2040 General Plan + Downtown & El Camino Real Specific Plan

Draft Environmental Impact Report

State Clearinghouse #: 2021120052

prepared for

City of Millbrae Community Development Department 621 Magnolia Avenue Millbrae, California 94030 Contact: Nestor Guevara, Associate Planner

prepared by

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

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Appendices

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Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADU	accessory dwelling unit
AIA	Airport Influence Area
AIRFA	American Indian Religious Freedom Act
ALUCP	Airport Land Use Compatibility Plan
АТР	Active Transportation Plan
AQI	Air Quality Index
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BAWSCA	Bay Area Water Supply and Conservation Agency
BERD	California State Office of Historic Preservation Built Environment Directory
BMP	best management practices
C/CAG	City/County Association of Governments
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CalGreen	California Green Building Standards Code
CalOES	California Office of Emergency Services
Cal OSHA	California Division of Occupational Safety and Health
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCFD	Central County Fire Department
CCR	California Code of Regulations
CDF	California Department of Finance
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission

CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CGC	California Government Code
CHRIS	California Historical Resources Information System
CMU	Corridor Mixed Use
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CWA	Federal Clean Water Act
CWC	California Water Code
dB	Decibel
dBA	A-weighted decibel
DOC	Department of Conservation
DOF	Department of Finance
DMU	Downtown Mixed Use
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
DWR	California Department of Water Resources
ECA	Essential Connectivity Area
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ESA	Federal Endangered Species Act
ESU	evolutionary significant unit
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program
FMP	Fisheries Management Plans

FRA	Federal Responsibility Area
FTA	Federal Transit Administration
GHG	greenhouse gas
gpd	gallons per day
GWh	gigawatt-hours
HABS	Historic American Building Survey
НСР	Habitat Conservation Plan
HSC	Health and Safety Code
HUD	Federal Department of Housing and Urban Development
HVAC	Heating, Ventilation and Air Conditioning
in/sec	Inches per second
IPaC	Information for Planning and Conservation
IPCC	Intergovernmental Panel on Climate Change
L _{dn}	Day-Night Average Level
L _{eq}	Equivalent Noise Level
LEV	Low-Emission Vehicle
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
LOS	Level of Service
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
MLD	most likely descendant
MM	Mitigation Measure
MPWD	Mid-Peninsula Water District
MSASP	Millbrae Station Area Specific Plan
MSD	Millbrae School District
MTC	Metropolitan Transportation Commission
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Communities Conservation Plan
NCMU	Neighborhood Commercial Mixed Use
NMFS	National Marine Fisheries Service
NPDES	National Pollutant Discharge Elimination System

NPPA	Native Plant Protection Act
NWI	National Wetlands Inventory
NWIC	Northwest Information Center
OEHHA	Office of Environmental Health Hazard Assessment
OES	San Mateo County Office of Emergency Services
OPR	California Governor's Office of Planning and Research
PDA	Priority Development Area
PG&E	Pacific Gas and Electric Company
PPM	parts per million
PQS	Professional Qualifications Standards
PRC	Public Resources Code
RFMU	Residential Focused Mixed Use
RTP	Regional Transportation Plan
RHNA	Regional Housing Needs Allocation
ROG	reactive organic gas
RWQCB	Regional Water Quality Control Board
RWS	Regional Water System
SB	Senate Bill
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
SFO	San Francisco International Airport
SGMA	Sustainable Groundwater Management Act
SIP	State Implementation Plan
SFBAAB	San Francisco Bay Area Air Basin
SFPUC	San Francisco Public Utilities Commission
SFRWQCB	San Francisco Bay Regional Water Quality Control Board
SHMP	State of California Multi-Hazard Mitigation Plan
SLF	Sacred Lands File
SMCCFD	San Mateo County Consolidated Fire District
SMCSO	San Mateo County Sheriff's Office
SR	state route
SRA	State Responsibility Area
SSC	Species of Special Concern

SVP	Society of Vertebrate Paleontology
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	toxic air contaminant
TDM	Transportation Demand Management
TIA	Transportation Impact Analysis
TNC	EV Transportation Network Company vehicles
тос	Transit Oriented Development
TOD	Transit-Oriented Development
UCERF	Uniform California Earthquake Forecast
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USDOT	United States Department of Transportation
USFWS	United States Fish and Wildlife Service
USEPA	United States Environmental Protection Agency
USGS	U.S. Geological Survey
VDECS	Verified Diesel Emission Control Strategies
VMT	vehicle miles traveled
VOC	volatile organic compounds
VT	vehicle trips
WOTUS	Waters of the United States
WQS	Water Quality Standards
WUI	Wildland-Urban Interface
ZEV	zero-emission vehicles

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Executive Summary

This document is an Environmental Impact Report (EIR) analyzing the environmental effects of the proposed Millbrae 2040 General Plan and Downtown & El Camino Real Specific Plan (proposed plans). This section summarizes the characteristics of the proposed plans, alternatives to the proposed plans, and the environmental impacts and mitigation measures associated with implementation of the proposed plans.

Project Synopsis

Lead Agency Contact Person

Nestor Guevara, Associate Planner Millbrae Planning Division 621 Magnolia Avenue, Millbrae, CA 94030 nguevara@ci.millbrae.ca.us

Project Description

This EIR has been prepared to examine the potential environmental effects of the proposed plans. The following is a summary of the full project description, which can be found in Chapter 2, *Project Description*.

As part of an overarching planning process, the City of Millbrae (City) proposes to adopt:

- 1) an update to the City General Plan, including six respective City General Plan elements exclusive of the Housing Element that is being prepared at a later date and including associated zoning amendments (collectively referred to in this EIR as the 2040 General Plan); and
- 2) the Downtown and El Camino Real Specific Plan, including associated zoning amendments (collectively referred to in this EIR as the Specific Plan).

The 2040 General Plan would serve as a long-term framework for future growth, reflect issues identified from community input and changes in State law, and update elements of the General Plan including the Land Use, Mobility, Safety, Recreation, Environmental Justice, and Conservation Elements. The Specific Plan would support sustainable, mixed-use development in downtown Millbrae near the Millbrae Station serving Bay Area Rapid Transit (BART), SamTrans, and Caltrain with provision of development, streetscape, and design standards and guidelines, and the Zoning Code would be amended to ensure consistency with the General Plan and Downtown and El Camino Real Specific Plan.

Plans' Objectives

The City of Millbrae has the following objectives for the implementation of the proposed plans.

2040 General Plan

The City's General Plan objectives are as follows:

- Promote the revitalization of El Camino Real into a "grand boulevard" that creates a welcoming gateway into Millbrae
- Improve pedestrian and bicycle mobility and enhance the streetscape along the El Camino Real corridor to create an inviting pedestrian environment
- Encourage transit-oriented, residential, and mixed-use developments along El Camino Real that create an exciting place for people to live, work, shop, and play
- Create a physical space and the infrastructure to captivate a mix of businesses that serve the range of resident needs and attract visitors
- Foster investments in public spaces that elevate downtown as an urban village thriving with community activity
- Support the preservation and broadening of the existing housing stock, while encouraging innovative housing types and preserving bay views
- Provide a safe and complete transportation network that meets the needs of various users and focuses on smart, safe, and seamless transportation improvements that encourage walkability and bikeability and increase accessibility between neighborhoods, downtown, and the intermodal station
- Enhance Millbrae's character and reputation by creating vibrant places that bring community members together and draw visitors from the region
- Encourage Millbrae to remain an inclusive urban community with strong civic pride by improving and creating new public gathering spaces through public art, local landmarks, safety measures, and park or plaza improvements
- Encourage walking, biking, and public transportation and reduce automobile dependence, noise, and harmful air pollutants
- Strive to achieve zero waste and expanded electrical infrastructure, tertiary wastewater treatment, and urban forest as well as promote the efficient use of natural resources including water, energy, and land, to reduce impacts on regional watersheds
- Protect the health and safety of residents and support a high-quality living environment by maintaining infrastructure, services, and programs that meet the needs of the community
- Support increased use of technology to improve the equitable, transparent, and timely delivery
 of City services
- Foster economic growth by cultivating a diversity of businesses based on innovation, technology, and local entrepreneurship that provide high-paying jobs and increase the tax base
- Emphasize the highest and best use of land for economic development, business retention, entrepreneurship, and growth in life sciences, retail, local services, other technology sectors
- Encourage healthy lifestyles for residents and visitors by increasing opportunities for physical activity, availability of nutritious foods, quality education, realistic living wages, access to affordable healthcare and childcare, options for affordable housing, clean air and water, and a safe environment that promotes walking and biking
- Encourage active living by elevating recreational programming for persons of various ages and abilities, enhancing parks and recreation facilities, and improving bike and pedestrian connections throughout the City and into neighboring cities

Specific Plan

The City's Specific Plan objectives are as follows:

- Transform the Millbrae primary areas of business and commerce into vibrant and connected mixed-use centers of cultural and economic activity
- Enhance quality of life by providing a roadmap for future growth and investment to create an exciting place for people to live, work, shop, and visit
- Emphasize transit-oriented, mixed-use development to provide a purposeful mix of housing, restaurants, retail, hotels, offices, and entertainment uses
- Provide the overarching policy framework and development regulations that are necessary to achieve the plan's vision

Alternatives

As required by the California Environmental Quality Act (CEQA), this EIR examines alternatives to the proposed plans. Studied alternatives include the following three alternatives. Based on the alternatives analysis, Alternative 1 was determined to be the environmentally superior alternative.

