptus groves and the general health and safety of people who travel on and live near El Camino Real.

I believe we only need three things from this project:

1) Fix the drainage at the known flooding locations--there are four to six of those in Burlingame. They are well known to everyone and need immediate attention.

Response to Comment Maria Moya-1

As described in Chapter 5 of the Draft EIR/EIS, Caltrans provided opportunity for the public to comment on the project need and purpose. The Draft EIR/EIS discloses how Caltrans is balancing the need and purpose of the project with the need to avoid, minimize, and mitigate environmental impacts. Also, please refer to the response to Comment Joe Baylock-1.

Comment Maria Moya-2

2) Build "Pedestrian bridges" over the worst sidewalk locations disrupted by tree roots as described on the virtual meeting of 7/14.

Response to Comment Maria Moya-2

Thank you for your comment. Please refer to the response to Comment Joe Baylock-2.

Comment Maria Moya-3

3) Repave the road as was partially done in October 2019 as shown here:
<https://www.burlingamevoice.com/2019/10/caltrans-to-the-rescue-on-ecr.html#comments>.

Doing more than above is overkill and threatens the eucalyptus that are an existing and effective safety mechanism.

During the virtual meeting, the sun screening advantages to southbound drivers was noted and thus should be retained. The eucalyptus also provide effective pedestrian safety as otherwise vehicle speeds can reach 50 mph and have been known to careen onto sidewalks. Please go back to the drawing board and come up with a "light build" alternative that limits the work to these three issues.

Thank you.

Response to Comment Maria Moya-3

Please refer to the response to Comment Joe Baylock-3.

5.4.2.37 Ramona Raybin**Comment Ramona Raybin-1**

Thank you for providing the ECR Renewal Project for citizen review and comment. It is an exhausting, thorough document. I have a much clearer idea of what, I believe, of all the options considered and, in the end, what needs to be done.

As for the choices provided, we support the ""Build with Design Options"" for all three sections of the renewal. The additional trees will make a pleasing difference over time and hopefully will not reach sizes that will require them to be removed in the future. Thank you and we hope you will be permitted to move forward with the renewal soon.

Response to Comment Ramona Raybin-1

The commenter's support for the design option is noted.

5.4.2.38 Thomas Richards**Comment Thomas Richards-1**

Quote:

""Given how long it took to take out just one eucalyptus at Howard Ave. a couple years ago (about a week), we could be faced with a year or more of horrific traffic closures as there are 390 of them in the tree rows. The claim is that only 3% of them are in "good condition"". And yet they go on year after year with minimal incidents. It seems like selective replacement as we have been doing is better than a wholesale removal and replacement with 7 to 14' trees.

Response to Comment Thomas Richards-1

Thank you for your comment. Removal of existing trees will indeed be a critical piece of the construction staging for this project. Unfortunately, many trees' advanced age and compromised health and structure make it impossible for them to survive the impacts of construction and excavation associated with reconstructing the sidewalks and roadways. This construction work additionally has the potential to damage structural roots and affect the stability of many existing trees. Therefore, Caltrans and independent arborists have concluded that the removal and replacement of approximately 300-350 trees will be required.

Comment Thomas Richards-2

""As for the rough sidewalks pushed up by tree roots, one of the Caltrans personnel finally said what I have been thinking for years-- why not just "bridge over slightly raised roots". It is apparently allowed and would work in the places that are not too bad. Throw in some serious digging at the 4 or 5 known flooding areas to clear roots and debris and rebuild the drains and you have what I would call a "Light Build alternative"". ""

-The Burlingame Voice, July 28, 2021"

Response to Comment Thomas Richards-2

Please refer to the response to Comment Joe Baylock-3.

5.4.2.39 Brett Poffenbarger

Comment Brett Poffenbarger-1

Please protect all of the historic Eucalyptus trees and narrow El Camino Real to three lanes of traffic to improve the road and sidewalks.

