

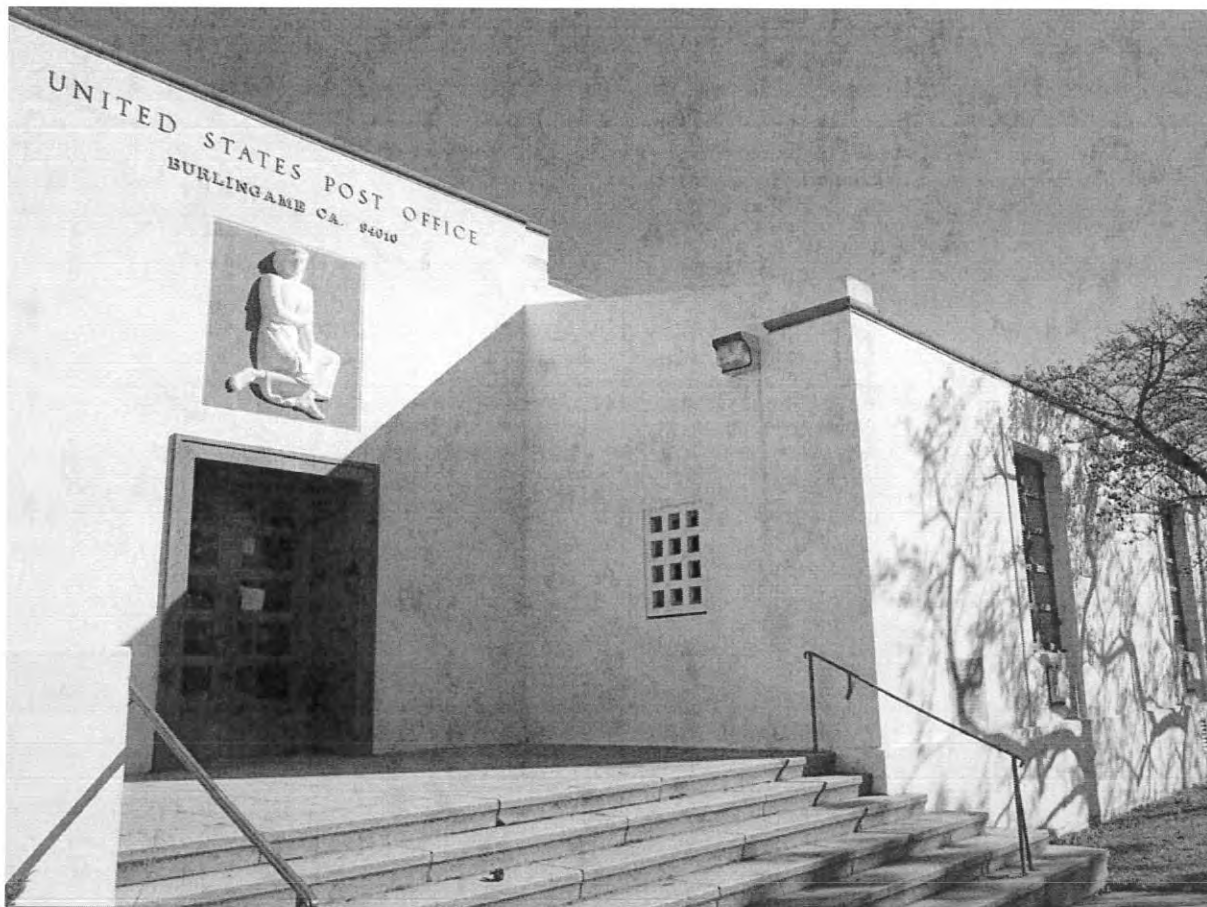
*220 Park Road – Staff Report Attachments*

**Secretary of the Interior's Standards Analysis  
Page & Turnbull, dated November 9, 2020**

**220 PARK ROAD  
SECRETARY OF THE INTERIOR'S STANDARDS ANALYSIS**

BURLINGAME, CALIFORNIA  
[P19091]

PREPARED FOR THE CITY OF BURLINGAME  
NOVEMBER 9, 2020  
FINAL





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## I. INTRODUCTION

This Secretary of the Interior's Standards Analysis has been prepared at the request of the City of Burlingame, for proposed alterations to 220 Park Road (APN 029-204-250). 220 Park Road was constructed from 1941-1942 as part of the nationwide post office construction program of the New Deal era to serve as the Burlingame Main Post Office. 220 Park Road is a one-story building located on a through-block lot in downtown Burlingame, with frontages on both Park Road and Lorton Avenue. The building was designed in a Spanish Eclectic (also called the Spanish Colonial Revival) style with Art Deco elements and features a large public lobby that is bookended by two identical entrances and entrance vestibules.

The former Burlingame Main Post Office at 220 Park Road has been found eligible for the National Register of Historic Places (National Register) under Criterion A (Events) and Criteria C (Architecture) and was found eligible for the local City of Burlingame Historic Register by Carey & Company through a 2008 survey for the Burlingame Downtown Specific Plan.<sup>1</sup> The property was deaccessioned from the United States Postal Service's property portfolio and sold in 2014, at which time a preservation covenant was attached to the building to ensure its continued preservation. This covenant guides the interpretation of the Secretary of the Interior's Standards (the Standards) in regard to future changes to the building.<sup>2</sup>

The proposed project includes demolishing the rear sorting room and Lorton Avenue façade of the former post office building, moving the historic resource temporarily off-site during the excavation and construction of two-stories of below-grade parking, returning the building to its historic location, and appending a six-story building behind the historic Park Road façade and the portion of the building which contains the highly significant historic public lobby. The completion of the proposed project will remove non-original material, rehabilitate the areas of primary significance to the building, and retain the majority of the character-defining features of the property.

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<sup>1</sup> The City of Burlingame has identified resources for listing on a local historic resource inventory, however, the system for listing and review has only recently been formally approved by the Burlingame City Council (as of November 2020); Carey & Co. *Draft Inventory of Historic Resources: Downtown Specific Plan* (February 19, 2008); TetraTech, "United States Postal Service Postal Historic Structure Report Developmental History for Burlingame Main Post Office, 220 Park Road," February 2013.

<sup>2</sup> United States Postal Service. "220 Park Road, Burlingame, CA: Preservation Covenant Language."

## Methodology

Page & Turnbull staff conducted a site visit on January 10, 2020, and the following documents were reviewed in the preparation of this memorandum:

- Korth Sunseri Hagey Architects (KSH), "220 Park Road, Burlingame, CA: Planning Resubmittal." Proposed Project renderings and plan set. Dated October 14, 2020. (Attached as Appendix A)
- Dostart Development Company, LLC, Sares Regis, and Korth Sunseri Hagey Architects. "220 Park Rd –Preservation & Construction Impact Plan," Updated October 1, 2020. (Attached as Appendix B)
- United States Postal Service. "220 Park Road, Burlingame, CA: Preservation Covenant Language." 2014. (Attached as Appendix C)
- TetraTech, "United States Postal Service Postal Historic Structure Report Developmental History for Burlingame Main Post Office, 220 Park Road," February 2013.
- Carey & Co. *Draft Inventory of Historic Resources: Downtown Specific Plan* (February 19, 2008).
- "Burlingame Post Office Competition Material, 1940-1942." National Archives and Records Administration, College Park, Maryland. Record Group 121-BS.

## II. SIGNIFICANCE & CHARACTER-DEFINING FEATURES

### Historic Significance

The Burlingame Main Post Office was constructed from 1941-1942 as part of the nationwide post office construction program of the New Deal era (**Figure 1**). The design, which was selected from a competition, was completed by Ulysses Floyd Ribble in a Spanish Eclectic style with Art Deco elements. The sculptural panels, placed over both the Park Road and Lorton Avenue entrances, were also selected by competition. The two identical panels, called "The Letter," were designed by a Los Angeles sculptor, James Hanson. The building served as the Burlingame Main Post Office until it was sold in 2014. Its divestment was part of a larger trend of property divestment by the United States Post Office (USPS), particularly in regard to New Deal era post office facilities in downtown locations throughout the country.

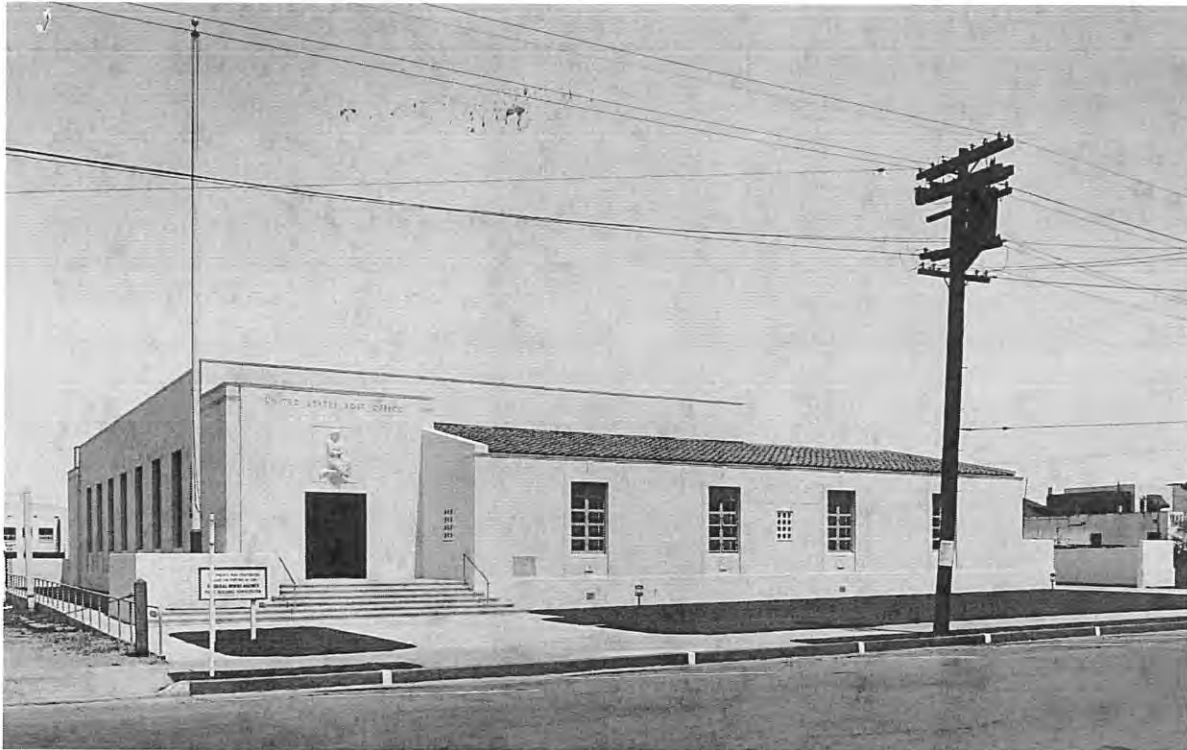


Figure 1: Finished Burlingame Main Post Office, showing primary Park Road façade, May 1942. Source: National Archives, College Park, MD. Record Group 121-BS.

As stated previously, the former Burlingame Main Post Office at 220 Park Road has been found eligible for the National Register of Historic Places (National Register) under Criterion A (Events) and Criteria C (Architecture) and is eligible for listing in the City of Burlingame's Historic Register. To meet local requirements for the protection of historic resources under Burlingame's Historic Preservation

Ordinance, alterations to the historic resource will be overseen by the Burlingame Planning Commission.

Additionally, as part of the USPS divestment procedure, a preservation covenant was attached to the property to ensure that the building and the features that communicate its historic significance will be maintained and/or restored. This Preservation Covenant names the City of Burlingame or the State Office of Historic Preservation (SHPO) as the primary parties to oversee future alterations to the property. The preservation covenant is discussed below.

### USPS Divestment and the Burlingame Main Post Office Preservation Covenant

With the divestment of the Burlingame Main Post Office building from the USPS's property portfolio, a historic preservation covenant (Preservation Covenant), to be overseen by the City of Burlingame or the State Historic Preservation Office (or SHPO, in this case, the California Office of Historic Preservation), was attached to the property. The purpose of the Preservation Covenant for the former post office at 220 Park Road is to bind the grantee to restoring, maintaining, preserving, or rehabilitating the historic character-defining features listed below (see Character-Defining Features) in accordance with the recommended approaches of the Secretary of the Interior's Standards.

The key text of the Preservation Covenant reads:

The Grantee hereby covenants on behalf of itself, its heirs, successors and assigns at all times to restore, maintain, preserve or rehabilitate the historic character of this property as described in Paragraph 2 in accordance with the recommended approaches of the "Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings" (National Park Service, 1995), in order *to preserve those qualities that make the property eligible for listing on the National Register of Historic Places.* [emphasis added]<sup>3</sup>

The Preservation Covenant outlines the historic exterior and interior features that are character-defining and should be retained or sensitively treated to meet the requirements of the covenant. The covenant specifies that the Park Road façade is the primary and most significant façade and suggests that there may be more flexibility on the Lorton Avenue façade; specifically:

Though the same exterior features on the main façade exist on the secondary (Lorton Avenue) façade, the historic primary entry to the building is from Park Road. For this reason, proposals for construction, alteration or rehabilitation of the

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<sup>3</sup> United States Postal Service. "220 Park Road, Burlingame, CA: Preservation Covenant Language," 1.



property that affect the historic features of the Park Road façade are to be viewed with a more critical eye (pursuant to the Secretary of the Interior Standards). There may be greater latitude for modifications to the Lorton Avenue façade that still retain the essence of the historic exterior features (e.g. modification of spatial relationships among identified character defining features or relative to the street frontage, relocation of features, replication, or similar design approaches that are consistent with the Secretary of [the] Interior[s] Standards).<sup>4</sup>

This excerpted language provides some guidance on the interpretation of the Standards for this building (for the full text of the Preservation Covenant please refer to Appendix C) and is thus considered the guiding document regarding the application of the Standards to the former Burlingame Main Post Office. Additionally, the covenant is overseen by either the SHPO or the City of Burlingame, and due to the additional regulatory responsibility of the City of Burlingame in approving the proposed project, the City of Burlingame is acting as the covenant holder and will oversee the regulatory requirements of the agreement.

### Character-Defining Features

For a property to be eligible for national, state, or local designation under one of the significance criteria, the essential physical features (or character-defining features) that enable the property to convey its historic identity must be evident. To be eligible, a property must clearly contain enough of those characteristics, and these features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.

The Preservation Covenant for the subject building includes a list of the character-defining features for the building that contribute to its significance as a representative example of a federally funded, New Deal era post office. According to the Secretary of the Interior's Standards for Rehabilitation, significance for architecture is supported by the retention of features that relate to design, materials, workmanship, location, setting, feeling, and association.

Exterior character-defining features of the building, as defined by the Preservation Covenant, include:

- The overall mass and plan of the main (Park Road) façade
- The poured concrete exterior siding and smooth stucco wall cladding
- Original metal frame windows
- Original bronze doors

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<sup>4</sup> Ibid.

- Red clay tile roof
- Cast stone Art Deco relief sculptures over the main entrances and under the windows
- Cast stone relief of a woman over the entrance doors<sup>5</sup>



Figure 2: Park Road (southwest) façade, looking northeast.

Interior character-defining features of the building, as defined by the Preservation Covenant, include:

- Original hanging ceiling light fixtures
- Marble wainscoting, including marble on vestibule walls
- Metal trim used throughout the interior: including metal grill work on the northwesterly wall of the lobby near the tall tables used by post office patrons (but not including non-metallic grillwork above the service windows)
- Original tall tables used for post office patrons
- Original service windows
- Original bronze bulletin board
- Federal star motifs
- Terrazzo flooring

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<sup>5</sup> The Preservation Covenant references bronze relief sculptures, however, "The Letter" is cast stone.