- Alternative 1: Adopted General Plan Buildout
- Alternative 2: Increased Development, Height, and Density
- Alternative 3: Increased Residential

Alternative 1

The Adopted General Plan Buildout Alternative (or Alternative 1) assumes that the current land use and zoning designations would not change from the City's current adopted 1998 General Plan. The 2040 General Plan would not be adopted and no Specific Plan implementation would occur. Current land uses for the residential units and hotel, office, general commercial, and restaurant area would remain unchanged under Alternative 1. Future buildout would continue to follow the current designations. For purposes of the environmental analysis, it was assumed that the number of persons per household would still be 2.74.¹ Based on this, the population estimate would decrease by 5,151. The alternative would not fulfill plans' objectives because it would not update the City of Millbrae's General Plan or adopt the Downtown and El Camino Real Specific Plan. Without these plans, Millbrae would lack a long-term blueprint for redevelopment throughout the General Plan area and a roadmap for growth within the Downtown district and El Camino Real Corridor (the Specific Plan area).

Alternative 2

The Increased Development, Height, and Density Alternative (or Alternative 2) would adopt the 2040 General Plan and Downtown and El Camino Real Specific Plan with an increase in proposed building height throughout the Specific Plan area. This would increase developmental potential above the proposed plans (or net change) as follows: office space 62,000 square feet, general commercial space 124,000 square feet, restaurant space 68,400 square feet, and 626 residential units. The maximum height of the buildings would not exceed the SFO proximity height limitations.

¹ California Department of Finance. 2022. Table E-5 Population and Housing Estimates for Cities, Counties, and the State — January 1, 2021-2022. Available: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/

Alternative 2 net change calculations were based on the following assumptions:

- Hotel buildout remains the same due to the SFO height restrictions.
- Office, general commercial, and restaurant spaces would increase by four stories each.
- Residential space would increase by two stories.
- An overall one-story increase would equal to a 10 percent increase in square footage.

Furthermore, for purposes of the environmental analysis, it was assumed that the number of persons per household would still be 2.74.² Based on this, the population estimate is projected to increase by 1,715 under Alternative 2.

Alternative 2 would fulfill most of the proposed plans' objectives with the increase in density. However, not all of the proposed plans' objectives would be achieved because the increased building heights would likely obstruct the Bay views that would otherwise be preserved. There would also be a potential increase in significant impacts on resources related to air quality due to the temporary construction that would take place over time to construct any additional structures that the height increases would allow for.

Alternative 3

The Increased Residential Alternative (or Alternative 3) would increase residential buildout by reducing restaurant, office, and general commercial square footage and eliminating all hotel development throughout the General Plan and Specific Plan areas. The reduced restaurant, office, and other commercial use areas would be rezoned for 100 percent residential use. Areas not rezoned would remain under their original designations but be at a smaller density due to any non-residential area being either reduced or eliminated. As a result, the net change would involve a decrease in hotel land use area and number of rooms by 330,000 square feet and 460 rooms, office land use area by 16,717 square feet, general commercial land use area by 27,672 square feet, and restaurant land use area by 15,431 square feet.

Alternative 3 net change calculations were based on the following assumptions:

- Density equated to 80 units per acre.
- The buildout would not alter the existing Commercial Mixed-Use area of Safeway (CMU-8). This is based on the assumption that this area is unlikely to be repurposed for residential development due to its community importance. However, this resulted in only 5.28 acres of Commercial Preference area remaining. This is what helped determined the square footage of the office and restaurant areas, although it was not entirely based off of this.
- The areas designated as Residential Focused Mixed Use would mostly be used as Residential Only. However, approximately one acre was allocated towards the Commercial Preference area as leeway for development.

Furthermore, for purposes of the environmental analysis, it was assumed that the number of persons per household would still be 2.74.³ Based on this, there would be a 14,319-population increase.

² California Department of Finance. 2022. Table E-5 Population and Housing Estimates for Cities, Counties, and the State — January 1, 2021-2022. Available: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/

³ California Department of Finance. 2022. Table E-5 Population and Housing Estimates for Cities, Counties, and the State — January 1, 2021-2022. Available: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/

Making the area more resident-centered would allow for buildout potential to meet the plan objectives' residential-focused goals. There would also be a decrease in car transportation reliance due to the increase in living spaces that would allow locals to live closer to their workplaces and usual shops. This would achieve the plan objectives focused on reducing automobile dependance and encouraging walking. However, the City's General Plan goal to draw in visitors may not be met because the lack of hotel space would make it difficult for visitors to stay in the area for more than a day. This could also lead to an increase in incoming and outgoing traffic from visitors, which would impact clean air due to the increase in air pollutants. The lack of hotel space would also impact the plan objectives focused on mixed-use development due to the decrease in developmental variety.

Refer to Chapter 5, Alternatives, for the complete EIR alternatives analysis.

Areas of Known Controversy

The EIR scoping process did not identify areas of known controversy for the proposed plans. Public responses to the Notice of Preparation of a Draft EIR as well as public input received at the EIR scoping meeting held by the City are summarized in Chapter 1, *Introduction*.

Issues to be Resolved

There are no CEQA-related issues to be resolved at this time.

Issues Not Studied in Detail in the EIR

All environmental issue areas are analyzed in detail in this EIR.

Summary of Impacts and Mitigation Measures

Table ES-1 summarizes the environmental impacts, mitigation measures, and residual impacts (the impact after application of mitigation, if required) associated with implementation of the proposed plans. Impacts are categorized as follows:

- Significant and Unavoidable. An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the proposed plans are approved pursuant to Section15093 of the CEQA Guidelines.
- Less than Significant with Mitigation Incorporated. An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the CEQA Guidelines.
- Less than Significant. An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- No Impact: The proposed plans would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-1	Summary of Environmental Impacts	, Mitigation Measures,	and Residual Impacts
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Impact	Mitigation Measure(s)	Residual Impact
Aesthetics		
Impact AES-1. The 2040 General Plan and Specific Plan would facilitate development in areas along an urbanized corridor that do not offer notable scenic vistas through the plan areas. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact AES-2. Development facilitated by the 2040 General Plan and the Specific Plan would not be visible from designated or eligible scenic highways. There would be no impact.	No mitigation is required.	No impact
Impact AES-3. Individual projects facilitated by the 2040 General Plan and Specific Plan would have the potential change the visual character in the corridor along El Camino Real and Broadway. However, such projects would be required to comply with goals, policies, standards, and guidelines in the 2040 General Plan and Specific Plan that would reduce Impacts to less than significant levels.	No mitigation is required.	Less than Significant
Impact AES-4. Development facilitated by the proposed plans would create new sources of light or glare that could adversely affect daytime or nighttime views in the area. Impacts would be less than significant with mitigation measures incorporated.	AES-1 Adopt and Implement City Lighting Standards. The City shall adopt lighting standards intended to maintain ambient lighting levels. Area lighting should provide good visibility, minimum glare, and minimum spillage onto other properties or into the sky. Adoption of this regulation would encourage, through the regulation of the types, kinds, construction, installation and uses of outdoor electrically powered illuminating devices, lighting practices and systems to conserve energy without decreasing safety, utility, security, and productivity while enhancing nighttime enjoyment of property and night skies.	Less than Significant
Air Quality		
Impact AQ-1. Implementation of the 2040 General Plan and Specific Plan would be consistent with the BAAQMD's 2017 Clean Air Plan. Impacts would be less than significant.	No mitigation is required.	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
Impact AQ-2. Implementation of the 2040 General Plan and Specific Plan would result in the generation of air pollutants during construction of future projects, which could affect local air quality. Implementation of the proposed plans would also result in a net increase of criteria pollutants due to the operational VMT increase associated with retail uses. All feasible mitigation measures to reduce VMT are included as Policies in the Plans, and are, therefore, part of the plans. overall impacts would be significant and unavoidable.	 AQ-1 Implement BAAQMD Basic Construction Mitigation Measures. To reduce fugitive dust emissions from the construction of individual projects, the City shall require that all projects implement the BAAQMD Basic Construction Mitigation Measures. The BAAQMD Basic Construction Mitigation Measures. The BAAQMD Basic Construction Mitigation Measures are listed below: All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times a day. All haul trucks transporting soil, sand, or other loose material off-site 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 is prohibited. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour. All roadways, driveways, and 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. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of 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 manufacture's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper conditions prior to operation. 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 action within 48 hours. The Air District's number shall also be visible to ensure compliance with applicable regulations. 	Significant and Unavoidable
Impact AQ-3. Construction activities for individual projects facilitated by the 2040 General Plan and Specific Plan lasting longer than two months or located within 1,000 feet of sensitive receptors could expose sensitive receptors to substantial pollutant concentrations. Implementation of the proposed plans may also expose sensitive receptors to additional sources of toxic air contaminants. Impacts would be less than significant with mitigation.	AQ-2 Conduct Construction Health Risk Assessment. For individual projects (excluding ADUs, single-family residences, and duplexes) where construction activities would occur within 1,000 feet of sensitive receptors, would last longer than two months, and would not utilize Tier 4 and/or alternative fuel construction equipment, the project applicant shall coordinate with the City to determine if a construction health risk assessment (HRA) shall be performed. If an HRA is to be performed, the HRA shall determine potential risk and compare the risk to the following BAAQMD thresholds:	Less than Significant