Response to Comment Brett Poffenbarger-1

Thank you for your comment. Please see Master Response 1 regarding the historic tree row and Section 2.1.5 regarding alternatives considered, including the explanation why a road diet would not preserve any substantial number of trees. Narrowing El Camino Real to three lanes of traffic similarly would not preserve a substantial number of trees, because this would require bus pull outs, and attendant tree impacts, to allow SamTrans buses to clear the travel lane.

5.4.2.40 Gordon Foster

Comment Gordon Foster-1

“A couple of suggestions:

At the last virtual meeting two or three simulations were shown depicting how certain blocks would look 20 years after the project. Would it be possible to create more such simulations, especially for the blocks most heavily impacted by tree removal?

In view of the huge visual impact of wholesale tree removal on many blocks, it would be desirable to spread out tree removal over much longer than anticipated in the proposed alternatives. Otherwise it doesn't make sense to continue treating this section of El Camino Real as a historical landmark.

And of course, please save as many mature trees as possible!”

Response to Comment Gordon Foster-1

The simulations provided in the Draft EIR/EIS are sufficient to portray the expected environmental impacts in the project area, and additional simulations would require further coordination on tree removal as described in Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows.

As described in Section 2.1.4.3 of the Draft EIR/EIS, an alternative to extend the construction phase was considered but rejected because it would add considerable time and inconvenience to residents, businesses, and commuters via traffic disruptions through the project limits during a longer construction period while having only a minor effect on reducing potential effects to the environment.

5.4.2.41 Comment Joyce Courtney Website

Comment Joyce Courtney Website-1

I am a resident homeowner living in a condominium on the corner of El Camino and Willow Avenue in Burlingame, CA. Specifically, the entirety of my personal condominium unit runs along the El Camino side of our building, so my windows and patios face right onto El Camino, under the shade and protection of the historic Eucalyptus trees that run along the inside of our property on the west side of El Camino. These trees provide countless benefits that immensely affect my quality of life, including but not limited to shade, privacy screening, noise and pollution buffer, and wildlife and avian habitat.

Thank you for the opportunity to submit comments regarding the EIR draft. While I was pleased to see that many of my comments that I submitted in July 2020 and January 2021 were addressed in the draft, I would like to add some additional comments and pose still unanswered questions.

Response to Comment Joyce Courtney Website-1

This comment contains introductory statements relating to Joyce Courtney’s comments on the Draft EIR/EIS, which are addressed in the responses below. No response is required.

Comment Joyce Courtney Website-2

PDF page 10/207 (Summary page “iii”): Utilities/Emergency Services

- The Build Alternative may require short-term, temporary interruptions of electrical service. I’m a permanent remote worker, and any outages will directly impact my ability to perform my job. Additionally, my building has an elevator, which supports elderly residents on upper floors. Extended outages would impact residents who rely upon the elevator due to limited mobility.

a) How do you plan to notify affected residents in advance of planned outages?

b) How long do you expect outages to last?

c) Will required outages be ‘clean’ and not partial outages or surge type outages? These types of outages cause our elevator’s automatic restarting device to fail, costing our tiny association a substantial expense as restoring elevator functionality after such an outage requires manual intervention by an onsite technician.

Response to Comment Joyce Courtney Website-2

This is a duplicate comment. Please see response to Comment Joyce Courtney Email-2.

Comment Joyce Courtney Website-3

PDF page 11/207 (Summary page “iv”): Visual/ Aesthetics

- Trees and vegetation outside of clearing and grubbing limits shall be protected from construction operations, equipment, and materials storage.

Question: What does Clearing and Grubbing Limit refer to?

Response to Comment Joyce Courtney Website-3

This is a duplicate comment. Please see response to Comment Joyce Courtney Email-3.

Comment Joyce Courtney Website-4

PDF page 13/207 (Summary page “vi”): Construction Impacts (Noise)

- The Build Alternative would require daytime and nighttime construction activities adjacent to residences and a school. These activities are anticipated to be louder than allowable noise limits.