- Original windows and doors to and within lobby
- Cantilevered service desks
- Original post office boxes
- Original built-in lobby furniture, such as tables



Figure 3: Lobby, looking towards the Park Road entrance.



Figure 4: Lobby, looking towards the Lorton Avenue entrance.

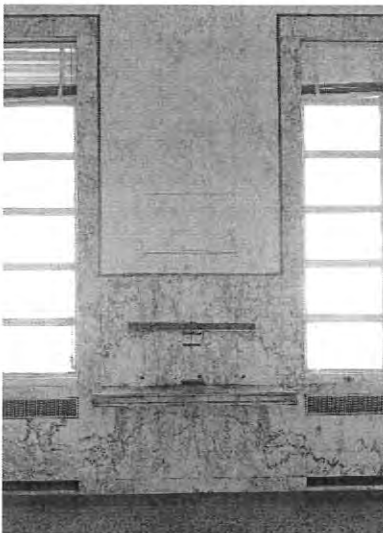


Figure 5: Cantilevered desks between lobby windows.



Figure 6: Vestibule doors to lobby.



Figure 7: Doors to office wing from at left and entrance doors from Park Road at right.

### III. PROPOSED PROJECT DESCRIPTION

The proposed project description is based on plans dated October 14, 2020, by Korth Sunseri Hagey Architects (KSH), and the Preservation & Construction Impact Plan, updated October 1, 2020, that were supplied to Page & Turnbull by the project team on October 14, 2020.

The project team will retain a preservation architect who will ensure continued conformance to the Secretary of the Interior's Standards for Rehabilitation, advise on the treatment of the historic resource and its character-defining features, and will prepare historic rehabilitation construction documents to support the proposed project.

#### OVERALL PROJECT DESCRIPTION

The proposed project will append a six-story building to the northeast and southeast facades of the subject building and will be located primarily within the large setback on the Lorton Avenue side of the parcel. The new addition will contain approximately two hundred and eighty parking spaces (across two levels of below-grade and ground-floor parking), ground-floor retail along Lorton Avenue, and five floors of office space. This requires the demolition of the Lorton Avenue façade of the historic building, which contains character-defining features identical to the primary Park Road façade but is considered within the Preservation Covenant to be an area more open to flexibility and the possible relocation of design features. The rear mailroom and loading areas of the historic post office building, which were not found to be character-defining features within the Preservation Covenant and through previous documentation, will also be demolished to make room for the addition.<sup>6</sup>

Along the primary (southwest) Park Road façade and the northwest façade – which contains the historic post office lobby – the historic resource is retained with little change to the materials, design, feeling, or massing of the building.

In order to protect the historic resource from potential damage due to vibration during the excavation and construction of the below-grade garage levels, the former post office building will be temporarily moved to an adjacent site. A lack of available space within and adjacent to the construction site precludes the option of moving the historic resource's lobby wing and office wing

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<sup>6</sup> See: United States Postal Service. "220 Park Road, Burlingame, CA: Preservation Covenant Language," 1; TetraTech, "United States Postal Service Postal Historic Structure Report Developmental History for Burlingame Main Post Office, 220 Park Road," February 2013.

off-site as a single unit, and instead the historic resource will be divided and moved in three parts.<sup>7</sup> A preservation architect, who will be joining the project team, will assist in the preparation for, and design and implementation of the building's move in order to safeguard the historic resource. The section which houses the historic lobby will be moved as a single unit and will include the entry terrace with its sidewalls and flagpole, as well as the northwest facing wall of the office wing. Below the level of the entry terrace, the precast concrete stair treads and risers will be deconstructed and stored for future reinstallation. The façade of the office wing that faces Park Road will be detached from its side walls with cuts parallel to Park Road. This section will include the partial height stucco clad wall that extends towards the existing driveway along the southeast property line. The third piece to be moved consists of the southeast-facing wall that contains the end gable of the office wing. The three sections of the historic building will be returned to their historic locations and orientations following the completion of this phase of construction. A new floorplate will be constructed for the office wing that will match the historic floor in its elevation and materiality, and a new roof structure will support the historic clay tile roof of the historic resource. The clay roof tiles, which will be disassembled and stored prior to moving the building, will be reinstalled to match original conditions. Once reassembled, the exterior of all remaining portions of the post office building will match historic conditions, to ensure the continued presence and materials of the historic resource's primary façade and character-defining features.

### Treatment of Exterior Façades

The primary façade of the historic resource will be retained in its entirety. At the far right (east) of the primary Park Road façade, a new office lobby will be constructed. This lobby, as proposed, is set back approximately 22'-9" from the front façade of the historic building and is further separated from the historic resource by a small setback – or hyphen – between the southeast-facing wall of the former post office's Park Road office wing and the west wall of the new office lobby. The placement of the lobby, set back along what was previously a driveway for mail trucks, retains the freestanding quality of the Park Road façade. Additionally, the lobby is clearly differentiated from the historic building through its use of a contemporary style with a fully glazed façade set between cast concrete side walls. The hyphen – which leads to a fire command room and a secondary service entrance for the office wing – will be further differentiated with a painted aluminum surface. Along this façade, the upper stories of the proposed addition are set back significantly, approximately 60 feet, from the primary façade of the historic resource. A portion of this setback, located behind the clay tile roof

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<sup>7</sup> The description of the proposed move of the historic resource is based on a conversation with representatives of 220 Park - Burlingame LLC (project sponsor), Garden City Construction (contractor), and Page & Turnbull, that took place on August 17, 2020, and is supported by the "220 Park Rd -Preservation & Construction Impact Plan," Updated October 1, 2020. (see Appendix B).

and parapet of the historic resource, will be used as an exterior terrace along the second floor of the addition.

The northwest façade of the building, which contains the historic lobby, will largely be retained with the exception of the section holding the Lorton Avenue entrance vestibule. The Lorton Avenue entrance vestibule will be demolished, and the new addition will meet the historic building at this point; the existing paired glass doors and side-lites will be retained in situ although rendered inoperable due to differing floor levels between the historic building and the new addition. The full length of the historic lobby will be retained with its seven bays of fenestration. A new terrace will be constructed along the northwest façade and three of the openings for the existing windows will be expanded down to meet the floor in order to insert doors between the historic lobby and the new terrace. This is intended to activate the building's relationship to a new public park that is planned for the adjacent parcel (currently city parking lot E). The existing, non-original accessibility ramp at the southwest corner will be replaced with a new code-compliant ramp.

Portions of the historic building along Lorton Avenue that will be demolished, including character-defining features, will be salvaged and reinstalled at other locations on the project site. These features are identical to those found on the Park Road façade. As specified in the Preservation Covenant, alterations to features on the Lorton Avenue façade are provided with more leniency, while the Park Road façade is considered more significant and the acceptable level of change is more limited. Historic features of the Lorton Avenue façade that will be salvaged and reinstalled at new locations within the addition include the sculptural panel (The Letter), the multi-lite metal frame double-leaf entry doors with decorative eagle transom and metal door surround, and the small sculptural eagle tiles under each window. As currently proposed, the Letter will be mounted over the stairs within the public entrance to the parking garage along the south corner of the northwest façade of the addition, the Lorton Avenue entrance doors and door surround will be mounted along the southeast interior wall of the public parking garage lobby, and the eagle reliefs may be installed along the northwest façade of the public parking garage lobby or will be incorporated into design features for the proposed park at the current location of the adjacent Parking Lot E.<sup>8</sup>

## Design of the New Addition

The new addition is designed in a contemporary style to remain differentiated from the historic structure, while complementing the historic resource through a reference to Art Deco massing and the treatment of windows and spandrel panels that are slightly recessed and vertically grouped. The proposed cladding material of the addition is primarily precast concrete, with some locations being

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<sup>8</sup> See Sheet A2.3. Korth Sunseri Hagey Architects (KSH), "220 Park Road, Burlingame, CA: Planning Resubmittal." October 14, 2020.

fully glazed such as along the sixth floor, the corner bay over the entrance to the public parking garage, and the Park Road lobby entrance to the addition. Other cladding materials used along the addition include brick veneer, ceramic tile, and painted aluminum.

Setbacks along Park Road, both at the ground floor and the second story help to preserve the spatial characteristics of the historic resource as a historically freestanding building with a rectangular geometric massing that illustrates elements of the Art Deco style. Additional setbacks along the northwest façade and Lorton Avenue create terraces and a variable stacked volume that complements the Art Deco features of the post office building and its historic context.

Areas where the new addition meets the historic building include the north end of the former post office's northwest façade (containing the historic lobby) and at the far east (right) end of the Park Road façade where the new office lobby will be constructed (discussed above). As currently proposed, the southwest-facing ground floor of the addition features a flat concrete wall at its right end (where it meets the historic building's northwest facade), which is different in both its texture and color from the painted stucco of the historic resource. Additionally, the fenestration of the addition's second floor at this location clearly illustrates that this portion of the façade follows a different interior arrangement and floor height than the historic resource. The new wall space at the ground floor may be used to solicit a public art piece, which would be in keeping with the history of public art intended for the property and would complement the historic post office typology.

### Interior Spaces: Historic Lobby and Office Wing

Within the former Burlingame Main Post Office, the interior lobby and Park Road vestibule will be preserved with few changes to the resource's historic materials, spaces, or features. The Park Road vestibule will retain its marble wainscoting, interior multi-lite double doors and multi-lite flanking side panels, historic light fixture, and historic glass-panel double doors that lead to the historic office wing along Park Road. Areas of damage to the plaster wall and ceiling surfaces and marble wainscoting will be repaired.

The historic lobby is the most significant interior space in the former post office building. As such, almost all character-defining features are planned to be retained, including historic pendant light fixtures (including those with federal star motifs), terrazzo flooring, original wall-mounted tables, original service windows, original mounted metal vitrines, and original post office boxes. The vestibule doors and their matching side-lites that lead to both the Park Road and Lorton Avenue entrances will be retained. The primary, Park Road vestibule will be retained in place; however, the Lorton Avenue vestibule doors will be non-operable – as this is where the historic resource and new addition meet – and the double doors and side-lites will be made into a display area that may house

interpretive displays and salvaged historic material. While one door opening exists within the southeast wall of the lobby, two additional openings will be added to provide access between the lobby and a rear service hall (located behind the southeast lobby wall) that will provide access to the office wing. These openings and the service hall will support the reuse of the lobby for a possible food and beverage retail use. The existing opening – at the north end of the lobby – will lead to a new bathroom and janitorial closet. One opening is proposed to be installed where an existing opening for mail and package drop-off is located to the right of the northern (left) service window, while the second new opening is proposed to be installed at the location of the wall mounted bulletin board (or vitrine) at the south end of the lobby.<sup>9</sup> Both openings will require the removal of a small amount of marble wainscoting along the lobby wall, however the placement of new doorways in the existing location of an opening and a bulletin board will limit the amount of marble wainscoting to be removed, and will allow for the retention of all post office boxes and service windows. Any original marble wainscoting that must be removed will be salvaged to repair or replace other historic material during the rehabilitation of the historic resource.

Features that are largely being retained but may be salvaged in select locations include the lobby's marble wainscoting and historic metal grilles located under the center three windows along the northwest wall. Additionally, the upper portions of these three metal sash windows will be retained while the lower portions will be altered and selectively removed to allow doorways to be inserted, providing access from the lobby to the proposed exterior terrace and park. Features that are not historically significant and will be removed include the plasterboard carousel near the Lorton Avenue entrance, the acoustical tile on the walls and ceiling, the plaster finish on the ceiling, and the fluorescent light fixtures over the wall-mounted tables.<sup>10</sup>

The Lorton Avenue entrance vestibule will be partially demolished for the erection of the addition. As mentioned above, the original main entrance door assembly will be relocated, while the original door assembly between the Lorton Avenue vestibule and the lobby will be retained in place but rendered inoperable (see above). As the rest of the vestibule will be demolished, historic materials that may be salvaged include the marble wainscoting, terrazzo flooring, and the pendant Art Deco light fixture.

Non-public areas housed within the office wing parallel to Park Road include historic offices, restrooms, closets, and two vaults with vault doors. None of these interior spaces or features have been determined to be character-defining. The double doors leading to the office wing from the Park Avenue vestibule will be retained along with the metal "Postmaster" lettering mounted over the

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<sup>9</sup> Ibid.

<sup>10</sup> These features were determined to not be character-defining features as described in the Preservation Covenant.



doorway. Due to the need to move the primary historic elements of the building off-site during initial phases of construction, the interior of the office wing including the floor and roof will be demolished, allowing the exterior walls to be moved in two pieces to the parking spaces along Park Road for storage. The clay tile roof of the office wing is a character-defining feature of the building and will be disassembled, stored during construction, and then reinstalled on a new roof structure that matches the pitch and dimensions of the historic roof design. When the exterior walls are reinstalled in their original location, a new floor structure will be installed to match the elevation of the historic floorplate, ensuring that the interior volume will read as it was historically when viewed from the exterior.

The office wing will be converted to retail use. While these historically non-public areas have not been found to contain character-defining features, the project as proposed will salvage some features and materials as possible for reuse, including the existing vault door assemblies within the offices and sorting room, and the original marble panels in the men's restroom at the south corner, as well as the marble panels in the women's bathroom at the east corner of the Lorton Avenue side of the building.

## IV. SECRETARY OF THE INTERIOR'S STANDARDS ANALYSIS

The following sections assess the proposed project's compliance with the Secretary of the Interior's Standards for Rehabilitation.

### Secretary of the Interior's Standards

The *Secretary of the Interior's Standards for the Treatment of Historic Properties* (the Standards) provide guidance for reviewing proposed work on historic properties and are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources.<sup>11</sup> Conformance with the Standards does not determine whether a project would cause a substantial adverse change in the significance of a historic resource. Rather, projects that comply with the Standards benefit from a regulatory presumption that they would have a less-than-significant adverse impact on a historic resource. Projects that do not comply with the Standards may or may not cause a substantial adverse change in the significance of an historic resource.

The Secretary of the Interior offers four sets of standards to guide the treatment of historic properties: Preservation, Rehabilitation, Restoration, and Reconstruction. The four treatments are summarized as follows:

**Preservation:** The Standards for Preservation “require retention of the greatest amount of historic fabric, along with the building's historic form, features, and detailing as they have evolved over time.”

**Rehabilitation:** The Standards for Rehabilitation “acknowledge the need to alter or add to a historic building to meet continuing or new uses while retaining the building's historic character.”

**Restoration:** The Standards for Restoration “allow for the depiction of a building at a particular time in its history by preserving materials from the period of significance and removing materials from other periods.”

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<sup>11</sup> Anne E. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*, (U.S. Department of the Interior National Park Service Technical Preservation Services, Washington, D.C.: 2017), accessed July 23, 2020, <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>.

**Reconstruction:** The Standards for Reconstruction “establish a limited framework for recreating a vanished or non-surviving building with new materials, primarily for interpretive purposes.”<sup>12</sup>

Typically, one set of standards is chosen for a project based on the project scope. For the purposes of the proposed project at 220 Park Road, the Standards for Rehabilitation, which “acknowledge the need to alter or add to a historic building to meet continuing or new uses while retaining the building’s historic character,” would be the appropriate Standards for the proposed project’s scope.<sup>13</sup>

### Standards for Rehabilitation Analysis

The following analysis applies each of the ten Standards for Rehabilitation to the proposed project at 220 Park Road. This analysis is based on the resubmittal plan set of the proposed project dated October 14, 2020, by Korth Sunseri Hagey Architects (KSH), and the Preservation & Construction Impact Plan, updated October 1, 2020, that were supplied by the Project Team.