Impact Impact AQ-4. The 2040 General Plan and Specific Plan	 Mitigation Measure(s) Non-compliance with Qualified Community Risk Reduction Plan; Increased cancer risk of > 10.0 in a million; Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute); or Ambient PM_{2.5} increase of > 0.3 µg/m³ annual average If risk exceeds the thresholds, measures such as requiring the use of Tier 4 and/or alternative fuel construction equipment shall be incorporated to reduce the risk to appropriate levels. No mitigation is required. 	Residual Impact
would not create objectionable odors that could adversely affect a substantial number of people. Impacts related to odors would be less than significant.		
Biological, Agricultural, and Forestry Resources		
Impact BIO-1. Development facilitated by the 2040 General Plan and/or Specific Plan could result in direct or indirect impacts to special-status species or their associated habitats including impacts to migratory bird nest sites. Impacts would be less than significant with mitigation incorporated.	BIO-1 Pre-Construction Bird Surveys, Avoidance, and Notification. For construction activities initiated during the bird nesting season (February 1 – September 15) involving removal of vegetation or other nesting bird habitat, including abandoned structures and other man-made features, a pre-construction nesting bird survey shall be conducted no more than 14 days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot and shall include a buffer around the construction site at a distance determined by a qualified biologist. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in California Bay Area communities (i.e., qualified biologist). If nests are found, an avoidance buffer shall be determined by a qualified biologist dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site. The buffer shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s) shall be prepared by a qualified biologist and shall be submitted to the City prior to the commencement of construction activities.	Less than Significant

Mitigation Measure(s)

Residual Impact

Future project site plans shall include a statement acknowledging compliance with the federal MBTA and California Fish and Game Code that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to September 15 and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.

BIO-2 Roosting Bat Surveys and Avoidance Prior to Removal. Prior to tree and structure removal, a qualified biologist shall conduct a focused survey of all trees and structures to be removed or impacted by construction activities to determine whether active roosts of special-status bats are present on site. Tree or structure removal shall be planned for either the spring or the fall and timed to ensure both suitable conditions for the detection of bats and adequate time for tree and/or structure removal to occur during seasonal periods of bat activity exclusive of the breeding season, as described below. Trees and/or structures containing suitable potential bat roost habitat features shall be clearly marked or identified. If no bat roosts are found, the results of the survey will be documented and submitted to the City within 30 days of the survey, after which no further action will be required.

If day roosts are present, the biologist shall prepare a site-specific roosting bat protection plan to be implemented by the contractor following the City's approval. The plan shall incorporate the following guidance as appropriate:

- When possible, removal of trees/structures identified as suitable roosting habitat shall be conducted during seasonal periods of bat activity, including the following:
 - a) Between September 1 and about October 15, or before evening temperatures fall below 45 degrees Fahrenheit and/or more than 0.5 inch of rainfall within 24 hours occurs.
 - b) Between March 1 and April 15, or after evening temperatures rise above 45 degrees Fahrenheit and/or no more than 0.5 inch of rainfall within 24 hours occurs.
- If a tree /structure must be removed during the breeding season and is identified as potentially containing a colonial maternity roost, then a qualified biologist shall conduct acoustic emergence surveys or implement other appropriate methods to further evaluate if the roost is an active maternity roost. Under the biologist's guidance, the contractor shall implement measures similar to or better than the following:

Impact	Mitigation Measure(s) Residual Impact
	 a) If it is determined that the roost is not an active maternity roost, then the roost may be removed in accordance with the other requirements of this measure. b) If it is found that an active maternity roost of a colonial roosting species is present, the roost shall not be disturbed during the breeding season (April 15 to August 31).
	 Tree removal procedures shall be implemented using a two-step tree removal process. This method is conducted over two consecutive days and works by creating noise and vibration by cutting non-habitat branches and limbs from habitat trees using chainsaws only (no excavators or other heavy machinery) on day one. The noise and vibration disturbance, together with the visible alteration of the tree, is very effective in causing bats that emerge nightly to feed to not return to the roost that night. The remainder of the tree is removed on day two.
	 Prior to the demolition of vacant structures within the project site, a qualified biologist shall conduct a focused habitat assessment of all structures to be demolished. The habitat assessment shall be conducted enough in advance to ensure the commencement of building demolition can be scheduled during seasonal periods of bat activity (see above), if required. If no signs of day roosting activity are observed, no further actions will be required. If bats or signs of day roosting by bats are observed, a qualified biologist will prepare specific recommendations such as partial dismantling to cause bats to abandon the roost, or humane eviction, both to be conducted during seasonal periods of bat activity, if required.
	 If the qualified biologist determines a roost is used by a large number of bats (large hibernaculum), bat boxes shall be installed near the project site. The number of bat boxes installed will depend on the size of the hibernaculum and shall be determined through consultation with CDFW. If a maternity colony has become established, all construction activities shall be postponed within a 500- foot buffer around the maternity colony until it is determined by a qualified biologist that the young have dispersed. Once it has been determined that the roost is clear of bats, the roost shall be removed immediately.

Impact	Mitigation Measure(s)	Residual Impact
Impact BIO-2. Development facilitated by the 2040 General Plan and/or Specific Plan could adversely impact riparian habitat, other sensitive natural communities, or protected wetlands in the General Plan area and/or Specific Plan area. Implementation of Federal, State, and local regulations and policies would ensure riparian habitat and wetlands are not significantly impacts. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact BIO-3. Development facilitated by the 2040 General Plan would avoid impacts to wildlife movement corridors by conserving Open Space areas in the General Plan area, as directed by policies in the 2040 General Plan. Development facilitated by the Specific Plan would not be placed in any areas used by wildlife as movement corridors, as the Specific Plan area is entirely developed. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact BIO-4. Development facilitated by the 2040 General Plan and/or Specific Plan would be required to conform with applicable local policies protecting biological resources. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact BIO-5. Development facilitated by the 2040 General Plan and/or Specific Plan would not conflict with an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan. No impact would occur.	No mitigation is required.	No impact
Impact BIO-6. Development facilitated by the 2040 General Plan and/or Specific Plan would not result in conversion of prime farmland, unique farmland, or farmland of statewide importance (farmland) to non- agricultural use nor conflict with existing zoning for agricultural use or a Williamson Act contract. No impact would occur.	No mitigation is required.	No Impact

Impact	Mitigation Measure(s)	Residual Impact
Impact BIO-7. Development facilitated by the 2040 General Plan and/or Specific Plan would not result in the conversion of land used for agricultural or forestry purposes. No impact would occur	No mitigation is required.	No Impact
Cultural and Tribal Cultural Resources		
Impact CR-1. The 2040 General Plan and Specific Plan have the potential to result in significant impacts if development carried out under the plans would cause a substantial adverse change in the significance of a historical resource. This impact would be significant and unavoidable with mitigation.	 CR-1 Prepare Historical Resources Evaluation for Projects Involving Buildings 45 years or Older and Implement Mitigation prior to and during Construction. A historical resources evaluation shall be prepared prior to approval of a project subject to discretionary review carried out under the 2040 General Plan and/or Specific Plan involving the demolition or substantial improvement, as defined in Section 8.50.020 of the Millbrae Municipal Code, and as deemed necessary by the Community Development Director of a building, structure, object, or other built environment feature that is 45 years of age or older. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify potential historical resources within the proposed development site. All properties 45 years of age or older shall be evaluated within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report will be submitted to the City for review and concurrence. If the proposed development, efforts shall be made to the extent feasible to ensure that impacts are mitigated. Application of mitigation shall generally be overseen by a qualified architectural historic architect meeting the PQS, unless unnecessary in the circumstances (e.g., preservation in place). In conjunction with a development application that may affect the historical resource, the historical resources evaluation report shall also identify and specify the treatment of character-defining features and construction activities. Efforts shall be made to the greates	Significant and Unavoidable