NOI-1. A temporary noise barrier or other control measure will be put in place in front of McKinley Elementary to attenuate noise to less than 52 dBA whenever work is planned within 500 feet of the school during regular school hours. Noise levels will be verified through noise monitoring during construction. NOI-2. The project plans will include a specification for the contractor to create and implement a Noise Control and Monitoring Plan.

That's nice for McKinley Elementary, but what about residents such as myself, who live directly on El Camino? My condominium unit is on the first floor, and I already suffer daily from traffic and leaf blowers. I work from home and would like to enjoy as much of a peaceful, stress-free life. What measures will you be taking to mitigate the noise a resident like myself will have to endure? It's terribly disturbing to read that the Build Alternative will require daytime and nighttime construction activities. Put yourself into my shoes – how would you feel having construction noise 24/7, when you have to hold down a job, and cannot escape the noise during the day, but also cannot escape the noise at night??

Response to Comment Joyce Courtney Website-4

Please see response to Comment City of San Mateo-19 for a discussion of construction noise impacts and the proposed public outreach campaign.

Comment Joyce Courtney Website-5

PDF page 29/207 (page "2-2"): Figure 2-1.1-1: Build Alternative

AND

PDF page 31/207 (page "2-4"): Figure 2.1.1-2: Design Option to Underground Utilities

- Under the Build Alternative and Build Alternative with Design Option, the roadway would maintain its existing 44- to 46-foot width including two 10- to 11-foot-wide travel lanes in each direction. All permanent improvements would occur within existing state and city/town right-of-way.

Please confirm what is the existing state and city/town right-of-way? I cannot find this information anywhere within San Mateo County Assessor maps. Basically, the maps do not show how much of each property along El Camino is private versus city/town right-of-way? Are we talking 2ft, 3ft, 6ft, 10ft? If you are upgrading sidewalks to 5-6ft, where are you going to capture the extra required space? If you don't decrease the width of the roadway, the only other place would be to take it out of the adjoining properties. We have irrigation systems, trees and vegetation running thru the property inside the sidewalk; how much of this do we stand to lose in order for the city to expand the width of the existing sidewalk and add any possible planter strip? This could bring the public 9ft into our property and right up under all of my patios and windows, which would be absolutely horrible! How will you mitigate the loss of my personal safety, privacy and noise? I can't just pick up and move away, this is my home and my lifelong investment. This invasion and loss of privacy and personal safety will be detrimental to my quality of life. You will already be destroying the Eucalyptus trees and adjoining trees on our property (my privacy screen) to expand the sidewalk and install a planter strip.

I am okay with Underground Utilities, as long as you are committed to maximize the number and size of new replacement trees. I am not in favor of replanting small trees that provide no shade, no sound, no pollution nor privacy buffer, nor provide any suitable habitat or food supply for birds.

Response to Comment Joyce Courtney Website-5

This is a duplicate comment. Please see response to Comment Joyce Courtney Email-5.

Comment Joyce Courtney Website-6

PDF 32/207 ("2-5"): Design Option to Underground Utilities

- Utility undergrounding efforts are being funded, lead, and coordinated by the City of Burlingame. On June 17, 2019, the Burlingame City Council established the El Camino Real Underground Utility District to initiate proceedings for implementing the

proposed utility undergrounding. The City of Burlingame estimates this work will cost \$25-30 million if done as part of the Build Alternative (Goldman 2020). The City of Burlingame will coordinate with Caltrans Design on the placement of utility infrastructure to avoid impacts to the environment. Final approval of utility undergrounding would depend upon agreements between the City of Burlingame, Caltrans, PG&E, and other utility providers. This design option would be constructed as long as necessary funding and approvals are secured by the City of Burlingame.

What would stop Burlingame's funding?

Response to Comment Joyce Courtney Website-6

This is a duplicate comment. Please see response to Comment Joyce Courtney Email-6.