**Rehabilitation Standard 1:** *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*<sup>14</sup>

*Discussion:* The proposed project will expand the retail and office uses of the parcel through the construction of the addition, while reusing the historic lobby and the office wing of the historic resource for retail use. The historic lobby was used in a retail capacity as a post office lobby with mailboxes and service counters for the public from its completion in 1942 until its sale by the USPS in 2014. Therefore, while the lobby will see changes to its pattern of use, as it will likely be used in a food and beverage retail capacity, it will remain as a retail space that is open to the public. The original office wing along the primary façade will be converted retail use and may be a support space for the retail tenant of the lobby, with new bathrooms, a kitchen, and storage space. The interior of the office wing – which does not contain any character-defining features – will be removed during the process of moving the historic elements of the building off-site during the early phases of construction. When the historic lobby space and southwest and northwest façades are reassembled on site, a new interior will be constructed within the office wing. The proposed change in use and the construction of a new interior will not impact the fenestration or exterior envelope of the office wing and any required venting and utility access will be carried through the new addition

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<sup>12</sup> Ibid.

<sup>13</sup> Ibid.

<sup>14</sup> This and the following Standards are listed in Grimmer (2007) and also at National Park Service, U.S. Department of the Interior, “Technical Preservation Services: Rehabilitation as a Treatment,” accessed July 23, 2020, <https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm>.

so as not to impact the features and massing of the historic building. Minimal change to the distinctive materials, features, spaces, and spatial relationships of the historic resource will be required to allow for its expanded use as a retail space and the proposed project is consistent with Standard 1.

**Rehabilitation Standard 2:** *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.*

*Discussion:* The proposed project retains and preserves nearly all of the character-defining features and spaces of the historic resource. In order to complete the project as proposed, the Lorton Avenue façade will be demolished and the mail sorting room and back of house spaces will be demolished to allow for the construction of the new addition. While character-defining features are present on the Lorton Avenue façade, these features are identical to those found on the more significant Park Road façade. Guidance approved by the SHPO and outlined in the Preservation Covenant attached to the former post office building allows for more flexibility and change on the Lorton Avenue façade in order to facilitate the reuse of the historic building. Due to this guidance, the removal and relocation of character-defining features on the Lorton Avenue façade is an acceptable step as long as those same features on the Park Road façade remain intact. Additionally, the features that will be removed along Lorton Avenue – including the sculptural panel (The Letter) and the multi-lite metal frame double-leaf doors with decorative eagle transom and pressed metal door surround will be salvaged and reinstalled in new locations within the addition. The small sculptural eagle reliefs will be salvaged and are planned to be integrated either into the exterior façade of the new public parking garage lobby or into features of the planned park on the adjacent lot (currently Parking Lot E).

The proposed project will retain the significant spatial characteristics of the building and members of the public will continue to interact with the primary spaces of the building as was historically intended; the public will approach from Park Road, climb the stairs to the entry terrace, enter the main doors into the vestibule, and travel through the vestibule into the historic lobby space. At both the exterior and interior spaces the character-defining features, historic materials, and spatial characteristics of the building will be retained. The articulation of the addition with its large setback from Park Road allows the historic resource to retain its historic setting to a high degree, maintaining the oblique view of the Park Road façade and lobby wing as they were historically viewed from the public right-of-way. Similarly, the setback of the new office lobby at the east end of the Park Road façade, and the hyphen between the historic resource and new lobby, allows the historic resource to continue to read as a separate volume from the new addition which is positioned towards Lorton Avenue and the northeast corner of the parcel.

Therefore, the proposed project is consistent with Standard 2.

**Rehabilitation Standard 3:** *Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*

*Discussion:* The proposed project does not create a false sense of historical development for the former post office building as the addition and proposed changes are suitably differentiated in style and materials. The project will not add conjectural features or design elements. In areas of historic significance, the treatment of the historic resource is that of a rehabilitation, repairing damaged material and replacing material in kind when necessary. In areas where extensive damage necessitates replacement, features will be recreated using documentary evidence and will not be conjectural. Therefore, the proposed project is consistent with Standard 3.

**Rehabilitation Standard 4:** *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*

*Discussion:* The historic resource's period of significance is 1942, dating to the year that the building was completed. Changes to the subject building since its completion in 1942 have been relatively minor and no changes to the subject building that have occurred since its construction have gained historic significance in their own right. Non-original features that have been added since the building's construction will be removed as they are not considered significant. The removal of non-original features, such as the plasterboard carousel within the historic lobby, will restore the lobby to its original open volume. Therefore, the proposed project is consistent with Standard 4.

**Rehabilitation Standard 5:** *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

*Discussion:* The materials, features, finishes, and construction techniques that characterize the former post office building will largely be retained. On the exterior, these features include the building's stucco cladding, sculptural relief tiles, multi-lite metal entrance doors with decorative transom and surround, multi-lite metal windows, entry terrace with flagpole, and clay tile roof. The physical fabric of these exterior features is being retained along the primary (southwest) Park Road façade and the northwest façade. As described in the discussion of Rehabilitation Standard 2, while the character-defining features on Lorton Avenue are either being demolished or salvaged and reinstalled in new locations, the materials of the primary Park Road façade and the northwest façade will remain largely intact.

While moving a historic structure is generally not considered to be a preferred treatment by the Standards, when associated construction requirements pose a danger to the integrity of the historic resource, moving the building temporarily can help to safeguard the resource. In this case, moving the building will protect the former post office from vibration, excavation, and subsidence risks as the proposed below-grade parking are excavated and foundations erected. A preservation architect, who will be retained by the project team, will assist with the design, planning, and implementation of the building's temporary relocation. The three sections of the historic resource will be returned to their exact historic location and will be reassembled, with careful repair to the areas that had been cut apart. The historic resource, once reassembled, will retain its grading, orientation, and historic landscaping in order to convey its historic relationship to the street. As long as adequate protective treatments and methods are undertaken to protect the resource when it is moved, and it is returned to its exact historic location, the proposed project will retain those features that characterize the property – namely its character-defining features – which make it eligible as a historic resource. While interior material of the office wing, including roof and floor structures will be removed and later reconstructed in new materials, this area did not contain any character-defining features and the appearance and materiality of the historic former post office will remain intact.

Historic materials of the interior, including the marble wainscoting, historic post office boxes, service windows with bronze grilles, and wall-mounted desks will be retained and illustrate the care and craftsmanship that was invested in the creation of this 1942 post office.

As the vast majority of the building's materials, features, and finishes will be retained, the building will continue to express its association with the New Deal era and the craftsmanship, historic character, and design that marks that era of post office construction. Therefore, the proposed project is consistent with Standard 5.

**Rehabilitation Standard 6:** *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

*Discussion:* Historic features and materials of the historic resource will be repaired as needed and replaced in kind when necessary. Salvaged material in areas of selective demolition along the southeast and Lorton Avenue façades of the building will provide additional historic material for the repair of deteriorated features. Additionally, in areas where extensive damage necessitates replacement, features will be recreated using documentary evidence and will not be conjectural.

Due to the need to temporarily move the historic resource off-site during the excavation of the site, the entrance stairs along Park Road will be disassembled, cleaned, labelled, and stored for future reinstallation. When the former post office is returned to its historic location, the cast stone entrance stairs will be reinstalled, thereby retaining original materials. Any damaged elements that must be replaced will be replaced in kind or with material salvaged from the matching Lorton Avenue entrance stairs. In addition, the areas along the exterior facades of the office wing that will be cut to allow the building to be partially disassembled and moved off-site, will be repaired once the building is reassembled in its historic location. The cuts which will be made parallel to Park Road along the southeast-facing wall and the northwest-facing wall are placed to minimally impact the building's decorative and character-defining features, and will sensitively treat the decorative molding return along both of these façades. When reassembled, the locations of the cuts will be repaired and finished in painted stucco to match the existing cladding of the historic structure, allowing the building walls to maintain their historic design as a monolithic structure.

Areas along the interior of the office wing that will be demolished prior to the disarticulation of the exterior walls will be replaced with modern materials but will be chosen to match the design and materiality of the space. While the structure of the gable roof will be of new construction, the visible portion of this element – the exterior roof cladding – will consist of the original clay tile roofing, which will be reinstalled, and the roof form will match the historic pitch and dimensions of the original roof. From the exterior, the Park Road façade will retain its historic appearance and materiality and will retain all character-defining features.

Additional character-defining features of the historic resource will be retained and protected during the construction of the addition. These features will be repaired, if necessary. Therefore, the proposed project is consistent with Standard 6.

**Rehabilitation Standard 7:** *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

*Discussion:* Repair work to the historic resource – including to its exterior stucco cladding, clay tiles, decorative reliefs, historic windows and doors, and various features of the historic lobby including its marble wainscoting, historic bronze features, historic lamps, and built-in furnishings – may involve a variety of treatments, depending on the condition of the materials. If it is necessary to propose chemical or physical treatments, these methods will not involve the use of harmful treatments that would damage the historic elements and will follow the *Secretary of the Interior's Guidelines for the Treatment of Historic Properties*. The project team will retain a preservation architect who will guide the physical treatments of the historic resource and its character-defining features. If surface cleaning of the building and its historic materials is determined to be necessary, such cleaning will

be undertaken using the gentlest means possible and will also follow the *Secretary of the Interior's Guidelines for the Treatment of Historic Properties*. Provided that all treatments are undertaken using the gentlest means possible, the proposed project is consistent with Standard 7.

**Rehabilitation Standard 8:** *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

*Discussion:* The proposed project will involve excavation of the site for the creation of two levels of below ground parking. If any archaeological material is discovered during this process, provided that standard discovery procedures for the City of Burlingame are followed, the proposed project is consistent with Standard 8.

**Rehabilitation Standard 9:** *New additions, exterior alterations or related new construction will not destroy historic materials, features and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.*

*Discussion:* The new addition is designed in a contemporary style to remain differentiated from the historic structure, while complementing the historic resource through a reference to Art Deco style massing and the treatment of windows and spandrel panels that are slightly recessed and vertically grouped. Additionally, the use of precast concrete as a cladding material was chosen for its similar properties and aesthetic to stucco, yet remains differentiated through its color and texture. While the new addition is at a larger scale than the historic resource, its articulation is referential to that of larger New Deal era post office structures, and its overall mass is located as far to the northeast of the parcel as possible, moving the larger mass of the addition towards Lorton Avenue and away from the historic resource, as though it were a separate building located on Lorton Avenue.

Locations where the historic resource meets the new addition are limited to the north end of the historic resource's northwest façade (containing the historic lobby) and the east end of the Park Road façade where a new lobby for the addition will be constructed. In both locations the addition is suitably differentiated from the historic resource.

At the northwest façade, the addition meets the former post office with a perpendicular southwest-facing wall that consists of precast concrete along the first floor that is differentiated in texture and color from the stucco of the adjacent historic resource. The second floor of the addition features a large section of glazing over an exposed steel beam, and the upper stories continue the overall glazing pattern of the main portion of the new addition. The solid ground floor wall may be used to solicit a public art piece that would complement the original role of public art within the federal post



office building program of the New Deal era. The addition of a new public art piece on the site further complements the historic intent of the site as a mural was originally intended to be included within the Burlingame Main Post Office but was eliminated due to budgetary limitations during construction.

The new lobby to be built at the east (right) end of the Park Road façade will be visually and physically separated from the historic building through the presence of a small setback section – or hyphen – that allows for the full view of the southeast-facing wall of the historic office wing. The lobby itself will consist of a modern fully glazed façade set between cast concrete side walls, and the front plane of the lobby will be setback approximately 22'-9" from the front plane of the historic resource, ensuring that the former post office retains its visual prominence along Park Road. As such, the new addition is both differentiated and compatible in design and materials and protects the integrity of the historic resource through its sensitive treatment of the primary façade along Park Road and the areas where the historic resource and the new addition meet.

Therefore, the proposed project is consistent with Standard 9.

**Rehabilitation Standard 10:** *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

*Discussion:* The design of the proposed project aims to leave the massing, design, and features of the primary Park Road façade of the historic resource and its northwest façade intact, maintaining the traditional pedestrian view of the historic resource as viewed from Park Road and seen in historic photographs of the building. While a large six-story addition is proposed to be appended to the rear of the historic structure and requires the demolition of portions of the historic resource, the placement of this addition was strategically located to be sensitive to the primary façade of the historic resource. The new office lobby to be constructed at the east end of the Park Road façade is attached to the historic resource via a small setback – or hyphen – that retains the full oblique view of the administrative wing along the primary Park Road façade. If, in the future, the addition was to be demolished, the historic resource would substantially retain its essential form and integrity. While the northern end of the lobby wing (the northwest façade) will be removed, somewhat affecting the overall massing of the structure in its symmetry along this façade, the most significant spaces of the resource would remain and would allow the building to continue to express its significance and character-defining features.

The proposed treatment of the interior lobby and entrance vestibule, as separate from the new addition, ensures that in the future changes to the addition – including its removal – would allow these significant interior spaces to remain intact.

While the project requires the demolition of a large amount of original fabric along Lorton Avenue, the rear sorting and loading areas, and along the interior of the office wing, these locations were not found to hold character-defining features and the project as a whole successfully retains the key spaces, features, massing, and characteristics of the resource such that it substantially meets the requirements of Standard 10.

### Summary of the Secretary of the Interior's Standards Analysis

As the above analysis illustrates, the proposed project for the former post office building at 220 Park Road, as currently designed, appears to be in full compliance with Standards 1 through 9 and substantially in compliance with Standard 10. Thus, the former post office building would retain integrity and continue to be able to express the features, design, and context that make it eligible for listing or designation on the National Register, the California Register, and the local City of Burlingame Historic Register. As the proposed project is in overall compliance with the Standards for Rehabilitation, it appears to meet the protective intent of the Preservation Covenant.

## V. CONCLUSION

The former Burlingame Main Post Office property at 220 Park Road has been found eligible for the National Register under Criterion A (Events) and Criterion C (Architecture) and has been found eligible for listing on the local Burlingame Historic Register through survey evaluation. The historic resource illustrates the reach of the federal post office building campaign that was undertaken during the New Deal era – ranging from 1933 to the beginning of World War II – and the building is a good example of the use of the Spanish Eclectic (or Spanish Colonial Revival) style and the Art Deco style as employed by architect Ulysses Floyd Ribble to meet the requirements of standardized post office construction, while integrating locally popular styles. When the historic post office was sold by the USPS in 2014, a Preservation Covenant was attached to the property to guide the future preservation of the building.

Although the proposed project results in a change to the Lorton Avenue façade of the historic resource through its wholesale demolition, the language of the Preservation Covenant provides further guidance for the interpretation of the Standards and allows for more change to occur along Lorton Avenue, recognizing that the Park Road façade is the more significant and primary façade. Through this guidance, the salvage and relocation of historic elements of the Lorton Avenue façade is considered acceptable as long as the primary Park Road façade retains its character-defining features, which include its historic materials, decorative features, and historic massing. The rehabilitation of the historic primary façade, the historic lobby and entrance vestibule, and the northwest façade allow the building to communicate its historic significance as a New Deal era post office.

The proposed project was evaluated according to the Secretary of the Interior's Standards for Rehabilitation and was determined to fully comply with Rehabilitation Standards 1 through 9, and to be substantially in compliance with Standard 10. The building will continue to retain sufficient historic integrity to remain eligible for listing on a local, state, or national register. Therefore, the proposed project has been determined to substantially comply with the Standards and the guidance of the Preservation Covenant.