Impact	Mitigation Measure(s) Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR § 15126.4(b)(1)). Application of the Standards shall be overseen by a qualified architectural historian or historic architect meeting the PQS. In conjunction with any development application that may affect the historical resource, a report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the City for review and concurrence. As applicable, the report shall demonstrate how the project complies with the Standards and be submitted to the City for review and approval prior to the issuance of permits. If significant historical resources are identified on a development site and compliance with the Standards and or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. Mitigation measures may include documentation of the historical resource in the form of a Historic American Building Survey (HABS)-Like report. The report shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the PQS and submitted to the City prior to issuance of any permits for demolition or alteration of the historical resource.	Residual Impact
Impact CR-2. The 2040 General Plan and Specific Plan have the potential to result in significant impacts if development carried out under the plans would cause a substantial adverse change in the significance of an archaeological resource, including those that qualify as historical resources. This impact would be less than significant with mitigation.	CR-2 Conduct Archaeological Resources Assessment prior to Project Approval. Prior to approval of a project subject to discretionary review carried out under the 2040 General Plan or Specific Plan that will involve ground disturbance activities in native or previously undisturbed soils that may include, but are not limited to, pavement removal, potholing, grubbing, tree removal, excavation or grading, an archaeological resources assessment shall be prepared under the supervision of an archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in either prehistoric or historic archaeology. Assessments shall include a California Historical Resources Information System (CHRIS) records search at the Northwest Information Center (NWIC) and of the Sacred Lands File Search maintained by the Native American Heritage Commission (NAHC). The records searches shall characterize the results of previous cultural resource surveys and disclose any cultural resources that have been recorded and/or evaluated in and around the project site. A Phase I pedestrian survey shall be undertaken in proposed project areas that are on previously undeveloped land to locate any surface cultural materials. By performing a records search, consultation with the NAHC, and a Phase I survey, a qualified archaeologist shall be able to classify the project area as having high, medium, or low sensitivity for archaeological resources.	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
	If the Phase I archaeological survey identifies resources that may be affected by the project, the archaeological resources assessment shall also include Phase II testing and evaluation. If resources are determined significant or unique through Phase II testing and site avoidance is not possible, appropriate site-specific mitigation measures shall be identified in the Phase II evaluation. These measures may include, but would not be limited to, a Phase III data recovery program, avoidance, or other appropriate actions to be determined by a qualified archaeologist. If significant archaeological resources cannot be avoided, impacts may be reduced to less than significant levels by filling on top of the sites rather than cutting into the cultural deposits. Alternatively, and/or in addition, a data collection program may be warranted, including mapping the location of artifacts, surface collection of artifacts, or excavation of the cultural deposit to characterize the nature of the buried portions of sites. Curation of the excavated artifacts or samples would occur as specified by the archaeologist	
	CR-3 Stop Work in the Event of Unanticipated Cultural Resources Discoveries during Construction. If cultural resources are encountered during ground-disturbing activities for a proposed project subject to policies of the 2040 General Plan or Specific Plan, work in the immediate area shall be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology in either prehistoric or historic archaeology shall be contacted immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by the project, additional work such as excavating the cultural deposit to fully characterize its extent, and collecting and curating artifacts may be warranted to mitigate any significant impacts to cultural resources. In the event that archaeological resources of Native American origin are identified during project construction, a qualified archaeologist will consult with the City to begin Native American consultation procedures.	
Impact CR-3. The discovery of human remains is always a possibility during ground disturbing activities. Ground disturbance associated with development carried out under the 2040 General Plan and Specific Plan may disturb or damage known or unknown human remains. This impact would be less than significant with adherence to existing regulations.	No mitigation is required.	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
Impact CR-4. Development carried out under the 2040 General Plan and Specific Plan has the potential to impact unidentified Tribal Cultural Resources. Impacts would be less than significant with mitigation.	CR-4 Suspend Work around Tribal Cultural Resources Identified during Construction. In the event that cultural resources of Native American origin are identified during construction of a proposed project implemented under the 2040 General Plan or Specific Plan, all earth-disturbing work in the vicinity of the find shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with State guidelines and in consultation with local Native American group(s). The mitigation plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery.	Less than Significant
Geology/Soils and Mineral Resources		
Impact GEO-1. Neither the 2040 General Plan nor the Specific Plan are located within an Alquist Priolo Earthquake Fault Zone, and, therefore, the proposed plans would not be subject to effects involving rupture of a known earthquake fault. There would be no impact.	No mitigation is required.	No impact
Impact GEO-2. Development facilitated by the proposed plans could result in exposure of people or structures to a risk of loss, injury, or death from seismic events. Development facilitated by the proposed plans could be located on a geologic unit or soil that is unstable or could become unstable resulting in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. However, with compliance with applicable laws and regulations, this impact would be less than significant.	No mitigation is required.	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
Impact GEO-3. Construction facilitated by the 2040 General Plan and Specific Plan would include ground disturbance such as excavation and grading that would result in loose or exposed soil. Disturbed soil could be eroded by wind or rain during a storm event, which could result in the loss of topsoil. Adherence to existing regulatory requirements would ensure that this impact would be less than significant.	No mitigation is required.	Less than Significant
Impact GEO-4. Future seismic events could result in liquefaction and lateral spreading of soils within the city. Development in the General Plan area and the Specific Plan area could be subject to liquefaction hazards. Compliance with the CBC would reduce liquefaction hazards. Proposed Health, Safety, and HazMat goals and policies apply to development facilitated by the proposed plans in hazard zones for liquefaction or lateral spreading of soils. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact GEO-5. Development facilitated by the 2040 General Plan and Specific Plan would occur on urbanized sites that are served by existing sanitation infrastructure. New development would not include septic systems. There would be no impact.	No mitigation is required.	No Impact
Impact GEO-6. Development facilitated by the 2040 General Plan and Specific Plan has the potential to impact paleontological resources. Impacts would be less than significant with mitigation incorporated.	 GEO-1 Protection of Paleontological Resources The City of Millbrae shall add the following Policy to the Recreation, Arts, and Culture Element of the 2040 General Plan under Goal RAC-4: Policy RAC-4.4 Protection of Paleontological Resources. The City shall require avoidance and/or mitigation for potential impacts to paleontological resources for any development that occurs within high sensitivity geologic units, whether they are mapped at the surface or occur at the subsurface. High sensitivity geology units include undivided sedimentary deposits and the Merced Formation. When paleontological resources are uncovered during site excavation, grading, or construction activities, work on the site will be suspended until the significance of the fossils can be determined by a qualified paleontologist. If significant resources are determined to exist, the paleontologist shall make recommendations for protection or recovery of the resource. 	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
Impact GEO-7. Development facilitated by the 2040 General Plan and Specific Plan would not have the potential to impact mineral resources. There would be no impact.	No mitigation is required.	No Impact
Greenhous Gas Emissions and Energy		
Impact GHG-1. Implementation of the 2040 General Plan and Specific Plan would be consistent with the Millbrae CAP, which meets State 2030 goals and provides goals to achieve progress towards but does not meet the State 2045 goal. Mitigation Measures GHG-1 and GHG-2 would result in CEQA GHG thresholds and a CAP Update; however, development facilitated by the 2040 General Plan and Specific Plan would not meet the 2045 goal until the CAP is updated. This impact would be significant and unavoidable.	 GHG-1 Adopt and Implement a CEQA GHG Emissions Threshold. The City shall include and implement a new 2040 General Plan policy under the Natural Resource Element to prepare, adopt, and implement a CEQA GHG Emissions threshold of significance. The City shall adopt the CEQA GHG Emissions threshold of significance by Spring 2023 for use in future CEQA GHG emissions analyses through 2030 consistent with the timeframe of the Millbrae 2020 CAP. In addition, upon completion of future CAP updates and as necessary, the City shall update the CEQA GHG Emissions threshold of significance and Millbrae CEQA GHG Checklist to be consistent with each CAP update. GHG-2 Update Millbrae 2020 CAP to Meet Carbon Neutrality by 2045. The City shall update the Millbrae 2020 CAP by Spring 2024 to outline how Millbrae will meet the State goal of carbon neutrality by 2045. Implementation measures in the updated CAP to achieve the 2045 goal may include, but are not limited to, the following: Develop and adopt Zero Net Energy requirements for new and remodeled residential and non-residential development; Develop and adopt a building electrification ordinance for existing and proposed structures; Expand charging infrastructure and parking for electric vehicles; Implement carbon sequestration by expanding the urban forest, participating in soil-based or compost application sequestration initiatives, supporting regional open space protection, and/or incentivizing rooftop gardens; and Implement policies and measures included in the California 2017 Climate Change Scoping Plan, such as mobile source strategies for increasing clean transit options and zero emissions vehicles by providing electric vehicle charging stations. 	Significant and Unavoidable
Impact GHG-2. The 2040 General Plan and Specific Plan would result in an increase of overall consumption of energy but are based on a land-use strategy and contain policies that would promote greater overall energy efficiency. Wasteful, inefficient, or unnecessary consumption of energy would not occur. impacts would be less than significant.	No mitigation is required.	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
Impact GHG-3. The 2040 General Plan and Specific Plan would be consistent with applicable energy efficiency goals and regulations, including relevant provisions of CALGreen and California Energy Code Title 24. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Hazards/Hazardous Materials and Wildfire		
Impact HAZ-1. Development facilitated by the 2040 General Plan and Specific Plan could result in the release of potentially hazardous materials, which may occur within 0.25 mile of a school. However, compliance with local, regional, State, and federal regulations related to hazardous materials would minimize the risk of releases and exposure to these materials. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact HAZ-2. Development facilitated by the 2040 General Plan and Specific Plan could result in development on sites contaminated with hazardous materials. However, compliance with applicable regulations relating to site remediation would minimize impacts from development on contaminated sites, resulting in a less than significant impact.	No mitigation is required.	Less than Significant
Impact HAZ-3. Development facilitated by the 2040 General Plan and Specific Plan could result in a safety hazard or excessive noise from San Francisco International airport for people residing or working in Safety Zones. As no feasible mitigation exists to reduce aircraft noise that is generated at an elevated position to an exterior area, this would be a significant and unavoidable impact.	No feasible mitigation is available.	Significant and Unavoidable
Impact HAZ-4. Development facilitated by the 2040 General Plan and Specific Plan would result in additional population and vehicle miles traveled in the city. However, the proposed plans would not result in changes to emergency evacuation routes nor would substantially increase roadway congestion such that the use of an evacuation route would be hindered. Impacts would be less than significant.	No mitigation is required.	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
Impact HAZ-5. Millbrae is not located within or near a Very High Fire Hazard Severity Zone. Compliance with applicable codes and regulations would reduce the risk of loss, injury, or death from wildfire for new developments encouraged by the 2040 General Plan and Specific Plan. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Hydrology and Water Quality		
Impact HYD-1. Implementation of the 2040 General Plan and Specific Plan would involve ground-disturbing activities during construction that could temporarily increase the potential for water quality to be affected by sedimentation or an accidental spill or release of hazardous materials. However, with adherence to applicable water quality standards and waste discharge requirements, impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact HYD-2. Development facilitated by the 2040 General Plan and Specific Plan would not pump water from the local groundwater basin and would not introduce new areas of impermeable surfaces such that the rates or patterns of surface water infiltration would be affected. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact HYD-3. Development facilitated by the 2040 General Plan and Specific Plan would not alter the course of a stream or river or add substantial new impervious areas such that surface runoff or flooding increases. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact HYD-4. Development facilitated by the 2040 General Plan and Specific Plan would not increase existing potential for inundation within flood hazard areas to occur and would not introduce substantial new pollutant sources that could potentially be released due to inundation. Impacts would be less than significant.	No mitigation is required.	Less than Significant