Comment Joyce Courtney Website-7

Page 123/207 (page 3-80): Migratory Birds

- Construction activities (including vegetation removal) will be conducted between September 30 and January 31 or a qualified biologist will conduct a nesting migratory bird survey within 72 hours prior to construction.
- If active nests of migratory birds are detected within 50 feet of construction activities for passerines or within 300 feet of construction activities for raptors, the biological monitor will establish an appropriate non-disturbance buffer to avoid direct effects of construction-related disturbance until work has been completed or birds have fledged.

Regarding the BMPs outlined in this section will occur? As nice as it sounds to read that a biologist will conduct a nesting bird survey, realistically, how thorough will this search be? Our property (which adjoins El Camino) is unique along the corridor, in which there is a large setback area, very full of dense shrubs and trees. Will a biologist actually walk through all the private properties and habitats within the stated distances? In our property along, within 50ft distance of the project area, there are multiple passerine nests, with multiple broods per breeding season. I do daily bird counts and track nesting, and I know how difficult it is to locate the nests, even though I have a lot of expertise as a birder, and intimately know the plants in my property. I'm just not clear how the biologist will find all the nests. If I know the nests are in my property, how can I confirm that the biologist will be similarly aware, and take the stated actions addressed in the BMPs?

Response to Comment Joyce Courtney Website-7

This is a duplicate comment. Please see response to Comment Joyce Courtney Email-7.

5.4.2.42 Gerald Weisl

Comment Gerald Weisl-1

El Camino Real in Burlingame is a treasure and has been a haven for more than 100 years.

Please patch the sidewalks and leave those lovely trees in place.

Thanks.

Response to Comment Gerald Weisl-1

Thank you for your comment. Please see Master Response 2: Impacts to the Howard-Ralston Eucalyptus Tree Rows, for information regarding tree removal in the project limits and Section

1.3 for information on the existing roadway conditions that require repair and why temporary fixes are not feasible.

5.4.2.43 Michael Wiebracht

Comment Michael Wiebracht-1

Good to see you both at the ECR DED Meeting at Burlingame High School. I am forwarding two emails with a number of attachments of Caltrans produced drawings and some photographs documenting the flooding history and some of the mitigation measures taken by Caltrans that I had sent to Alejandro July 5, 2020. There are a few points I would like to reiterate of the drainage issues on El Camino Real at Oak Grove Avenue based on my observations over the past 19 years.

- We have had 3 flooding events since 2002, of which, two were catastrophic. News footage taken by reporter Amber Lee was shown at a Burlingame City Council Meeting in early 2003 showing the extent of the flood and damage. I imagine Burlingame can make this footage available for you to see. One flooding event occurred after the drainage enhancement work was completed by Caltrans directed by Joseph Peterson. This means our building is still very much at risk of flooding. Naturally, due to climate change this flood risk is only increasing and this should also be factored in to designing a solution to this increasing flooding risk.
- It should be noted that there has never been any documentation of anyone observing the creek on the west side of El Camino Real overflowing. The drainage culvert running under El Camino Real has always accommodated all of the runoff flowing into it from the creek. The flooding issue is due solely to runoff from Floribunda Avenue flowing north up El Camino Real over the intersection at Oak Grove Avenue (and over the drainage culvert under the intersection) and continuing uphill until the water is dispersed into some of the below street level buildings along the westside of El Camino Real and down Fairfield Avenue.
- One of the drainage enhancements designed to mitigate the large amount of runoff flowing northbound through the intersection at Oak Grove Avenue was to create a spillway over the sidewalk to divert runoff from El Camino Real into the drain culvert running under El Camino Real. Creating a spillway over a sidewalk especially across the street from an Elementary School is not within standard regulations so another alternative must be designed.
- The current 7 inlet grates on the westside of El Camino Real from Oak Grove Avenue to 735 El Camino Real lack the capacity to carry the surge of runoff flowing uphill even with some of the runoff flowing over the spillway into the drainage culvert. This is partly due to the fact that strips of eucalyptus bark constantly fall over the inlet grates effectively sealing them from functioning properly.