## VI. REFERENCES

### Published Works

- Boland, Beth M. *National Register Bulletin 13: How to Apply the National Register Criteria to Post Offices*. Washington, D.C.: U.S. Department of the Interior, National Park Service, 1984, revised 1994.
- California Office of Historic Preservation. *Technical Assistance Bulletin No. 7: How to Nominate a Resource to the California Register of Historical Resources*. Sacramento: California Office of State Publishing, September 4, 2001.
- California Office of Historic Preservation. *Technical Assistance Bulletin No. 8: User's Guide to the California Historical Resource Status Codes & Historic Resources Inventory Directory*. Sacramento: California Office of State Publishing. November 2004. Accessed August 12, 2020, <http://ohp.parks.ca.gov/pages/1069/files/tab8.pdf>.
- California Office of Historic Preservation, "What is the California Register and What Does it Have to do with CEQA?", [https://ohp.parks.ca.gov/?page\\_id=21724](https://ohp.parks.ca.gov/?page_id=21724)CEQA Guidelines. Accessed May 10, 2018. <http://resources.ca.gov/ceqa/guidelines/>.
- Grimmer, Anne E. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. U.S. Department of the Interior National Park Service Technical Preservation Services, Washington, D.C.: 2017. Accessed June 23, 2020, <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>
- National Park Service, U.S. Department of the Interior, *National Register Bulletin 15: How to Apply the National Register Criteria of Evaluation*, U.S. Department of the Interior, revised 1997.
- National Park Service, U.S. Department of the Interior, *National Register Bulletin 16A: How to Complete the National Register Nomination Form*, U.S. Department of the Interior, 1997.
- National Park Service, U.S. Department of the Interior, "Technical Preservation Services: Rehabilitation as a Treatment," accessed June 23, 2020, <https://www.nps.gov/tps/standards/four-treatments/treatment-rehabilitation.htm>.

### Reports

- TetraTech, "United States Postal Service Postal Historic Structure Report Developmental History for Burlingame Main Post Office, 220 Park Road," February 2013.
- Carey & Co. *Draft Inventory of Historic Resources: Downtown Specific Plan*. February 19, 2008.
- United States Postal Service. "220 Park Road, Burlingame, CA: Preservation Covenant Language."

### Archival Material

“Burlingame Post Office Competition material, 1940-1942.” National Archives and Records Administration, College Park, Maryland. Record Group 121-BS.

### Project Drawings

Korth Sunseri Hagey Architects (KSH), “220 Park Road, Burlingame, CA: Planning Resubmittal.” Proposed Project renderings and plan set. Dated October 14, 2020.

Dostart Development Company, LLC, Sares Regis, and Korth Sunseri Hagey Architects. “220 Park Rd – Preservation & Construction Impact Plan,” Updated October 1, 2020.

### Internet Sources

Sanborn Map Company Fire Insurance Maps, available online at the San Francisco Public Library History Center. <http://sanborn.umi.com.ezproxy.sfpl.org/splash.html>

## VII. APPENDIXES

### APPENDIX A – PROJECT DRAWINGS

Korth Sunseri Hagey Architects (KSH), "220 Park Road, Burlingame, CA: Planning Resubmittal."  
Proposed Project renderings and plan set. Dated October 14, 2020.

*220 Park Road – Staff Report Attachments*

**Public Comment Letters/Emails**

**From:** DM [REDACTED]  
**Sent:** Thursday, July 23, 2020 9:39 AM  
**To:** Burlingame Planning Dept <planningdept@burlingame.org>  
**Subject:** Burlingame Post Office Redevelopment, 220 Park Road

Dear, Burlingame Planning Commission members,

Firstly, I do want to thank all of you for serving on the Planning Commission. I believe this work and efforts goes beyond just your regular work. It is much appreciated.

Secondly, I want to comment on an article I just read in The Daily Journal on the Post office redevelopment at 220 Park Road. Although the plans I saw look interesting and good, I am just wondering if we should really think out of the box on this subject. We have an incredible piece of property at this site, and I am just wondering if we should give this some re-thinking and build something extraordinary, something that would be admired for ages and something that would draw people not only from around the Bay Area but possibly the world to admire. I think of Bilbao, Spain where Frank Gehry build his famous museum. This structure has attracted people, including myself, from around the world, and actually gave Bilbao City itself a much bigger name. I am not necessarily stating that you consider Gehry but just consider something Big and Different that could be a piece of architecture that would be admired for many generations to come and that would highlight the insight all of you had to do something dramatic and noteworthy.

It is just something to ponder and to think of a way to build upon this incredible piece of property and in the incredible community of Burlingame. Again, the proposed building looks nice but does it really stand out and would it distinguish itself from other structures in the surrounding cities? Why not build something that would really stand out, build upon the existing structure, and be admired for generations to come?

Thank you for your time,

David Gonzalez  
[REDACTED]



**From:** Jane G  
**To:** CD/PLG-Catherine Keylon  
**Cc:** steve pade  
**Subject:** Comments on Post Office site development  
**Date:** Friday, October 16, 2020 5:51:26 PM

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Hi Catherine,

I hope you and your entire family are doing well.

I would like to comment on the Post Office site development at 220 Park Road.

In general I do not think the development should exceed any of the existing code requirements. This would include any variances for height, parking, land use, etc. The downtown development plan prepared by your City staff and approved by Council a number of years ago set forward guidelines for the downtown anticipating future projects in the area including the post office site. The developer should be required to meet these requirements. I am surprised we are even reviewing this project with all these variances. This should never have been moved forward in the review process until they met all the City requirements. Otherwise why have the requirements in the first place and go through the Specific Area planning process.

Thank you for forwarding these comments to the appropriate review committees.

Steve Pade and Jane Gomery  
[REDACTED]

**From:** Jeff Doss  
**To:** CD/PLG-Catherine Keylon  
**Subject:** Project at the old post office  
**Date:** Thursday, September 17, 2020 8:04:23 PM

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Hi, I am concerned about the proposed height of the development at the old post office. What's the next step? Does the city council still need to approve it?

Thanks,  
Jeff

**Staff Comments**



July 14, 2020

Mr. Andrew Turco  
901 Mariners Island Blvd., Suite 700  
San Mateo, CA 94404


**Subject: Condition of Approval for Alternate Means of Protection  
220 Park Road, Burlingame**

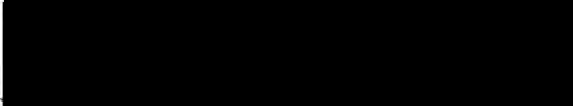
Dear Mr. Turco,

I have reviewed your Alternate Means of Protection request submitted to the Central County Fire Department on July 8, 2020. After evaluation of the project scope and with consideration of CCFD's operational capabilities, your proposed mitigations are conditionally approved along with further clarification of specific mitigations due to the project's lack of fire apparatus access. These mitigations are considered with the proposed I-B building construction, any change to a lower construction type will require a re-evaluation of this application.

1. The fire sprinkler system shall be equipped with quick response sprinkler heads throughout the garage levels.
2. The fire command center shall be a minimum of 144 square feet, with a minimum dimension of 10 feet.
3. Standpipe outlets shall be located immediately outside the stairwell doors on the roof level. All other standpipe outlets shall be located at the intermediate stairwell landing within each stairwell.

If you accept the above conditions, please sign the bottom of this letter and return. The approved AMP request packet and this letter shall be integrated into the project plans submitted to the City of Burlingame. Approval of this Alternate Means of Protection is specific to this project and is not intended to set a precedent for other projects. Additionally, an application review fee of \$229.00 must be remitted, made payable to the Central County Fire Department, prior to final approval signature of this AMP application.

  
Christine Reed  
Battalion Chief/Fire Marshal

Accepted by: 

Andrew Turco

Date: 7/14/2020



## Request for Alternate Means of Protection or Methods of Construction

Date Submitted: 7/8/2020 Building Permit: \_\_\_\_\_

In accordance with section §2.02, Title 19 California Code of Regulations, the undersigned requests approval of alternate means of protection for:

**Project Name:** 220 Park Road

**Project Address:** 220 Park Road, Burlingame, CA

**Subject of Alternative** (separate forms must be completed for each different item):

Separation distance between the buildings exterior walls and fire apparatus access roads

**Code Requirement Requesting Mitigation** (specify code edition and section):

2019 California Fire Code Section 503.1

**Justification** (attach copies of pertinent information):

Please see attached package by The Fire Consultants. The design proposes to provide additional protection to facilitate fire department operations in the building to allow an increase in the distance between the exterior walls and the fire access roads.

**Alternate Requested By:** Andrew Turco

Andrew Turco Digitally signed by Andrew Turco  
Date: 2020.07.08 12:35:25 -0700

Signature

**Requestor Address** \_\_\_\_\_

**Requestor Phone:** \_\_\_\_\_

**For Staff Use Only**

**Date Reviewed:** 7/14/20

**Findings:** All approval documents shall be scanned and included in building permit plan set.

**Approved**  \_\_\_\_\_

**Fire Marshal:** \_\_\_\_\_

**REQUEST FOR ALTERNATE MEANS OF PROTECTION**  
**FIRE DEPARTMENT ACCESS**

220 Park Road  
Burlingame, CA

Date: June 24, 2020

Project Description: The project consists of a new Type I-B mixed use building at 220 Park Road. The building is being designed based on the 2019 California Building Code (CBC) and California Fire Code (CFC). The building includes two below grade levels housing primarily enclosed parking. Level 1 includes parking areas, retail spaces, building service spaces, and the main entry lobby space. Levels 2 – 6 consist of open office spaces. The building does not include an occupied roof. The overall height measured between the lowest level of fire department access and the highest occupied floor will be less than 75 feet, such that the building is not required to be designed as a high-rise per CBC Section 403. The building will be sprinkler protected throughout.

Code Section: 2019 California Fire Code (CFC) Section 503.1.1.

Code Requirement: CFC Section 503.1.1 requires that fire apparatus access roads be provided around building sites that so that all portions of the first story of buildings are located within 150 feet of fire apparatus access roads. The exception to Section 503.1.1 permits this distance to be increased where approved by the fire code official in sprinkler protected buildings where necessitated by site conditions.

Code Intent: CFC Section 503.1.1 requires fire apparatus access roads within 150 feet of the exterior walls of buildings to allow for fire department operations, and to limit the maximum length of hose needed to reach any point along the exterior of a building.

Request: The proposed building is located on a congested site. The east side of the building fronts onto Lorton Avenue, and the west side of the building fronts onto Park Road. The building is located adjacent to the property line on the south side of the site,

adjacent to existing buildings and parking areas on the adjacent site. The north side of the building fronts onto an existing parking area that extends between Lorton Avenue and Park Road. This parking area may be converted to a public plaza space with no vehicular paths in the future, such that it may not include fire apparatus access roads in the future. This will result in portions of the north and south facades being located more than 150 feet from the fire apparatus access roads. The design proposes to increase the distance between the north and south exterior walls to fire apparatus access roads to up to 200 feet, based on these proposed construction and protection features:

1. The building will be of Type I-B construction and will be constructed of 2-hour fire-resistive rated structural frame and bearing walls and 2-hour rated floors. The construction will be non-combustible throughout.
2. The building will be sprinkler protected throughout.
3. The entry doors into the exit stairs serving the above and below grade buildings and the interior areas on the first floor will be located less than 150 feet from a fire apparatus access road.
4. The south wall is located less than 3 feet from the property line, and will consist of a 1-hour rated wall with no openings to separate the interior of the 220 Park Road building from the adjacent properties.
5. The new building will include a minimum 96 square foot fire command center adjacent to the office lobby space on the west side of the project site, to provide a central fire department response point. The room will be enclosed in 2-hour fire barriers. The fire command center will house the fire alarm panel, the control and monitoring panel for the emergency responder radio communication system, two-way communication equipment, an annunciator panel indicating the location of the elevators, and status indicators for fire protection and firefighting related equipment (including a fire pump if provided).
6. The design includes three exit stairs serving each above grade story. The code requires one stair to the unoccupied roof level. The design proposes to extend two stairs to the

roof level, with the roof access provided through a penthouse directly from the 2-hour rated stair enclosures.

Justification:

The site configuration allows for fire department access along the east and west sides of the building. However, the building is located adjacent to the property line on the south side of the site, and the future redevelopment of existing parking into a potential plaza on the north side of the development may limit the fire department access in this area, such that the design proposes to increase the distance between the exterior walls and the fire apparatus access roads up to 200 feet as permitted by exception to Section 503.1.1. The entry doors into the building and the exit stair enclosures will be located in the portions of the exterior walls that are within 150 feet of the fire apparatus access roads. This is illustrated on the attached ground floor plan.

The building will be of non-combustible, fire-resistive rated construction. The exterior walls are non-combustible, and the south exterior wall is 1-hour rated with no openings. At the upper levels, the design may include glazed openings for some of the wall, but will include a 1-hour rated wall immediately to the interior side of the openings along the south façade. This will limit the potential exposure hazard along this façade, protecting the adjacent buildings from a fire in the 220 Park Road building and protecting the new building from a potential fire on the adjacent buildings. The non-combustible construction and sprinkler protection provided will limit the potential fire hazard associated with the north façade.

The building will include additional protective features to facilitate fire department access to the above and below grade building interior. The entry doors to the first floor spaces and exit stairs are located within 150 feet of the fire apparatus access roads. The design includes a dedicated fire command center that can be accessed from the exterior on the west side of the building. The fire command center is located adjacent to the main entry lobby space. This is illustrated on the attached ground floor plan. This provides a main response point for the building, which will house the fire protection related control and monitoring equipment. The fire command center will be enclosed in 2-hour rated fire barriers to match the survivability requirements for the monitoring equipment included therein.



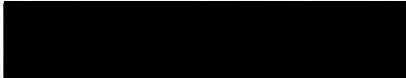
The design includes three exit stairs. To facilitate access to the building roof in an emergency, two of the stairs will extend up to the roof, with full 44-inch wide stair paths leading to penthouse elements with doors to the roof. The design will include standpipe outlets within the stair enclosures at the uppermost landing at the roof level. The stairs to the roof include the southeast stair exiting directly to Lorton Avenue and the southwest stair located off of the main lobby area on the Park Road side of the project. This stair discharges through the lobby space near the proposed fire command center, providing a clear route to all levels and the roof from the proposed main fire department response location. The doors to the stairs leading to the roof level are located less than 150 feet from fire apparatus access roads.

Conclusion:

This alternate means of protection request outlines a proposed approach to provide alternate fire apparatus access to the new mid-rise office and parking garage building at 220 Park. The design limits the distance to the building openings to the limits outlined in CBC Section 503.1.1, and includes additional protective features to facilitate fire department operations within the structure.

Prepared by:

THE FIRE CONSULTANTS, INC

  
Brian Gagnon, P.E.