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

Impact	Mitigation Measure(s)	Residual Impact
Impact HYD-5. Development facilitated by the 2040 General Plan and Specific Plan would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Land Use/Planning and Population/Housing		
Impact LU-1. Implementation of the proposed 2040 General Plan and Specific Plan would maintain orderly development in Millbrae and would not physically divide an established community. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact LU-2. Implementation of the 2040 General Plan and the Specific Plan would be generally consistent with applicable land use plans, policies, or regulations adopted to avoid or mitigate environmental effects, such as ABAG/MTC's Plan Bay Area 2050. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact LU-3. Implementation of the proposed plans would facilitate the construction of new housing in Millbrae. Proposed development could result in an increase in population that would exceed ABAG population forecasts by 4.0 percent by 2040. However, the proposed plans are intended to accommodate and plan for population growth and includes policies to manage growth and development. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact LU-4. Development facilitated by the proposed plans would not result in the displacement of substantial numbers of housing or people. The proposed plans would facilitate the development of new housing in accordance with State and local hosing requirements, while preserving existing residential neighborhoods. Impacts would be less than significant.	No mitigation is required.	Less than Significant

Residual Impact

Significant and

Unavoidable

Impact

Noise

Impact NOI-1. Implementation of the 2040 General Plan and Specific Plan would temporarily generate increased noise levels potentially affecting nearby noise-sensitive land uses, introduce new on-site noise sources associated with residential and commercial land uses, and contribute to increases in traffic noise. Construction and stationary operational noise could exceed standards. This impact would be significant and unavoidable even with mitigation. **NOI-1 Conduct Construction Noise Analysis.** The City shall require development projects under the General Plan and Specific Plan subject to discretionary approval to evaluate potential construction noise impacts as part of the CEQA analysis on nearby sensitive uses and to implement any required mitigation measures to minimize impacts on these uses. Examples of mitigation measures to reduce construction noise include, but are not limited to:

- Equipment Staging Areas. Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receivers.
- Electrically-Powered Tools and Facilities. Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.
- Smart Back-up Alarms. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.
- Noise Disturbance Coordinator. The project applicant shall designate a "noise disturbance coordinator" responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of any noise complaint (e.g., starting too early, bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator shall be posted at the construction site.
- Additional Noise Attenuation Techniques. During the clearing, earth moving, grading, and foundation/conditioning phases of construction, temporary sound barriers shall be installed and maintained between the construction site and the sensitive receivers. Temporary sound barriers shall consist of sound blankets affixed to construction fencing or temporary solid walls along all sides of the construction site boundary facing potentially sensitive receivers.

NOI-2 Prepare and Implement Stationary Operational Noise Threshold The City shall include and implement a new 2040 General Plan policy under the Health, Safety, and Hazardous Materials Element to prepare, adopt, and implement operational stationary noise thresholds. The City shall adopt the stationary noise thresholds by Spring 2023 for use in future CEQA GHG emissions analyses through 2040.

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

Impact	Mitigation Measure(s) Specifically, the stationary noise thresholds for noise-sensitive land uses shall include the limits shown in Table 3.10-8. NOI-3 Conduct Stationary Operational Noise Analysis The City shall require future development projects that are subject to discretionary approval to evaluate potential stationary operational noise impacts as part of project-level CEQA analysis on nearby noise-sensitive uses and to implement any required mitigation measures to minimize impacts on these uses. Examples of mitigation measures to reduce stationary noise include, but are not limited to, operational restrictions, selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.	Residual Impact
Impact NOI-2. Implementation of the 2040 General Plan and Specific Plan near major transportation-noise sources (major roadways, rail, and airport) may experience noise levels that exceed the Millbrae General Plan noise land use compatibility standards. Proposed 2040 General Plan policies require analysis of future projects that may exceed such contours for exterior and interior noise compliance. impacts would be less than significant for roadway and rail noise sources. However, no feasible mitigation exists to reduce aircraft noise that is generated at an elevated position to an exterior area. this would be a significant and unavoidable impact.	No feasible mitigation is available for aviation noise.	Significant and Unavailable
Impact NOI-3. Construction of projects facilitated by the 2040 General Plan and Specific Plan would temporarily generate groundborne vibration. If these projects conduct pile driving, they could potentially exceed Caltrans vibration thresholds. Mitigation would minimize pile driving vibration impacts. However, construction vibration from pile-drivers may still disturb people or damage buildings beyond Caltrans thresholds. This impact would be significant and unavoidable even with mitigation.	NOI-4 Conduct Vibration Impact Assessment for Pile Driving. The City shall require future projects that would perform pile driving construction activities, as verified via piling driving construction applications, conduct a Vibration Impact Assessment prior to commencing construction on the project. The Vibration Impact Assessment shall provide the timeline, anticipated impacts, and mitigation to minimize the effects of vibration caused by onsite construction. Vibration levels shall not exceed the Caltrans vibration limits for building damage and human annoyance as shown in the tables below:	Significant and Unavoidable

Mitigation Measure(s)

Residual Impact

Vibration Damage Potential Criteria

Type of Situation	Limiting Velocity (in/sec PPV)
Historic sites or other critical locations	0.1
Residential buildings, plastered walls	0.2-0.3
Residential buildings in good repair with gypsum board walls	0.4-0.5
Engineering structures, without plaster	1.0-1.5
in/sec = inches per second, PPV = peak particle velocity	

Vibration Damage Potential

	Vibration Level (in/sec PPV)	
Human Response	Transient Sources	Continuous/Frequent Intermittent Sources
Severe	2.0	0.4
Strongly perceptible	0.9	0.10
Distinctly perceptible	0.25	0.04
Barely perceptible	0.04	0.01
in/sec = inches per second, PPV = peak particle velocity		

Examples of mitigation measures to reduce the effects of pile driving vibration include, but are not limited to:

- Construction Scheduling. Schedule pile driving construction activities to hours with the least potential to affect nearby institutional, educational, and office uses.
- Notifications. Notify neighbors of scheduled construction activities that would generate vibration. Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receptors.