Solution:

- I recommend that we take advantage of the existing drainage culvert running underneath El Camino Real along with the power of gravity. Instead of transporting the runoff over the drainage culvert as is being done now, design an inlet grate that is both large enough and positioned far enough from the curb into the center of the highway. An example to think about is something along the lines that is similar to an expansion grate you sometimes see on bridges. You can see through the grates to the water below. Realizing that there are utilities running under the highway, a large enough grate or series of grates may need to be positioned to protect the utilities. But the key is to have a large enough opening(s) and for them to be positioned far

enough from the curb to prevent them being sealed by bark and debris. If the size of the grates are large enough, gravity will simply allow the runoff to fall into the drainage culvert below and prevent it from flowing over the drainage culvert north to flood the buildings on El Camino Real. Please give my proposed solution consideration. I feel it may be the easiest and most cost effective solution to prevent flooding in this area.

Response to Comment Michael Wiebracht-1

Thank you for your comments and suggestions. Caltrans is aware of the flooding issue highlighted by the commenter. The project will likely be designed to place stormwater inlets on El Camino Real closer to the intersection with Floribunda Avenue to pick up flow from Floribunda Avenue. Inlets would be combination grates with curb openings so that drainage is maintained even if the grates get clogged with detritus.

The previous drainage enhancement work described in the comment was not constructed per plan due to utility conflicts. Since the proposed project will allow for utility relocation, Caltrans will be able to construct a system that adequately drains the flow from Floribunda Avenue such that the spillway is not needed.

Regarding the commenter's proposal to place inlets in the middle of the roadway, this could be a concern to traffic safety. Also, the reconstructed roadway will likely be crowned in the middle, which would not allow for stormwater to flow into median inlets.

5.4.2.44 Public Hearing Comment Card 1

Public Hearing Comment Card 1-1

If space allows hope there are left turn lane to easy traffic flow.

Response to Public Hearing Comment Card 1-1

As described in Section 2.1.4.1 of the Draft EIR/EIS, an alternative was considered that would have included left turn lanes. This alternative was rejected due to the potential to create significant impacts associated with congestion caused by the loss of a travel lane in each direction.

5.4.2.45 Public Hearing Comment Card 2

Public Hearing Comment Card 2-1

My perception of the project improved as a result of this meeting. I'm thankful the city of Burlingame and Caltrans are committed to improve ECR. I would, however, like to see some (unreadable) of improvement for bikers-whether that be bike boxes, improved crosswalks (which I heard IS happening) or perhaps a Class II bike lane. I also think ECR is a major transit corridor that needs improvement. I hope that City + Caltrans works with SamTrans to improve sheltering along the 3 mile stretch, and I'm glad the plans don't rule out a future BRT corridor or more simply a transit-only lane. With regards to "seizing" land from homeowners which is public (unreadable) - I think this is a good idea; it will help Caltrans increase sidewalk size which makes ECR more walkable and helps aid SamTrans in improving sheltering. Thanks for your time and consideration and I look forward to the completion of the project! [email unreadable]

Response to Public Hearing Comment Card 2-1

Thank you for your comment. Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives; the response to Comment Kat Wortham-4 for a description of potential mode shift; and the response to Comment Steve Carlson-19 for a description of bicycle and pedestrian improvements.

5.4.2.46 Public Hearing Comment Card 3

Public Hearing Comment Card 3-1

I appreciate the commitment on making the area safer for pedestrians, but I would hope that improvements can be made in the future to even better support cyclist & Samtrans ECR route. Allowing greater access to safe cycling or increasing the speed & frequency of the ECR bus may decrease congestion to the point where only one lane of traffic is needed in one direction with separate bus & bike lanes. I would hope that a greater focus is going to the ECR bus and a potential BRT line on El Camino. Prioritizing single occupancy vehicles will continue to promote pollution and only with more buses will the street be truly safe for pedestrians because of air quality - nobody wants to breathe in tons of exhaust.

Response to Public Hearing Comment Card 3-1

Thank you for your comment. Please see Master Response 1: Consideration of Multimodal Transportation Facilities in the Proposed Project and Alternatives.

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Chapter 8 References

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