June 24, 2020  
Date

BDG/JRS:bg

12-1568/220 Park/RQ 220 Park Road FD Access\_Rev2

220 PARK ROAD  
SARES REGIS



220 PARK - BURLINGAME, LLC  
220 PARK ROAD  
BURLINGAME, CA



123 BIRMINGHAM, SUITE 100  
1411 38TH AVE  
REDWOOD CITY, CA 94063  
WWW.BIONICDESIGN.COM

NO. DATE DESCRIPTION  
1 REG-2008 05-17-2008 PLANNING SUBMITTAL  
2 REG-2008 05-17-2008 PLANNING SUBMITTAL

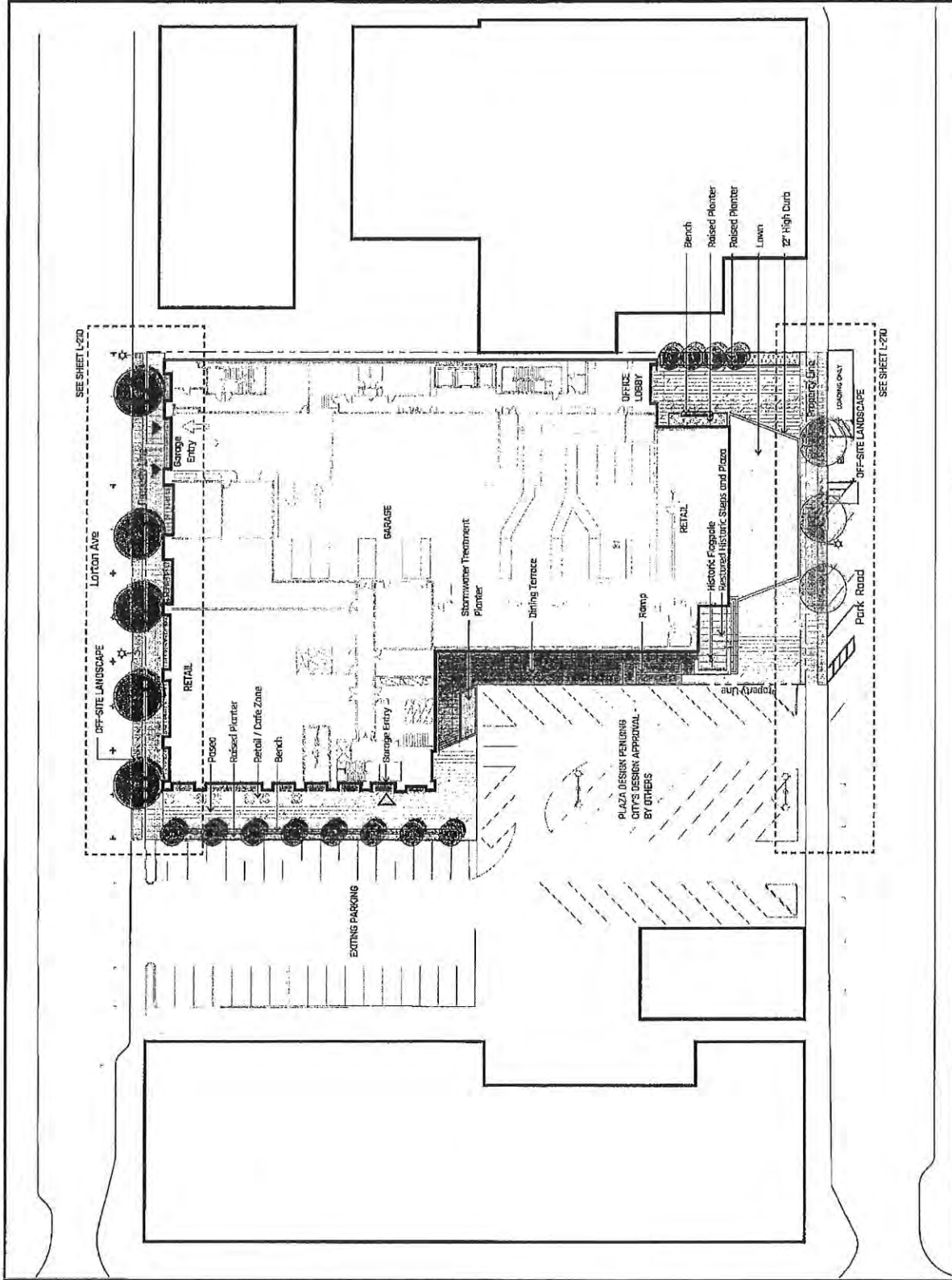
PROJECT NUMBER  
1001

SHEET TITLE  
ILLUSTRATIVE SITE PLAN

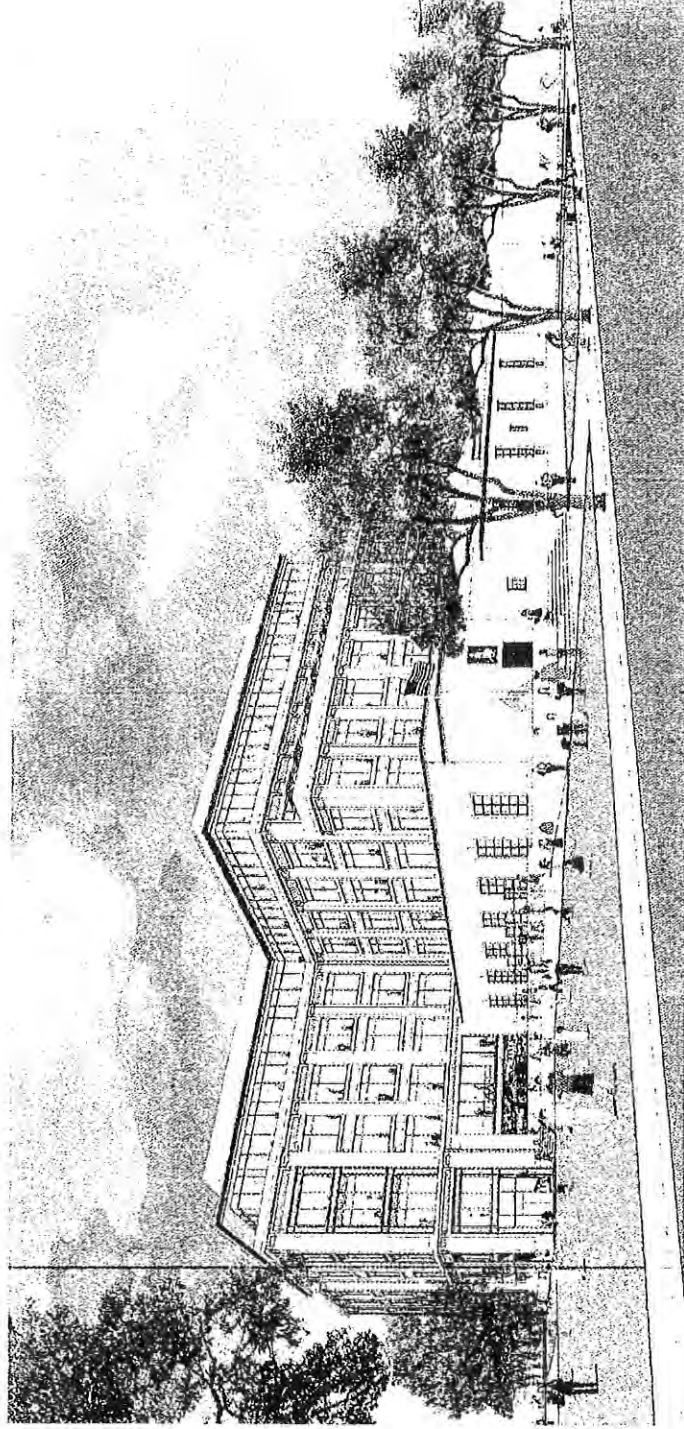
SCALE  
1" = 20'



SHEET NUMBER  
L-201



# 220 PARK ROAD BURLINGAME, CA



## PLANNING RESUBMITTAL 06.22.2020

### PROJECT TEAM:

**APPLICANT**  
220 PARK - BURLINGAME, LLC  
220 PARK ROAD  
220 PARK ROAD, SUITE 700  
BURLINGAME, CA 94010  
PHONE: 650.377.6938

**DAVE HOPKINS:** dhopkins@220park.com  
**CHRIS JONES:** cjones@220park.com  
**MOLLY KIDDER:** mkidder@220park.com  
**ALEX UVADAS:** uvadas@220park.com

**ARCHITECT**  
KORTI SUNSERI HAGEY ARCHITECTS  
349 SUTTER STREET  
SAN FRANCISCO, CA 94108  
PHONE: 415.864.1890

**TED KORTI:** tedk@kshai.com  
**ARISTA JUSUP:** ajusup@kshai.com

**LANDSCAPE ARCHITECT**  
BIONIC LANDSCAPE  
833 MARKET STREET, SUITE 601  
SAN FRANCISCO, CA 94102  
PHONE: 415.261.6646

**MARCEL WILSON:** mwilson@bionicklandscaps.com  
**ARI DAMIAN:** adamian@bionicklandscaps.com

**CIVIL ENGINEER**  
BKF ENGINEERS  
255 SHORELINE DRIVE, SUITE 210  
SAN FRANCISCO, CA 94133  
PHONE: 554.459492

**JASON WAINFIELD:** jwainfield@bmf.com

### SHEET INDEX:

A1.1	EXISTING SITE PHOTOS	L-001	FRAMEWORK PLAN
A1.2	WATERCOLOR RENDERING	L-210	STRUCTURE SITE PLAN
A1.3	WATERCOLOR RENDERING	L-401	STREETCROSSING LAYOUT AND MATERIALS
A1.4	WATERCOLOR RENDERING	L-601	PLANTING PLAN
A1.5	WATERCOLOR RENDERING		MATERIAL
A1.6	EXISTING PROPOSED ACCESSIBILITY DETAILS	A2.01	EXISTING FLOOR PLAN
A1.7	EXISTING PROPOSED ACCESSIBILITY DETAILS	A2.02	DECK FLOOR PLAN
A1.8	ELEVATOR ACCESSIBILITY	A2.03	BELOW GRADE PARKING LEVEL 2
A1.9	PARKING DETAILS	A2.04	BELOW GRADE PARKING LEVEL 1
A1.10	PARKING DETAILS	A2.05	BELOW GRADE PARKING LEVEL 2
A1.11	EXITING DIAGRAMS	A2.06	SECOND FLOOR PLAN
A1.12	PLUMBING CALCULATIONS	A2.07	THIRD FLOOR PLAN
A1.13	AMMR	A2.08	FOURTH FLOOR PLAN
A1.14	EXISTING SITE PLAN	A2.09	FIFTH FLOOR PLAN
A1.15	PROPOSED SITE PLAN	A2.10	SIXTH FLOOR PLAN
A1.16	PROJECT INFO	A2.11	ROOF PLAN
A1.17	SITE ACCESSIBILITY PLAN	A3.0	EXISTING ELEVATIONS
A1.18	TOPOGRAPHIC SURVEY	A3.1	PROPOSED ELEVATIONS
A1.19	GRADING PLAN	A3.2	PROPOSED SECTIONS
A1.20	UTILITY PLAN	A3.3	PROPOSED SECTIONS
A1.21	STORMWATER MANAGEMENT PLAN	A3.4	PROPOSED SECTIONS



## Project Comments – Planning Application

Project Address: 220 Park Road, zoned HMU, APN: 029-204-250

Description: Request for Application for Environmental Review, Commercial Design Review, Variance for Height (Title 21-historic), and Variance for reduction to parking requirement for the restoration of portions of the historic post office building and the construction of a new 6-story (approx.. 102') building with 11,915 SF of retail uses on the ground floor, and 140,000 SF of office on the floors above with 280 on-site parking spaces located in two levels of below grade parking, with parking to be shared/available for public use on evenings and weekends..

From: Martin Quan  
Public Works Engineering

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**Please address the following comments at this time; provide a written response and revised plans with your resubmittal:**

- ~~1. On the utility plan, please show how the adjacent sidewalk outside the project limits will integrate with the proposed sidewalk alignment and widths.~~
2. Please be aware that all proposed nonstandard sidewalk pavers within the public right-of-way will require a maintenance agreement with the property owner for any future repairs.
- ~~3. Please redesign the projects storm drain pipes to discharge from within the property limits to either Lorton Avenue or Park Road. Project utilities are not allowed to cross property lines.~~
- ~~4. Please remove all proposed trees within the storm drain easement.~~
5. Please explain the legal and construction process to construct the subsurface garage over property lines. Will the City maintain ownership of the land or lease/sell a portion of the lot to the developer.
- ~~6. Please number all parking spaces and dimension the drive aisles.~~
- ~~7. For the below grade parking level 1 and 2 plansheets, please dimension and show the storm drain pit limits (Park Road Pits) with respect to the edge of the dashed line and wall for the subsurface garage.~~
8. Please be aware that shoring construction of the subsurface garage walls along the storm drain easement will have to be constructed with internal bracing, no construction tie-backs will be permitted.
- ~~9. Please label the refuse/recycling area/room for the project. Please be aware that Recology must be able to retrieve bins/carts from within the project site. No staging of bins/carts in the right-of-way.~~
- ~~10. If the plaza design is not part of this project, please show what screening will be proposed between the public parking lot and the project site.~~
- ~~11. Please show the location of the transformer for the project.~~

The following comments do not need to be addressed now, but you should be aware of them as they will need to be addressed at time of building permit submittal.

1. Comments will be forthcoming after review/comments are provided by the Planning and/or Council.

Reviewed By: Martin Quan  
650-558-7245

Date: 6/29/2020



## Project Comments – Planning Application

Project Address: 220 Park Road, zoned HMU, APN: 029-204-250

Description: Request for Application for Environmental Review, Commercial Design Review, Variance for Height (Title 21-historic), and Variance for reduction to parking requirement for the restoration of portions of the historic post office building and the construction of a new 6-story (approx.. 102') building with 11,915 SF of retail uses on the ground floor, and 140,000 SF of office on the floors above with 280 on-site parking spaces located in two levels of below grade parking, with parking to be shared/available for public use on evenings and weekends..

From: Rick Caro III  
Building Division

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Please address the following comments at this time; provide a written response and revised plans with your resubmittal:

- 8) On your plans **provide a table** that includes the following:
- a. ~~Occupancy group for each area of the building~~
  - b. ~~Type of construction~~
  - c. ~~Allowable area~~
  - d. ~~Proposed area~~
  - e. ~~Allowable height~~
  - f. ~~Proposed height~~
  - g. ~~Proposed fire separation distances~~
  - h. ~~Exterior wall and opening protection~~
    - i. ~~Allowable~~
    - ii. ~~Proposed~~
  - i. ~~Indicate sprinklered or non-sprinklered~~

**NOTE: A written response to the items noted here and plans that specifically address items 8 must be re-submitted before this project can move forward for Planning Commission action. The written response must include clear direction regarding where the requested information can be found on the plans.**

**The following comments do not need to be addressed now, but you should be aware of them as they will need to be addressed at time of building permit submittal.**

- 33) Provide two completed copies of the *Mandatory Measures* with the submittal of your plans for Building Code compliance plan check. In addition, replicate this completed document on the plans. Note: On the Checklist you must provide a reference that indicates the page of the plans on which each Measure can be found. BMC 18.30.040, 18.30.045 & 18.30.050
- 34) Include with your Building Division plan check submittal a complete underground fire sprinkler plan. Contact the Burlingame Water Division at 650-558-7660 for details regarding the water system or Central County Fire for sprinkler details.
- 35) Sewer connection fees must be paid prior to issuing the building permit.

**Reviewed By:** Rick Caro III  
650 558-7270

**Date:** April 17, 2020



## *Project Comments – Planning Application*

Project Address: 220 Park Road, zoned HMU, APN: 029-204-250

Description: Request for Application for Environmental Review, Commercial Design Review, Variance for Height (Title 21-historic), and Variance for reduction to parking requirement for the restoration of portions of the historic post office building and the construction of a new 6-story (approx.. 102') building with 11,915 SF of retail uses on the ground floor, and 140,000 SF of office on the floors above with 280 on-site parking spaces located in two levels of below grade parking, with parking to be shared/available for public use on evenings and weekends..

From: Bob Disco  
Park Division

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**Please address the following comments at this time; provide a written response and revised plans with your resubmittal:**

The following comments do not need to be addressed now, but you should be aware of them as they will need to be addressed at time of building permit submittal.

1. Submit WELO and Irrigation Plan for building permit.

**Reviewed By:** BD  
650.558.7333

**Date:** 7.7.2020

*Landscape ok  
Tree wells ok  
Protected Tree Removal Permit will be applied for through Parks Div.*



## *Project Comments – Planning Application*

Project Address: 220 Park Road, zoned HMU, APN: 029-204-250

Description: Request for Application for Environmental Review, Commercial Design Review, Variance for Height (Title 21-historic), and Variance for reduction to parking requirement for the restoration of portions of the historic post office building and the construction of a new 6-story (approx.. 102') building with 11,915 SF of retail uses on the ground floor, and 140,000 SF of office on the floors above with 280 on-site parking spaces located in two levels of below grade parking, with parking to be shared/available for public use on evenings and weekends..