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

Impact	Mitigation Measure(s)	Residual Impact
Public Services & Recreation		
Impact PS-1. Development facilitated by the 2040 General Plan and the Specific Plan would increase the population of Millbrae, generating additional need for fire protection services. However, compliance with the 2040 General Plan and Specific Plan policies would result in impacts related to the need for new or altered fire facilities that are less than significant.	No mitigation is required.	Less than Significant
Impact PS-2. Development facilitated by the 2040 General Plan and the Specific Plan would increase population in Millbrae, generating additional need for police protection services. However, compliance with 2040 General Plan and Specific Plan policies would result in impacts related to the need for new or altered police facilities that are less than significant.	No mitigation is required.	Less than Significant
Impact PS-3. Development facilitated by the 2040 General Plan would result in an increase in population of school-aged children in Millbrae. This would increase demand for school services and potentially create the need for new school facilities. However, compliance with 2040 General Plan policies and payment of school impact fees would result in impacts related to the need for new or altered school facilities that are less than significant.	No mitigation is required.	Less than Significant
Impact PS-4. Development facilitated by the 2040 General Plan and the Specific Plan would result in an increase in the City's population. This would increase demand for and use of parks and potentially create the need for new or altered park facilities. However, compliance with 2040 General Plan and Specific Plan policies would result in impacts related to the need for new or altered parks or recreational facilities that are less than significant.	No mitigation is required.	Less than Significant

Residual Impact

Impact PS-5. Development facilitated by the 2040 General Plan would result in an increase in the City's population. This would increase demand for public facilities and potentially create the need for new public facilities, including libraries. However, compliance with 2040 General Plan policies would result in impacts related to need for new or altered public facilities that are less than significant.	No mitigation is required.	Less than Significant
Transportation and Traffic		
Impact TRA-1. Implementation of the 2040 General Plan and Specific Plan could conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. impacts would be less than significant with mitigation.	 TRA-1 Prepare and Implement Construction Traffic Management Plans. Prior to issuance of building permits, the contractor for an individual development project that requires off-site staging, lane closures, or substantial hauling of cut and fill on a local street (i.e., not under Caltrans' jurisdiction) shall prepare a Construction Traffic Management Plan that includes measures such as, but not limited to, the following items, as deemed necessary by the City. Provide a temporary traffic signal, if necessary Project Staging Plan to maximize on-site storage of materials and equipment A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak-hours; lane closure proceedings; signs, cones, and other warning devices for drivers; and designation of construction access routes Permitted construction hours 	Less than Significant
	 Location of construction staging Identification of parking areas for construction amplexees, site visitors, and 	
	 Identification of parking areas for construction employees, site visitors, and inspectors, including on-site locations 	
	 Provisions for street sweeping to remove construction related debris on public streets 	
Impact TRA-2 . Implementation of the 2040 General Plan and Specific Plan would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). impacts would be significant and unavoidable.	 TRA-2 Prepare and Implement a TDM Plan with TDM Programs. The City shall require preparation and implementation of TDM programs for employment-oriented land use development projects facilitated by the proposed plans that do not meet future VMT screening criteria adopted by the City. The screening criteria shall be in concert with those recommended by OPR, including the following: Small projects – projects consistent with a Sustainable Communities Strategy and local general plan that generate or attract fewer than 110 trips per day. 	Significant and Unavoidable

Mitigation Measure(s)

Impact	 Mitigation Measure(s) Projects near major transit stops – certain projects (residential, retail, office, or a mix of these uses) proposed within ½ mile of an existing major transit stop or an existing stop along a high-quality transit corridor. Projects in low VMT areas – residential and office projects that incorporate similar features (i.e., density, mix of uses, transit accessibility) as existing development in areas with low VMT will tend to exhibit similarly low VMT. If no screening criteria are met, then the TDM program must be sufficient to reduce VMT below the Citywide non-residential VMT per employee threshold of 16.5. 	Residual Impact
Impact TRA-3. Implementation of the 2040 General Plan and Specific Plan would not substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact TRA-4. Implementation of the 2040 General Plan and Specific Plan would not have the potential to result in inadequate emergency access. This impact would be less than significant.	No mitigation is required.	Less than Significant
Utilities and Service Systems		
Impact UTL-1. Development under the 2040 General Plan and Specific Plan would increase demand for water, wastewater, stormwater, and telecommunications services. However, development and relocation facilitated by the proposed plans, if applicable, would occur in developed areas of Millbrae where such facilities exist and relocation. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact UTL-2. Development facilitated by the 2040 General Plan and Specific Plan would increase demand for water supply. However, with adherence to the 2040 General Plan and specific plan policies, water supplies would be adequate to support future development. Impacts would be less than significant.	No mitigation is required.	Less than Significant

Impact	Mitigation Measure(s)	Residual Impact
Impact UTL-3. Development projected by the proposed plans would increase demand for wastewater treatment. However, the existing wastewater treatment plant has sufficient capacity for future development, and the 2040 General Plan contains policies to ensure treatment is adequate. Impacts would be less than significant.	No mitigation is required.	Less than Significant
Impact UTL-4. Development facilitated under the 2040 General Plan and Specific Plan would slightly increase the volume of solid waste generated in Millbrae. However, existing infrastructure that serves the city, as well as policies within the 2040 General Plan, would ensure that the City has adequate capacity to accept the increase in solid waste and comply with federal, State, and local management reduction regulations. Impacts would be less than significant.	No mitigation is required.	Less than Significant

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This document is a programmatic Environmental Impact Report (EIR) that assesses the potential environmental impacts associated with implementation of 1) an update to the Millbrae General Plan, including related zoning amendments (collectively referred to in this EIR as the "2040 General Plan"), as well as 2) the Downtown and El Camino Real Specific Plan, including related zoning amendments (all together referred to in this EIR as the "Specific Plan"). A programmatic EIR evaluates the effects of broad proposals or planning-level decisions such as the proposed plans with a level of detail sufficient to allow informed decisions among planning-level alternatives and to develop broad mitigation strategies.

This chapter discusses (1) the project and EIR background; (2) the legal basis for preparing an EIR; (3) the scope and content of the EIR; (4) the lead, responsible, and trustee agencies; and (5) the environmental review process required under the California Environmental Quality Act (CEQA). The 2040 General Plan and the Specific Plan (sometimes referred to in this EIR as the "proposed plans") are described in detail in Chapter 2, *Project Description*.

1.1 EIR Purpose, Type, and Authority

1.1.1 Regulatory Purpose

The 2040 General Plan and the Specific Plan require the discretionary approval of the City of Millbrae City Council; therefore, the proposed plans are subject to the environmental review requirements of CEQA. In accordance with Section 15121 of the *CEQA Guidelines* (California Code of Regulations, Title 14), the purpose of an EIR is to serve as an informational document that:

"...will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."

As such, the regulatory purpose of this EIR is to disclose the environmental impacts, including any significant effects, of the proposed plans, identify ways to avoid or reduce environmental impacts through planning design or environmental mitigation measures, consider feasible alternatives to the proposed plans, and integrate public participation and input into the overall planning process.

1.1.2 EIR Type

This EIR has been prepared as a programmatic EIR pursuant to Section 15168 of the *CEQA Guidelines*. A programmatic EIR is appropriate for planning documents or other long-term programs. As stated in the *CEQA Guidelines*:

"A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:

- 1) Geographically,
- 2) As logical parts in the chain of contemplated actions;
- 3) In connections with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or

4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

This EIR is programmatic in nature with a broad comprehensive evaluation to cover the actions taken under these longer-range plans. Some future development projects may require additional project-specific environmental review, given that this program EIR analysis is not parcel- or project-specific.

1.1.3 Legal Authority

This EIR is intended to serve as an informational document for the public and City of Millbrae decision makers. The approval process will include public hearings before the City Council to consider certification of a Final EIR and adoption of the proposed plans. Adoption of the proposed plans may not be considered until this EIR has first been considered by the decision makers and certified by the approving body, in this case the Millbrae City Council.

1.2 Environmental Impact Report Background

1.2.1 Notice of Preparation

The City of Millbrae distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on December 3, 2021 and ending on January 7, 2022. In addition, the City held an EIR Scoping Meeting on December 16, 2021. The meeting, held from 6:00 PM to 7:00 PM, was aimed at providing information about the proposed plans to members of public agencies, interested stakeholders, and residents/community members, and at receiving input on the scope of the environmental review. The meeting was held virtually via Zoom due to ongoing COVID-19 pandemic health and safety precautions.

1.2.2 Comments Received in Response to the NOP

In addition to a few verbal comments received during the EIR Scoping Meeting, the City received written scoping comment letters from seven agencies, two organizations, and two individuals in response to the NOP during the public review period. The NOP is included in Appendix A of this EIR, along with the written NOP responses that were received. Table 1-1 summarizes the content of the letters and verbal comments and where the issues raised are addressed in this EIR.

Commenter	Comment/Request	Where It Was Addressed
Agency Comments		
California Department of Transportation (Caltrans)	Address travel demand and include travel demand reduction strategies and multimodal improvements.	Comments relevant to CEQA are addressed in Section 3.12, <i>Transportation</i> .
	In accordance with the City's adopted Vehicle Miles Traveled (VMT) policy, justify why the project would be exempt with the City's VMT policy or provide a detailed VMT analysis in the environmental document which would	-

Commenter	Comment/Request	Where It Was Addressed
	include a VMT analysis pursuant to the City's guidelines, a schematic illustration of walking, biking, and auto conditions at the study area roadways, and primary and secondary effects on pedestrians, bicycles, travelers with disabilities, and transit performance.	
	States that plan areas are identified as a Close In Community Center where community design is moderate and regional accessibility is strong. Recommends the preparation of a Transportation Demand Management program to reduce VMT and greenhouse gas emissions	
	Encourages adoption of California Air Pollution Control Officers Association measures to reduce regional VMT.	
	States that transportation projects funded or overseen by Caltrans shall also provide complete streets facilities.	
	Recommends that a sufficient allocation of fair share contributions toward multi- modal and regional transit improvements be used to mitigate cumulative impacts	Comments relevant to CEQA are addressed in the Transportation Impact Assessment prepared by Kittelson and Associates and in Section 3.12, <i>Transportation</i> .
	Requires that any Caltrans facilities impacted by the project meet American Disabilities Act Standards.	
City/County Association of Governments of San Mateo County	States that the City of Millbrae lies within both Airport Influence Area (AIA) A (the Real Estate Disclosure Area) and AIA B (the Policy/Project Referral Area) for San Francisco International Airport.	Comments relevant to CEQA are addressed in Section 3.7, <i>Hazards and Hazardous Materials</i> <i>and Wildfire</i> . Comments are also addressed in Section 3.9, <i>Land Use Planning, Population, and</i> <i>Housing</i> .
	Recommends the EIR analyze the proposed policies in the General Plan would be consistent with the 2012 Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.	
	States that the land use policy amendments of the General Plan would require formal review by C/CAG Airport Land Use Committee and C/CAG for a determination of consistency with the SFO ALUCP prior to local agency action.	
California High Speed Rail Authority	Encourages coordination with the California High Speed Rail Authority for station modifications to support blended rail service in Millbrae and to consider how to introduce right-of-way preservation into the General Plan update and environmental analysis.	Comments relevant to CEQA are addressed in Section 3.12, <i>Transportation</i> .

Commenter	Comment/Request	Where It Was Addressed
	Suggests incorporating the analysis of the San Jose DEIR/DEIS and subsequent Revised DEIR/Supplemental DEIS (https://hsr.ca.gov/programs/environmen tal-planning/project-section- environmental-documents-tier-2/san- francisco-to-san-jose-project-section- draft-environmental-impact-report- environmental-impact-statement/) into the Millbrae General Plan and Downtown and El Camino Real Specific Plan analyses.	
	Requests that the City consider incorporating planned improvements for high-speed rail service at Millbrae Station into the General Plan Update, including track and platforms, station facilities, and station access improvements along El Camino Real.	
	Requests the analysis of consistency with state and regional plans, multi-modal transportation effects of El Camino Real streetscape improvements and land use change on transit and active transportation access to and from the station, air quality and greenhouse gas and resilience benefits associated with higher density development with access to rail transit services at Millbrae Station, cumulative impacts of land use changes on station access, adequacy of public services and utilities to serve the station area.	
Native American Heritage Commission (NAHC)	States that the proposed project is subject to the requirements and provisions under Senate Bill 18 (SB 18) and Assembly Bill 52 (AB 52) for tribal cultural resources.	Consultation required by SB 18 and AB 52 was carried out by the City of Millbrae. Related topics relevant to CEQA are discussed in Section 3.4, <i>Cultural and Tribal Cultural Resources</i> , of this EIR.
San Mateo County Transit District (SamTrans)	States that SamTrans is currently working on the El Camino Real Bus Speed and Reliability Study (ECR BSR Study) and expresses support for the bus stop design outlined in the Final Vision of the Preliminary Draft Streetscape Plan.	Comments relevant to CEQA are addressed in Section 3.12, <i>Transportation</i> .
	Expresses that the change from in-lane bus stops to pull-out stops suggested in the December 2, 2021 Millbrae City Council and Planning Commission Joint Study would not best serve transit in the Millbrae community. Encourages the Streetscape Plan to keep the in-lane stop design.	-

Commenter	Comment/Request	Where It Was Addressed
	Requests that the EIR consider the impact of bus top design alternatives on bus travel time, reliability, and dwell time, and evaluate how the alternatives affect the mobility of people rather than vehicles.	
San Francisco International Airport	States that the City of Millbrae is within Airport Influence Area B and that the portion of the City near Manor Park is located within the 65 decibel Community Noise Equivalent Contour.	Comments relevant to CEQA are addressed in Section 3.10, <i>Noise</i> .
	States that the Millbrae Station Area Plan and the Downtown and El Camino Real plan areas are within Safety Compatibility Zones 1,2,3, and 4. Suggests that detailed descriptions of compatible and incompatible land uses in each Safety Zone be incorporated into Millbrae's General Plan, Specific Plan, and associated zoning updates.	-
	States that the critical airspace surfaces within the City are 100 – 800 feet above mean sea level as defined from the origin of the North American Vertical Datum of 1988. Recommends that elevations rather than heights above ground level are used to reference elevation allowances in the Plans and the Zoning Code.	Comments relevant to CEQA are addressed in Section 3.7, Hazards and Hazardous Materials and Wildfire
	Recommends the incorporation of compatibility with the ALUCP in the General Plan Update, the Downtown and El Camino Real Specific Plan, and associated Zoning Code amendments.	Comments relevant to CEQA are addressed in Section 3.9, Land Use Planning, Population, and Housing
San Francisco Public Utilities Commission	Recommends that the EIR analyze potential impacts to public utilities within the El Camino Real public right-of-way, including SFPUC water transmission pipelines and provide mitigation to avoid damaging utility lines from the excessive load of mature trees planted directly over utilities; avoid precluding access to utility lines for maintenance and repairs by planting trees over, or near utility lines; and avoid damaging the protective, anti- corrosion coating to utility pipelines from the roots of trees planted nearby.	Comments relevant to CEQA are addressed in Section 3.13, Utilities and Service Systems.
	States that the SFPUC fee ownership is not identified and the following items on the proposed bike path: SFPUC parcels 16, 17, 18, 19, and 20	
	slated for a bike path are currently used for staff parking, staging, and equipment storage. The area is also already impacts with proposed right-	-

Commenter	Comment/Request	Where It Was Addressed
	of-way (ROW) sale to JPB-Caltrain for their electrification project.	
	 The SFPUC San Francisco International Airport Pipeline crosses SFPUC Parcel No. 18 	
	 An existing bike path (Monterey Street) runs parallel to the Caltrain ROW, crossing SFPUC Parcel No. 19 and runs within Parcel No. 20. This is an unauthorized existing improvement 	
	 The Magnolia Street bike path has a gap in the ROW for the whole CSPL #3 within Magnolia 	
	Notes that SFPUC has two pipelines within El Camino Real	
	Requests additional information regarding the proposed connector from Helen Drive to Meadow Glen and stops in front of SFPUC Millbrae Yard	
	Requests additional street definition within the Millbrae Yard property boundary.	
	Requests additional information on how the downtown and corridor mixed use represented on Millbrae Yard would differ from current zoning	
	Requests additional information for how the proposed promenade on El Camino Real would affect SFPUC infrastructure	
	Requires that all lighting within El Camino Real be reviewed by SFPUC	-
Organization Comme	ents	
San Francisco Baykeeper	Encourages the City to study coastal groundwater dynamics in the context of urban and coastal zone management.	Comments relevant to CEQA are addressed in Section 3.8, <i>Hydrology and Water Quality</i> .
	Recommends the preparation of a detailed map of shallow groundwater aquifers (pools) throughout Millbrae to identify previously unknown hotspots for flooding and reduce risk of flooding	
Sierra Club Loma Prieta Chapter	Recommends that the plan explain how it will achieve the State's VMT targets	Comments relevant to CEQA are addressed in Section 3.12, <i>Transportation</i> .
	Recommends that the plan explain how it will improve the health of the transit district (SamTrans).	
	Suggests the incorporation of more affordable housing, providing every household with SamTrans and Caltrains passes, congestion pricing parking, and	