From: Jennifer Lee  
Stormwater

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Please address the following comments at this time; provide a written response and revised plans with your resubmittal:

No comments at this time.

The following comments do not need to be addressed now, but you should be aware of them as they will need to be addressed at time of building permit submittal.

1. Please complete, sign and return the "C.3/C.6 Development Review Checklist", which is available at [www.burlingame.org/stormwaterdevelopment](http://www.burlingame.org/stormwaterdevelopment). For additional information, please see the **C.3 Regulated Projects Guide** (February 2020) at [www.flowstobay.org/newdevelopment](http://www.flowstobay.org/newdevelopment).
2. Per the Municipal Stormwater Permit, projects on lands greater than 10,000 sf that are plumbed directly to the City's storm drain system must be equipped with full trash capture systems or are managed with trash discharge control actions equivalent to or better than full trash capture systems. Please show how you are complying with this requirement on the plans.
3. Starting June 5, 2019 all projects that involve demolition of a building will need to ensure that polychlorinated biphenyls do not enter the storm drains per Municipal Code 15.15 Managing PCBs during Building Demolition Ordinance. Project applicants must complete, sign, and return the PCBs Screening Assessment Form before issuance of the building permit, the form is available at [www.burlingame.org/stormwaterdevelopment](http://www.burlingame.org/stormwaterdevelopment). For assistance with completing the form, please review the PCBs in Priority Building Materials Applicant Package, which is also available at the website referenced above.
4. Please ensure that all stormwater treatment areas outlined in the civil plans are also shown consistently on the landscape plans.
5. The building permit application plans shall show the marking of the words "No Dumping! Flows to Bay" or equivalent on all storm drain inlets surrounding and within the project site consistent with the San Mateo Countywide Water Pollution Prevention Program's C.3 Technical Guidance.



6. Trash storage areas (including recyclables and compostables or similar areas), wash areas, loading docks, repair/maintenance bays, and equipment or material storage areas shall be completely covered and bermed to ensure that no stormwater enters the covered area. Covered areas shall be graded so that spills and washwater flow to area drains connected to the sanitary sewer system, subject to the local sanitary sewer agency's authority and standards.
7. Interior level parking garage floor drains, and any other interior floor drains, shall be connected to the sanitary sewer system.
8. Fire sprinkler test water shall discharge to onsite vegetated areas, or alternatively shall be discharged to the sanitary sewer system.
9. Boiler drain lines, roof top equipment with drain lines, and/or equipment for washing and/or steam cleaning activities shall be connected to the sanitary sewer system.
10. Air conditioning condensate shall drain to landscaping, or alternatively may be connected to the sanitary sewer system.
11. Any construction project in the City, regardless of size, shall comply with the city's stormwater NPDES permit to prevent stormwater pollution from construction-related activities. Project proponents shall ensure that all contractors implement appropriate and effective Best Management Practices (BMPs) during all phases of construction, including demolition. **When submitting plans for a building permit**, please include the **Construction BMP plan sheet**. An electronic file is available at: [www.burlingame.org/stormwaterdevelopment](http://www.burlingame.org/stormwaterdevelopment).
12. Post-construction treatment measures must be designed, installed, and hydraulically-sized to treat a specified amount of runoff. The project plan submittals shall identify the owner and maintenance party responsible for the ongoing inspection and maintenance of the post-construction stormwater treatment measures in perpetuity. A completed, notarized Stormwater Treatment Measure Maintenance Agreement must be submitted to the City prior to the issuance of a final construction inspection.
13. Since the project will disturb one (1) or more acres of soil, the project must obtain coverage under the Construction General Permit from the State Water Resources Control Board. When submitting plans for a building permit, please include the following:
  - a. A copy of the **Notice of Intent (NOI) for Construction General Permit** coverage and
  - b. A copy of the **Stormwater Pollution Prevention Plan (SWPPP)** prepared by a certified Qualified SWPPP Developer (QSD).

**Reviewed By:** Jennifer Lee  
650-558-7381

**Date:** 4/13/2020



## ***Project Comments – Planning Application***

Project Address: 220 Park Road, zoned HMU, APN: 029-204-250

Description: Request for Application for Environmental Review, Commercial Design Review, Variance for Height (Title 21-historic), and Variance for reduction to parking requirement for the restoration of portions of the historic post office building and the construction of a new 6-story (approx.. 102') building with 11,915 SF of retail uses on the ground floor, and 140,000 SF of office on the floors above with 280 on-site parking spaces located in two levels of below grade parking, with parking to be shared/available for public use on evenings and weekends..

From: Christine Reed  
Fire Dept.

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**Please address the following comments at this time; provide a written response and revised plans with your resubmittal:**

1. Please detail the type of building construction. Additional requirements may apply depending on construction type.
2. As this is a Park Rd. address, the fire department connection needs to be facing this street front and it cannot be inside of the building. It may recessed into the exterior wall per City of Burlingame standard.
3. Fire department access is not provided around entire building. Provide access or submit an Alternate Means of Protection request application with proposed mitigation measures in lieu of fire access.
4. Exit paths from interior stairwells to exit discharge must be within 2-hour rated exit enclosures.
5. Confirm from which street the height of the building is measured. Must be measured from the lowest point of fire department access.
6. Per BMC 18.16.020, building's main electrical shut off is required at an exterior location or provide a shunt trip at the exterior.

**The following comments do not need to be addressed now, but you should be aware of them as they will need to be addressed at time of building permit submittal.**

1. The building shall be equipped with an approved NFPA 13 sprinkler system throughout. Sprinkler drawings shall be submitted and approved by the Central County Fire Department prior to installation.
2. The fire sprinkler system shall be electronically monitored by an approved central receiving station.
3. The applicant shall ensure proper drainage in accordance with the City of Burlingame Engineering Standards is available for the fire sprinkler main drain and inspector test on the building plumbing drawings. These items may drain directly to landscape or in the sewer with an air gap.

4. The fire protection underground water line shall be submitted and approved through the Burlingame Building Department prior to approval of aboveground fire sprinkler permit.
5. The building shall be equipped with an approved Class I NFPA 14 Standpipe System. The standpipe system shall be submitted and approved by the Central County Fire Department prior to installation. The system shall be installed and operable prior to construction of the fourth story of the structure.
6. Phase I & II elevator recall for firefighter emergency operation required.
7. Elevator shunt trip (causing loss of power) is not allowed. Sprinkler head at top of elevator shaft and in machine room not allowed. Elevator machine room must be constructed of the same rating as the elevator shaft.
8. Roof screen shall have at least 2 access doors, one near Lorton and one near Park Rd.

**Reviewed By: Christine Reed**  
650-558-7617

**Date: 5-5-20**

*220 Park Road – Staff Report Attachments*

**Planning Commission Resolution (Proposed)**

**RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF BURLINGAME  
APPROVING AN APPLICATION FOR ENVIRONMENTAL REVIEW, COMMERCIAL DESIGN  
REVIEW, HISTORIC VARIANCES FOR HEIGHT (TITLE 21) AND PARKING, AND A  
PARKING EASEMENT (BELOW GRADE UNDER LOT E) FOR THE REDEVELOPMENT AND  
RESTORATION OF PORTIONS OF THE EXISTING POST OFFICE BUILDING AND  
CONSTRUCTION OF A NEW 6-STORY OFFICE PROJECT WITH GROUND FLOOR RETAIL  
AND TWO LEVELS OF UNDERGROUND PARKING AT 220 PARK ROAD.**

WHEREAS, on April 9, 2020, 220 Park – Burlingame, LLC (Sares Regis / Dostart Development Company) on behalf of the property owner, Burlingame Park Square LLC, filed an application with the City of Burlingame Community Development Department – Planning Division requesting approval of the following requests:

- Environmental Review (CEQA Section 15183);
- Commercial Design Review for a new, six-story mixed use office building (retail and office) (Code Sections 25.57.010 (c) and 25.33.020);
- Historic Variance (Title 21) for Building Height, 98'-6" proposed where 55' is the maximum allowed (Code Section 21.04.120 (a)(3)(B)(i));
- Historic Variance (Title 21) for Parking for 187 parking spaces; 280 on-site parking spaces provided (1:500 SF ratio for office) where 467 parking spaces are required (1:300 SF ratio for office) (Code Section 21.04.120 (a)(3)(B)(i)); and
- Parking Easement (below grade under Lot E) for encroachment beyond property line on City Parking Lot E

WHEREAS, on July 13, 2020 the Planning Commission conducted a duly noticed public hearing (design review study) to review the proposed project. At that time direction was provided to the applicant regarding minor design modifications; and

Following consideration of all information contained in the November 23, 2020 staff report to the Planning Commission regarding the project, all written correspondence, and all public comments received at the public hearing, the Planning Commission grants approval for the redevelopment and restoration of portions of the existing Post Office building and construction of a New 6-story Office Project with Ground Floor Retail and two levels of Underground Parking based on the following findings regarding the project entitlements:

Design Review Findings:

- that the proposal consisting of a variety of materials such as cast stone panels, brick veneer, stone concrete trim with a painted aluminum canopy and vision glass window wall system, in a contemporary style that would differentiate the new construction from the historic portion of the Post Office that is being retained will complement the downtown urban fabric and is consistent with the pattern of diverse architectural styles that characterize the city's commercial areas;
- that the proposed storefront, consisting primarily of an aluminum and glass system recessed at various points along the building façade and a metal canopy at the main entry to the building, and concealing the parking garage by locating it below grade and placing the vehicle entry to

the garage at the rear of the building, promotes pedestrian activity by allowing views directly into the retail business; that the proposed project respects the promotion of pedestrian activity by placement of buildings to maximize commercial use of the street frontage with the creation of new retail and restaurant uses that would be located adjacent to the newly expanded sidewalk on Lorton Avenue and would provide a direct interface with pedestrians; the design provides off-street public spaces with a promenade that would provide public space from Park Road directly through to Lorton Avenue (independent of the proposed town square); and the parking would not dominate street frontages as it would be located below grade and would also be available for public use in the evenings and on weekends;

- that the subject property is a center piece of the downtown area and is visually prominent, and while it would be significantly over the 55-foot height limit, at 98'-6", the design fits the site and is compatible with the surrounding development in that the architecture steps back and pays homage to the Post Office with a variety of terraces and stacked volume that work to respect the surrounding subordinate structures, in addition the proposed building is consistent with the architectural style and mass and bulk with other structures by using a variety of materials including precast concrete, brick veneer, ceramic tile and painted aluminum;
- that the site features such as landscaping, with five new street trees along Lorton Avenue and three new street trees along Park Road, as well as pedestrian circulation that will be provided with a through promenade from Park Road to Lorton Avenue will enrich the existing opportunities of the commercial neighborhood; and
- that the proposal is consistent with the design guidelines established in Chapter 5 of the Downtown Specific Plan (Design & Character).

#### Historic Variance Findings:

##### Title 21 - For Parking

- That the parking reduction is appropriate to account for the obstacle of building around a historic building (Post Office); that the site is constrained by the required preservation of portions of the historic building under the Preservation Covenant as well as the underground box culvert that passes through the property, which diminish the ability to construct parking at grade given the dimensional constraints with the retention of the building and the code required aisle and parking space dimensions, therefore the granting of the Parking Variance is necessary for the preservation and enjoyment of a substantial property right and to prevent unreasonable property loss or unnecessary hardship; that the granting of the Parking Variance will not be detrimental or injurious to property or improvements in the vicinity and will not be detrimental to the public health, safety, general welfare or convenience because the proposed ratio of 1 parking space per 500 square feet is appropriate given the location of the project in a downtown area near services and high quality public transit and the project includes a TDM plan to support alternative modes of transportation. For these reasons, the proposed project may be found to be compatible with the Variance criteria.

##### Title 21 – For Height

- That since the proposal meets the Goals and Policies of the Downtown Specific Plan to guide growth and development in Downtown Burlingame, the use will be in compliance with the General Plan for the area; and that conditions of approval have been suggested for consideration to assure that the proposal is compatible with the aesthetics, mass, bulk and character of existing and potential uses on adjoining properties in the general vicinity; that the

physical location of the historic Post Office building along with the underground box culvert that passes through the property precludes portions of the property from being built upon and therefore is tantamount to exceptional or extraordinary circumstances or conditions applicable to the subject property involved that does not apply generally to other properties in the same district and therefore justifies the requested Height Variance of 43'-6" over the 55'-0" height limit with an overall height of 98'-6"; that an equivalent property in the HMU District could support the code complying construction of an approximately 220,000 SF building based on the applicant's example scenario therefore, the additional height requested, 43'-6" to allow a maximum height of 98'-6" where 55' is the maximum in the HMU District is necessary for the preservation and enjoyment of a substantial property right of the applicant, and to prevent unreasonable property loss or unnecessary hardship. For these reasons, the proposed project may be found to be compatible with the Variance criteria.

WHEREAS, said matters were heard by the Planning Commission of the City of Burlingame on November 23, 2020, at which time it reviewed and considered the staff report and all other written materials and testimony presented at said hearing;

NOW, THEREFORE, IT IS RESOLVED AND DETERMINED BY THIS PLANNING COMMISSION THAT:

Section 1. On the basis of the documents submitted and reviewed, and comments received and addressed by this Commission, it is hereby found that there is no substantial evidence that the project set forth above will have a significant effect on the environment, per CEQA Section 15183, Consistency with the General Plan and Downtown Specific Plan, is hereby approved.

Section 2. Said Commercial Design Review, Historic Variances and Parking Easement are approved subject to the conditions set forth in Exhibit "A" attached hereto. Findings for such Commercial Design Review, Historic Variances and Parking Easement are set forth in the staff report, minutes, and recording of said meeting.

Section 3. It is further directed that a certified copy of this resolution be recorded in the official records of the County of San Mateo.

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Chairman

I, \_\_\_\_\_, Secretary of the Planning Commission of the City of Burlingame, do hereby certify that the foregoing resolution was introduced and adopted at a regular meeting of the Planning Commission held on the 23<sup>rd</sup> day of November, 2020, by the following vote:

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Secretary

## EXHIBIT "A"

Conditions of Approval for Environmental Review, Commercial Design Review, Historic Variances, and Parking Easement.

**220 Park Road**

Effective December 3, 2020

Page 1

1. that the project shall be built as shown on the plans submitted to the Planning Division date stamped October 16, 2020, sheets A0.1 through A3.5, sheets I-001 through I-601, sheets C1.00 through C4.00;
2. that prior to issuance of a building permit for construction of the project, the project construction plans shall be modified to include a cover sheet listing all conditions of approval adopted by the City Council; which shall remain a part of all sets of approved plans throughout the construction process. Compliance with all conditions of approval is required; the conditions of approval shall not be modified or changed without the approval of the Planning Commission, or City Council on appeal;
3. that any changes to the size or envelope of the building, which would include expanding the footprint or floor area of the structure, replacing or relocating windows or changing the roof height or pitch, shall be subject to Planning Commission review (FYI or amendment to be determined by Planning staff);
4. that the project shall include the Transportation Demand Management Measures as proposed in the Transportation Demand Management (TDM) Plan, prepared by Fehr & Peers, dated November 5, 2020;
5. that a TDM annual report shall be prepared by a qualified professional and submitted to the City of Burlingame annually; with the initial, or baseline, commute survey report to be conducted and submitted one (1) year after the granting of a certificate of occupancy for 75 percent or more of the project and annually after that;
6. that the TDM annual report shall provide information about the level of alternative mode-uses and in the event a 20 percent reduction in trip generation compared to the standard rate estimated by the Institute of Transportation Engineers (ITE) Trip Generation Manual (10<sup>th</sup> Edition) is not achieved, the report shall explain how and why the goal has not been reached; in such a circumstance the annual report shall identify a work plan, to be approved by the City of Burlingame, which describes additional or alternative measures for implementation that would be necessary to enhance the TDM program to attain the TDM goal of 20 percent reduction in trip generation;
7. that the City may consider whether the employer/tenant has made a good faith effort to meet the TDM goals and may allow the owner a six-month "grace period" to implement additional TDM measures to achieve the 20 percent vehicle trip reduction;
8. that prior to the issuance of building permits, a covenant agreement shall be recorded office with the San Mateo County Assessor and Recorder's Office to provide constructive notice to all future owners of the property of any ongoing programmatic requirements that discloses the required Transportation Demand Management (TDM) provisions and any conditions of approval related herein to compliance and reporting for the TDM;
9. that prior to issuance of a building permit for the project, the project applicant shall pay in full the commercial linkage fee estimated to be \$3,449,408.00, as of the entitlement



## EXHIBIT "A"

Conditions of Approval for Environmental Review, Commercial Design Review, Historic Variances and Parking Easement.

**220 Park Road**

Effective December 3, 2020

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approval hearing on November 23, 2020; however this fee shall be calculated based on the fee schedule in effect at the time the building permit is issued and therefore may change from the above estimated depending upon when the building permit is issued;

10. that prior to final inspection or the date the certificate of occupancy is issued, whichever occurs first, the project applicant shall pay the Public Impact Fees in the amount of \$ 1,415,974.00 in full, payable to the City of Burlingame and submitted to the Planning Division;
11. that the conditions of the Building Division's April 17, 2020 memo, the Stormwater Division's April 13, 2020 memo, the Park's Division's April 21, 2020 and July 7, 2020 memos, Fire Division's May 5, 2020 and August 11, 2020 memos and the Public-Works Engineering Division's April 23, 2020 and June 29, 2020 memos related to the building permit submittal shall be met;
12. that the project shall be constructed in accordance with the July 14, 2020 "Request for Alternate Materials or Methods of Construction" agreement between the applicant (The Fire Consultants Inc. Brian Gagnon, PE for Andrew Turco, Sares Regis or any future owner) and Central County Fire Department which requires the following:
  - a. The fire sprinkler system shall be equipped with quick response sprinkler heads throughout the garage levels;
  - b. The fire command center shall be a minimum of 144 square feet, with a minimum dimensions of 10 feet;
  - c. Standpipe outlets shall be located immediately outside the stairwell doors on the roof level. All other standpipe outlets shall be located at the intermediate stairwell landing within each stairwell.
13. that a 15-foot long painted red curb should be provided adjacent to the project driveway on Lorton Avenue to comply with Caltrans sight distance requirements. Appropriate visible warning signs and audible warning signals should also be provided at the parking garage entrance to alert pedestrians and bicyclists of vehicles exiting the garage;
14. that during construction, the applicant shall provide fencing (with a fabric screen or mesh) around the project site to ensure that all construction equipment, materials and debris is kept on site;
15. that storage of construction materials and equipment on the street or in the public right-of-way shall be prohibited except for portions of the historic Post Office structure that would be temporarily stored as explicitly outlined in the development agreement, which would allow the Post Office building to be temporarily relocated outside of the footprint of the to-be-constructed parking garage to the adjacent site (Lot E) to the northwest and to a portion of the adjacent Park Road right-of-way to the southeast; the preserved portions of the building would then be returned to their historic location and orientation following

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completion of the underground parking garage and grade-equivalent concrete deck above the underground parking;

16. that the applicant shall prepare a construction staging and traffic control plan for the duration of construction for review and acceptance by the City Engineer prior to the issuance of a building permit; the construction staging plan shall include construction equipment parking, construction employee parking, timing and duration of various phases of construction and construction operations hours; the staging plan shall address public safety and shall ensure that worker's vehicles and construction equipment shall not be parked in public parking areas with exceptions for construction parking along the street frontages of the project site;
17. that the project applicant and its construction contractor(s) shall develop a construction management plan for review and approval by the City of Burlingame. The plan must include at least the following items and requirements to reduce, to the maximum extent feasible, traffic and parking congestion during construction:
  - a. A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes;
  - b. Identification of haul routes for movement of construction vehicles that would minimize impacts on motor vehicular, bicycle and pedestrian traffic, circulation and safety, and specifically to minimize impacts to the greatest extent possible on streets in the project area;
  - c. Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures would occur;
  - d. Provisions for monitoring surface streets used for haul routes so that any damage and debris attributable to the haul trucks can be identified and corrected by the project applicant; and
  - e. Designation of a readily available contact person for construction activities who would be responsible for responding to any local complaints regarding traffic or parking. This coordinator would determine the cause of the complaint and, where necessary, would implement reasonable measures to correct the problem.
18. that if construction is done during the wet season (October 1 through April 30), that prior to October 1 the developer shall implement a winterization program to minimize the potential for erosion and polluted runoff by inspecting, maintaining and cleaning all soil erosion and sediment control prior to, during, and immediately after each storm event; stabilizing disturbed soils throughout temporary or permanent seeding, mulching matting, or tarping; rocking unpaved vehicle access to limit dispersion of mud onto public right-of-way; covering/tarping stored construction materials, fuels and other chemicals;
19. that trash enclosures and dumpster areas shall be covered and protected from roof and surface drainage and that if water cannot be diverted from these areas, a self-contained drainage system shall be provided that discharges to an interceptor;

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20. that this project shall comply with the state-mandated water conservation program, and a complete Irrigation Water Management and Conservation Plan together with complete landscape and irrigation plans shall be provided at the time of building permit application;
21. that all site catch basins and drainage inlets flowing to the bay shall be stenciled. All catch basins shall be protected during construction to prevent debris from entering;
22. that this proposal shall comply with all the requirements of the Tree Protection and Reforestation Ordinance adopted by the City of Burlingame in 1993 and enforced by the Parks Department; complete landscape and irrigation plans shall be submitted at the time of building permit application and the street trees will be protected during construction as required by the City Arborist;
23. that project approvals shall be conditioned upon installation of an emergency generator to power the sump pump system; and the sump pump shall be redundant in all mechanical and electrical aspects (i.e., dual pumps, controls, level sensors, etc.). Emergency generators shall be housed so that they meet the City's noise requirement;
24. that the project sponsor shall coordinate improvements to the existing sanitary sewer infrastructure with the City Engineer, as required by SCA-21, and upgrade approximately 200 linear feet of the sewer line in Lorton Avenue from a 6-inch vitrified clay pipe to an 8-inch high-density polyethylene pipe;
25. that a Protected Tree Removal Permit shall be required from the City of Burlingame Parks Division to remove any existing protected size trees on the subject property and that the project shall comply with the Tree Protection and Reforestation Ordinance adopted by the City of Burlingame and enforced by the Parks Department; complete landscape and irrigation plans shall be submitted at the time of building permit application and the street trees will be protected during construction as required by the City Arborist;
26. that the project shall comply with the Construction and Demolition Debris Recycling Ordinance which requires affected demolition, new construction and alteration projects to submit a Waste Reduction plan and meet recycling requirements; any partial or full demolition of a structure, interior or exterior, shall require a demolition permit;
27. that demolition or removal of the existing structures and any grading or earth moving on the site shall not occur until a building permit has been issued and such site work shall be required to comply with all the regulations of the Bay Area Air Quality Management District;
28. that the applicant shall comply with Ordinance 1503, the City of Burlingame Storm Water Management and Discharge Control Ordinance;
29. that the project shall meet all the requirements of the California Building and Uniform Fire Codes, as amended by the City of Burlingame;
30. that this project shall comply with Ordinance No. 1477, Exterior Illumination Ordinance;

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31. that construction access routes shall be limited in order to prevent the tracking of dirt onto the public right-of-way, clean off-site paved areas and sidewalks using dry sweeping methods;

***The following conditions shall be met during the Building Inspection process prior to the inspections noted in each condition:***

32. that prior to scheduling the foundation inspection a licensed surveyor shall locate the property corners, set the building envelope;
33. that prior to scheduling the framing inspection, the project architect, engineer or other licensed professional shall provide architectural certification that the architectural details such as window locations and bays are built as shown on the approved plans; if there is no licensed professional involved in the project, the property owner or contractor shall provide the certification under penalty of perjury. Certifications shall be submitted to the Building Division;
34. that prior to scheduling the roof deck inspection, a licensed surveyor shall shoot the height of the roof ridge and provide certification of that height to the Building Division;
35. that prior to final inspection, Planning Division staff will inspect and note compliance of the architectural details (trim materials, window type, etc.) to verify that the project has been built according to the approved Planning and Building plans;

***The following conditions of approval are from the CEQA 15183 Checklist prepared for the project:***

36. that the project sponsor shall ensure that all off-road diesel-powered equipment used during construction is equipped with engines that meet EPA Tier 4 "final" emission standards;
37. that the project sponsor, or contractor, shall implement the following measures to minimize hazards for birds:
  - Reduce large areas of transparent or reflective glass;
  - Locate water features, trees, and bird habitat away from building exteriors to reduce reflection;
  - Reduce or eliminate the visibility of landscaped areas behind glass;
  - Turn non-emergency lighting off at night, especially during bird migration season (February–May and August–November);
  - Include window coverings that adequately block light transmission from rooms where interior lighting is used at night and install motion sensors or controls to extinguish lights in unoccupied spaces;
  - Design and/or install lighting fixtures that minimize light pollution, including light trespass, over-illumination, glare, light clutter, and skyglow, and use bird-friendly colors for lighting when possible. The City of San Francisco's *Standards for Bird-*

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*safe Buildings*<sup>1</sup> provides an overview of building design and lighting guidelines to minimize bird/building collisions that could be used to guide the Project Sponsor.

38. that the Project Sponsor shall provide acoustical treatments for the proposed emergency generator to ensure that noise levels do not exceed the 60 dBA  $L_{eq}$  daytime threshold for mechanical equipment. In addition, the Project Sponsor shall provide acoustical treatments as needed for the proposed HVAC equipment to ensure noise levels do not exceed the nighttime noise limit of 50 dBA  $L_{eq}$  at the property line. These limits are in accordance with the noise limitations specified in the City Municipal Code. Any required acoustical treatments can be specified by retaining a qualified acoustical consultant. Treatments may include, but are not limited to:
- Installing stationary equipment as far as possible from offsite noise-sensitive land uses and the property line to reduce noise levels at adjacent parcels;
  - Constructing enclosures around noise-generating mechanical equipment;
  - Placing barriers around the equipment;
  - Using mufflers or silencers on equipment exhaust fans;
  - Orienting or shielding equipment to protect sensitive uses to the greatest extent feasible; and
  - Limiting the testing of emergency generators to daytime hours (7:00 a.m. to 10:00 p.m.)
39. that prior to the start of construction, a vibration control plan shall be prepared to describe the specific methods that the contractor will use to avoid vibration impacts on the historic Post Office building during removal and temporary relocation, as applicable. The plan shall include a building inspection and conditions report prior to construction, which will determine the need for ongoing monitoring or subsequent inspections. Because of the historic status of the building, the plan shall provide details on how vibration from Project demolition and the operation of heavy equipment near this building at the original and/or the new building site will be addressed. If determined at the temporary site that the potential for damage to the building during construction is high, the temporary location for building storage shall be modified so that vibration from construction will be below the applicable damage threshold for the building;
40. that as construction conditions permit, heavy vibration-producing equipment such as hoe rams, bulldozers, and drill rigs will be located at least 25 feet away from adjacent office buildings. During construction, if this type of equipment is required inside 25 feet, alternative techniques that rely on smaller equipment types shall be used. If the use of heavy equipment is required within 25 feet of buildings and no equipment alternatives are feasible, a designated coordinator shall be responsible for handling and responding to any complaints received during such periods of construction. A reporting program shall be required that documents complaints received, actions taken, and the effectiveness of these actions in resolving disputes;

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<sup>1</sup> City and County of San Francisco. 2011. *Standards for Bird-safe Buildings*. San Francisco Planning Department. July 14. Available: [http://www.sf-planning.org/ftp/files/publications\\_reports/bird\\_safe\\_bldgs/Standards\\_for\\_Bird\\_Safe\\_Buildings\\_7-5-11.pdf](http://www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Standards_for_Bird_Safe_Buildings_7-5-11.pdf). Accessed: September 11, 2020.

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***The following conditions of approval are Standard Conditions of Approval applicable to all project within the Burlingame Downtown Specific Plan Area:***

41. that prior to issuance of a demolition, grading, building, or other construction-related permit the project sponsor shall prepare a Geotechnical Study identifying the depth to the seasonal high water table at the project site. No permanent groundwater dewatering would be allowed. Instead, all areas for non-residential uses shall be flood-proofed and anchored, in accordance with floodplain development requirements, to the design depth as recommended by geotechnical engineer. Final design shall be prepared by a qualified professional engineer and approved by the Burlingame Department of Public Works prior to receiving a building permit;
42. the project sponsor shall implement all appropriate control measures from the most currently adopted air quality plan at the time of project construction;
43. the project sponsor shall ensure implementation of the following mitigation measures during project construction, in accordance with BAAQMD standard mitigation requirements:
  - a. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day or as necessary.
  - b. All haul trucks transporting soil, sand, or other loose material offsite shall be covered or otherwise loaded consistent with California Vehicle Code Section 23114.
  - c. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry sweeping is prohibited.
  - d. All vehicle speeds on unpaved roads shall be limited to 15 mph.
  - e. All roadways, driveways, sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
  - f. Idling times shall be minimized either by shutting off equipment when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of the California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
  - g. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
  - h. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective

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action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

44. the project sponsor shall implement the following Greenhouse Gas reduction measures during construction activities:
  - a. Alternative-Fueled (e.g., biodiesel, electric) construction vehicles/equipment shall make up at least 15 percent of the fleet.
  - b. Use at least 10 percent local building materials.
  - c. Recycle at least 50 percent of construction waste or demolition materials.
45. that the project sponsors Shall Provide Adequate Secure Bicycle Parking in the Plan Area at a Minimum Ratio of 1 Bicycle Spot for Every 20 Vehicle Spots;
46. that employers shall post and update information on alternate modes of transportation for the area (i.e. bus/shuttle schedules and stop locations, maps);
47. that long-term parking lots shall provide preferential parking for carpool/vanpool drivers as well as low/no emission vehicles;
48. the project sponsor shall incorporate recycling measures and incentives such that a solid waste diversion rate of 75% is achieved upon occupation of each phase of plan development;
49. the project sponsor shall incorporate commercial water efficiency measures such that water consumption is decreased by a minimum of 10 percent over current standard water demand factors;
50. that prior to issuance of a demolition, grading, or other construction-related permit, all development proposals in the Downtown Specific Plan Area that require a traffic study shall evaluate trip contribution to the California Drive/Lorton Avenue intersection. For projects that are determined to contribute trips to the California Drive/Lorton Avenue intersection, condition of approval #51 shall apply;
51. that prior to issuance of a demolition, grading, building, or other construction-related permit, in order to fund the installation of a new traffic signal, the City of Burlingame shall collect a fair share fee from each project sponsor identified under condition of approval #50. The fair share fee shall be determined in consultation with the City Engineer;
52. that prior to issuance of a demolition, grading, building, or other construction-related permit, where avoidance of regulated wetlands and waters is not feasible, and before any construction activities are initiated in jurisdictional areas, the City shall consult with USACE, RWQCB, and CDFG to determine if permits would be required for construction

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activities. If deemed necessary, the following permits shall be obtained, as applicable to the activities in question.

- CWA Section 404 permit from the USACE.
- CWA Section 401 water quality certification from the RWQCB.
- CDFG Section 1602 streambed alteration agreement from CDFG.

Copies of these permits shall be provided to the contractor, along with the construction specifications. The project sponsor shall be responsible for complying with all of the conditions set forth in these permits, including any financial responsibilities;

53. that construction shall avoid the March 15 through August 31 avian nesting period to the extent feasible. If it is not feasible to avoid the nesting period, a survey for nesting birds shall be conducted by a qualified wildlife biologist no earlier than 7 days prior to construction. The area surveyed shall include all clearing/construction areas, as well as areas within 250 ft. of the boundaries of these areas, or as otherwise determined by the biologist. In the event that an active nest is discovered, clearing/construction shall be postponed within 250 ft. of the nest, until the young have fledged (left the nest), the nest is vacated, and there is no evidence of second nesting attempts;
54. that for projects within the Plan Area that require excavation, a Phase I Environmental Site Assessment (and Phase II sampling, where appropriate) would be required. If the Phase I Environmental Site Assessment determines that remediation is required, the project sponsor would be required to implement all remediation and abatement work in accordance with the requirements of the Department of Toxic Substances Control (DTSC), Regional Water Quality Control Board (RWQCB), or other jurisdictional agency;
55. that the following practices shall be incorporated into the construction documents to be implemented by the project contractor.
  - a. Maximize the physical separation between noise generators and noise receptors. Such separation includes, but is not limited to, the following measures:
    - Use heavy-duty mufflers for stationary equipment and barriers around particularly noisy areas of the site or around the entire site; - Use shields, impervious fences, or other physical sound barriers to inhibit transmission of noise to sensitive receptors;
    - Locate stationary equipment to minimize noise impacts on the community; and
    - Minimize backing movements of equipment.
  - b. Use quiet construction equipment whenever possible.
  - c. Impact equipment (e.g., jack hammers and pavement breakers) shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically-powered tools. Compressed air exhaust silencers shall be used on other equipment. Other quieter procedures, such as drilling rather than using impact equipment, shall be used whenever feasible.



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56. the project sponsor shall incorporate the following practice into the construction documents to be implemented by construction contractors: The project sponsor shall require that loaded trucks and other vibration-generating equipment avoid areas of the project site that are located near existing residential uses to the maximum extent compatible with project construction goals;
57. that if the project increases sewer flows to the sanitary sewer system, the project sponsor shall coordinate with the City Engineer to determine if improvements to public sanitary sewer infrastructure are needed. If improvements are needed, the following shall apply:
  - that prior to issuance of a building permit, the project sponsor shall develop a plan to facilitate sanitary sewer improvements. The plan shall include a schedule for implementing sanitary sewer upgrades that would occur within the development site and/or contribution of a fair share fee toward those improvements, as determined by the City Engineer. The plan shall be reviewed by the City Engineer.
58. that prior to issuance of a building permit, the development plans shall be reviewed by the Fire Marshal to determine if fire flow requirements would be met given the requirements of the proposed project, and the size of the existing water main(s). If the Fire Marshal determines improvements are needed for fire protection services, then the following shall apply:
  - that prior to issuance of a building permit the project sponsor shall be required to provide a plan to supply adequate water supply for fire suppression to the project site, consistent with the Fire Marshal's requirements. The plan shall be reviewed by the Fire Marshal. The project sponsor shall be responsible for implementation of the plan including installation of new water mains, and/or incorporation of fire water storage tanks and booster pumps into the building design, or other measures as determined by the Fire Marshal.
59. that if evidence of an archeological site or other suspected cultural resource as defined by CEQA Guidelines Section 15064.5, including darkened soil representing past human activity ("midden"), that could conceal material remains (e.g., worked stone, worked bone, fired clay vessels, faunal bone, hearths, storage pits, or burials) is discovered during construction-related earth-moving activities, all ground-disturbing activity within 100 feet of the resources shall be halted and the City of Burlingame shall be notified. The project sponsor shall hire a qualified archaeologist to conduct a field investigation. The City of Burlingame shall consult with the archeologist to assess the significance of the find. Impacts to any significant resources shall be mitigated to a less-than significant level through data recovery or other methods determined adequate by a qualified archaeologist and that are consistent with the Secretary of the Interior's Standards for Archeological Documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC;
60. that should a unique paleontological resource or site or unique geological feature be identified at the project construction site during any phase of construction, the project

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manager shall cease all construction activities at the site of the discovery and immediately notify the City of Burlingame. The project sponsor shall retain a qualified paleontologist to provide an evaluation of the find and to prescribe mitigation measures to reduce impacts to a less-than-significant level. Work may proceed on other parts of the project site while mitigation for paleontological resources or geologic features is carried out. The project sponsor shall be responsible for implementing any additional mitigation measures prescribed by the paleontologist and approved by the City; and

61. that if human remains are discovered at any project construction site during any phase of construction, all ground-disturbing activity within 100 feet of the resources shall be halted and the City of Burlingame and the County coroner shall be notified immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project sponsor shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The City of Burlingame shall be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of State law, as set forth in CEQA Guidelines section 15064.5(e) and Public Resources Code section 5097.98. The project sponsor shall implement approved mitigation, to be verified by the City of Burlingame, before the resumption of ground-disturbing activities within 100 feet of where the remains were discovered.

***The following conditions of approval are from applicable policies of the 2040 General Plan or the Environmental Impact Report prepared for the 2040 General Plan:***

62. **Policy HP-3:12: Project-Specific Construction Best Practices.** The Project sponsor shall ensure implementation of the following BMPs during Project construction, in accordance with the BAAQMD's standard requirements:
- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, unpaved access roads) shall be watered two times per day.
  - All haul trucks transporting soil, sand, or other loose material offsite shall be covered.
  - All visible mud or dirt track-out onto adjacent public roads shall be removed using wet-power vacuum street sweepers at least once per day. The use of dry-power sweeping shall be prohibited.
  - All vehicle speeds on unpaved roads shall be limited to 15 mph.
  - All roadways, driveways, and sidewalks that are to be paved shall be paved as soon as possible. Building pads shall be laid as soon as possible after grading, unless seeding or soil binders are used.
  - Idling times shall be minimized, either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure, Title 13, Section 2485 of California Code of

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Regulations). Clear signage shall be provided for construction workers at all access points.

- All construction equipment shall be maintained and properly tuned, in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- A publicly visible sign with the name and telephone number of the person to contact at the lead agency regarding dust complaints shall be posted. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

63. **PSM-CUL-1: Undiscovered Archaeological Resources.** A qualified archaeologist shall conduct a pre-construction archaeological sensitivity training session for the excavation crew. This training will include an overview of what cultural resources are and provide information regarding why such resources are important, archaeological terms (such as site, feature, deposit), project site history, the types of cultural resources that are likely to be uncovered during excavation, the laws that protect cultural resources, and the protocol for unanticipated discoveries (see below). An "Alert Sheet" shall be posted in conspicuous locations on the project site to alert personnel to the procedures and protocols to follow after discovery of potentially significant precontact archaeological resources.
64. **PSM-CUL-1: Undiscovered Archaeological Resources.** In the event that archaeological resources are encountered during construction, work shall be halted within 100 feet of the discovery and the area avoided until a qualified professional archaeologist has evaluated the situation and provided appropriate recommendations. If the find is determined to be potentially significant, the archaeologist, in consultation with the Native American representative, shall develop a treatment plan, which could include site avoidance, capping, or data recovery.
65. **PSM-CUL-1: Undiscovered Archaeological Resources.** If human remains are unearthed during construction, pursuant to Section 50977.98 of the Public Resources Code and Section 7050.5 of the State Health and Safety Code, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains. The county coroner shall be informed to evaluate the nature of the remains. If the remains are determined to be of Native American in origin, the lead agency shall work with the NAHC and the applicant to develop an agreement for treating or disposing of the human remains.
66. **PSM-CUL-1: Undiscovered Archaeological Resources.** If archaeological resources are identified, a final report summarizing the discovery of cultural materials shall be submitted to the City's Community Development Director prior to issuance of building permits. This report shall contain a description of the mitigation program that was implemented and its results, including a description of the monitoring and testing program, a list of the resources found and conclusion, and a description of the disposition/curation of the resources.

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67. **CS-4.10: Project-Specific Construction Noise Control Measures.** To reduce construction noise impacts, the project contractor(s) shall implement the following actions:
- In compliance with Chapter 18.07.110 of the Municipal Code, construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to the hours of 8:00 a.m. to 7:00 p.m., Monday to Friday, and 9:00 a.m. to 6:00 p.m. on Saturdays, unless permission is granted with a development permit or other planning approval.
  - Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
  - Avoid the use of circular saws, miter/chop saws, and radial arm saws near the adjoining noise-sensitive receptors. Where feasible, shield saws with a solid screen with material having a minimum surface density of 2 pounds per square foot (e.g., such as 0.74 inch plywood).
  - Unnecessary idling of internal combustion engines shall be strictly prohibited.
  - Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.
  - Maintain smooth vehicle pathways for trucks and equipment accessing the site and avoid local residential neighborhoods as much as possible.
  - During final grading, substitute graders for bulldozers, where feasible. Wheeled heavy equipment are quieter than track equipment and should be used where feasible.
  - During interior construction, locate noise-generating equipment within the building to break the line-of-sight to the adjoining receptors.
  - The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.
  - Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g. bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.
68. **Policy CS-4.12: Project-Specific Vibration Control Measures.** To reduce construction vibration impacts, the project contractor(s) shall implement the following actions:
- A list of all heavy construction equipment to be used for the proposed project known to produce high vibration levels (tracked vehicles, vibratory compaction, jackhammers, hoe rams, etc.) shall be submitted to the City of Burlingame by the contractor. This list shall be used to identify equipment and activities that would potentially generate substantial vibration and to define the level of effort for reducing vibration levels below the thresholds.
  - Operating equipment on the construction site shall be placed as far as possible from vibration-sensitive receptors.

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- Smaller equipment shall be used where possible to minimize vibration levels below the limits.
  - Vibratory rollers and tampers shall not be used within 20 feet of abutting buildings.
  - Demolition methods not involving impact tools shall be used.
  - Alternative construction methods to reduce vibration levels below the limits shall be identified and used.
  - Dropping of heavy objects or materials shall be avoided.
  - Neighbors within 100 feet of the construction site shall be notified of the construction schedule and that there could be noticeable vibration levels during project construction activities.
  - If heavy construction is proposed within 20 feet of abutting buildings, a construction vibration-monitoring plan shall be implemented prior to, during, and after vibration generating construction activities located within these setbacks. All plan tasks shall be undertaken under the direction of a licensed Professional Structural Engineer in the State of California and be in accordance with industry accepted standard methods. The construction vibration monitoring plan should be implemented to include the following tasks:
    - Performance of a photo survey, elevation survey, and crack monitoring survey for the abutting buildings. Surveys shall be performed prior to and after completion of vibration generating construction activities located within 20 feet of the structure. The surveys shall include internal and external crack monitoring in the structure, settlement, and distress, and shall document the condition of the foundation, walls and other structural elements in the interior and exterior of the structure.
    - Conduct a post-survey on the abutting buildings where either monitoring has indicated high levels or complaints of damage. Make appropriate repairs in accordance with the Secretary of the Interior's Standards where damage has occurred as a result of construction activities.
    - The results of any vibration monitoring shall be summarized and submitted in a report shortly after substantial completion of each phase identified in the project schedule. The report will include a description of measurement methods, equipment used, calibration certificates, and graphics as required to clearly identify vibration-monitoring locations. An explanation of all events that exceeded vibration limits will be included together with proper documentation supporting any such claims.
    - Designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person shall be clearly posted on the construction site.
69. **HP-5.2: Migratory Birds.** Avoid construction activities that involve tree removal between March and June, unless a bird survey has been conducted to determine that the tree is unused during the breeding season by avian species protected under California Fish and Game Codes 3503, 3503.5, and 3511;

## EXHIBIT "A"

Conditions of Approval for Environmental Review, Commercial Design Review, Historic Variances and Parking Easement.

**220 Park Road**

Effective December 3, 2020

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70. **MM 12-1: Paleontological Assessment.** In areas containing middle to late Pleistocene-era sediments where it is unknown if paleontological resources exist, prior to grading an assessment shall be made by a qualified paleontological professional to establish the need for paleontological monitoring. Should paleontological monitoring be required after recommendation by the professional paleontologist and approval by the Community Development Director, paleontological monitoring shall be implemented.

**Paleontological Monitoring.** A project that requires grading plans and is located in an area of known fossil occurrence or that has been demonstrated to have fossils present in a paleontological field survey or other appropriate assessment shall have all grading monitored by trained paleontological crews working under the direction of a qualified professional, so that fossils exposed during grading can be recovered and preserved.

Should any potentially unique fossils be encountered during development activities, work shall be halted immediately within 50 feet of the discovery, the City of Burlingame Planning Department shall be immediately notified, and a qualified paleontologist shall be retained to determine the significance of the discovery.

**Paleontological Recovery, Identification, and Curation.** The City and a project applicant shall consider the mitigation recommendations of the qualified paleontologist for any unanticipated discoveries. The City and the project applicant shall consult and agree upon implementation of measures that the City and project applicant deem feasible and appropriate. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. The project applicant shall be required to implement any mitigation necessary for the protection of paleontological resources.

**Paleontological Findings.** Qualified paleontological personnel shall prepare a report of findings (with an itemized appendix of specimens) subsequent to implementation of paleontological recovery, identification, and curation. A preliminary report shall be submitted, subject to approval by the Community Development Director before granting of building permits, and a final report shall be submitted, subject to approval by the Community Development Director before granting of occupancy permits.

*220 Park Road – Staff Report Attachments*

**Notice of Public Hearing (Planning Commission)**

**– Mailed November 13, 2020**



CITY OF BURLINGAME  
COMMUNITY DEVELOPMENT DEPARTMENT  
501 PRIMROSE ROAD  
BURLINGAME, CA 94010  
PH: (650) 558-7250  
www.burlingame.org

**Project Site: 220 Park Road, zoned HMU**

The City of Burlingame Planning Commission announces the following virtual public hearing via Zoom **on Monday, November 23, 2020 at 7:00 P.M.** You may access the meeting online at [www.zoom.us/join](http://www.zoom.us/join) or by phone at (669) 900-6833:

Meeting ID: 882 8688 2408      Passcode: 706924

**Description:** Application for Environmental Review, Commercial Design Review, Historic Variance for Height (Title 21) and Parking, and Request for a Parking Easement (below grade under Lot E) for the redevelopment and restoration of portions of the existing Post Office building and construction of a New 6-story Office Project with Ground Floor Retail and two Levels of Underground Parking.

Members of the public may provide written comments by email to: [publiccomment@burlingame.org](mailto:publiccomment@burlingame.org).

Mailed: November 13, 2020  
*(Please refer to other side)*

**PUBLIC HEARING  
NOTICE**

**City of Burlingame - Public Hearing Notice**

If you have any questions about this application or would like to schedule an appointment to view a hard copy of the application and plans, please send an email to [planningdept@burlingame.org](mailto:planningdept@burlingame.org) or call (650) 558-7250.

Individuals who require special assistance or a disability-related modification or accommodation to participate in this meeting, or who have a disability and wish to request an alternative format for the agenda, meeting notice, agenda packet or other writings that may be distributed, should contact the Planning Division at [planningdept@burlingame.org](mailto:planningdept@burlingame.org) or (650) 558-7250 by 10 am on the day of the meeting.

If you challenge the subject application(s) in court, you may be limited to raising only those issues you or someone else raised at the public hearing, described in the notice or in written correspondence delivered to the city at or prior to the public hearing.

Property owners who receive this notice are responsible for informing their tenants about this notice.

Kevin Gardiner, AICP  
Community Development Director

*(Please refer to other side)*



*220 Park Road – Staff Report Attachments*

**Area Map**

**220 Park Road  
500' noticing  
APN #: 029.204.250 and 029.204.230**