Commenter	Comment/Request	Where It Was Addressed
	providing first and last mile options through shared micro mobility.	
	Suggests priced parking on El Camino Real and in the 0.5-mile surrounding neighborhood with residential parking permits.	
	Requests additional information on how the goals of the Grand Boulevard would be achieved.	
	Suggests enhancing pedestrian priority in the 0.5-mile radius around the BART station.	
	Requests additional information on how air pollution and water pollution from runoff would be reduced in line with state goals.	Comments relevant to CEQA are addressed in Section 3.2, Air Quality, Section 3.6, Greenhouse Gas Emissions and Energy, and in Section 3.8, Hydrology and Water Quality.
	Suggests including all electric passive construction, walking and biking priority to reduce lifetime emissions, and meeting the energy waste and water needs on site via microgrids.	
	Requests additional information on how the city would be safer to walk and bike so mode share increases to offset greenhouse gases from transportation. Suggests separated bikeways and Slow	Comments relevant to CEQA are addressed in Section 3.12, <i>Transportation</i> .
	Suggests separated bikeways and slow	
Individual Comments		
David Crabbe	Suggests the inclusion of a Health Element in the General Plan.	This comment is on the project rather than the environmental scope so requires no further response but will be considered by the City's decision makers as part of the plan adoption process.
	Suggests that all biotech development within the City of Millbrae be considered using Biological Safety Levels and determining what would be acceptable to the City from a public safety perspective	Comments relevant to CEQA are addressed in Section 3.7, <i>Hazards and Hazardous Materials</i> & <i>Wildfire</i>
Nathan Chan	Suggests that the EIR evaluate whether buses should stop out of the travel lane or in the travel lane and should consider impacts to bus travel times, dwell times, and reliability; impacts to driver travel times and safety; impacts to bicycle safety; a comparison of the number of people impacted in all three cases	Comments relevant to CEQA are addressed in Section 3.12, <i>Transportation</i> .
	Suggests the EIR evaluate whether bicycle lanes on El Camino Real should be parking protected or curbside and shall analyze bicycle safety and driver safety.	

Commenter	Comment/Request	Where It Was Addressed
	Requests additional information on how land use and streetscape changes would affect financial viability and ridership of SamTrans, Caltrain, and BART.	This comment is on the project rather than the environmental scope so requires no further response but will be considered by the City's decision makers as part of the plan adoption process.
	Requests an evaluation of the City Council's decision to remove the Chadbourne crossing of El Camino Real.	This comment is on the project rather than the environmental scope so requires no further response but will be considered by the City's decision makers as part of the plan adoption process.
	Provides strategies and actions from the Greenbelt Alliance's Resilience Playbook and suggests that they be considered in the EIR.	Comments relevant to CEQA are addressed in Section 3.9, <i>Land Use Planning, Population, and Housing.</i>
Scoping Meeting Comn	nents	
<u>Topic</u>	Comment Request	Where it Was Addressed
Traffic	Analyze VMT and associated greenhouse gas emissions	Comments relevant to CEQA are addressed in Section 3.6, <i>Greenhouse Gas Emissions and Energy</i> and in Section 3.12, <i>Transportation</i> .
Hydrology & Water Quality	Analyze sea level rise related risks, especially for areas east of El Camino Real.	Comments relevant to CEQA are addressed in Section 3.8, <i>Hydrology and Water Quality</i> .
Public Services and Utilities	Analyze water supply needs related to additional land uses and housing	Comments relevant to CEQA are addressed in Section 3.13, Utilities and Service Systems.
	Analyze school enrollment needs as the City population and housing grows	Comments relevant to CEQA are addressed in Section 3.11, Public Services and Recreation.
Miscellaneous	Analyze Housing Costs	This comment is on the project rather than the environmental scope so requires no further response but will be considered by the City's decision makers as part of the plan adoption process.

1.3 Scope and Adequacy

1.3.1 Scope and Sources

This EIR addresses impacts related to all topics listed in 2022 CEQA Guidelines Appendix G.

The alternatives chapter of this EIR (Chapter 6) was prepared in accordance with Section 15126.6 of the *CEQA Guidelines* and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the project while feasibly attaining most of the basic project objectives. In addition, the alternatives chapter identifies the "environmentally superior" alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required "No Project" alternative and three alternative development scenarios for the plan areas.

In preparing this EIR, use was made of pertinent City policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. References are included as footnote citation references where relevant throughout this EIR document.

1.3.2 Content Adequacy

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the *CEQA Guidelines* provides the standard of adequacy on which this document is based. The *Guidelines* state:

"An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure."

1.4 Lead, Responsible, and Trustee Agencies

1.4.1 Lead Agency

The CEQA Guidelines define lead, responsible and trustee agencies. The City of Millbrae is the lead agency for the project because it holds principal responsibility for approving the project.

1.4.2 Responsible Agencies

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the proposed plans. There are no responsible agencies under CEQA for the proposed plans.

1.4.3 Trustee Agencies

A trustee agency refers to a State agency having jurisdiction by law over natural resources affected by a project. There are no trustee agencies for the proposed plans.

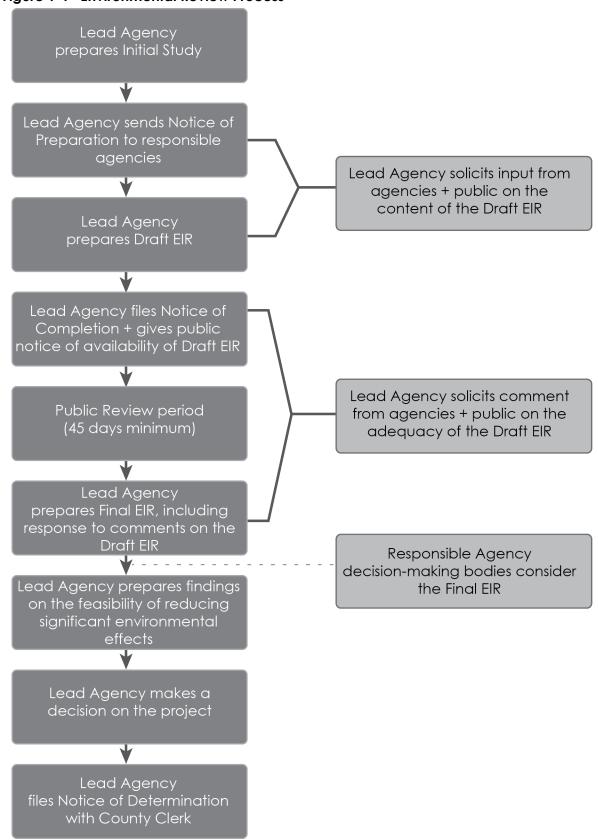
1.5 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

- Notice of Preparation (NOP). After deciding that an EIR is required, the lead agency (City of Millbrae) filed a NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; *Public Resources Code* Section 21092.2). The NOP for this EIR was posted in the San Mateo County Clerk's office for 30 days. In addition, the City of Millbrae held an EIR Scoping Meeting on December 16, 2021.
- Draft EIR. This Draft EIR contains the following required components: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing. and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible change (CEQA Guidelines Sections 15120 through 15132).

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

- 3. Notice of Completion (NOC). The lead agency must file a NOC with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the NOC in the County Clerk's office for 30 days (Public Resources Code Section 21092) and send a copy of the NOC to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site (not appropriate for citywide or plan-level efforts such as the proposed plans); and c) direct mailing to owners and occupants of contiguous properties (not appropriate for citywide or plans). The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (*Public Resources Code* Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (*Public Resources Code* Section 21091). Given such requirements, this Draft EIR will be noticed via publication in a newspaper of general circulation and involve a 45-day public review and comment period.
- 4. **Final EIR.** A Final EIR must include the following components: a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments (*CEQA Guidelines* Section 15132).
- 5. **Final EIR Certification.** Prior to making a decision on the proposed plans, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency (i.e., Millbrae City Council); and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving the proposed plans (*CEQA Guidelines* Section 15090).
- 6. Lead Agency Plans Decision. The lead agency may a) disapprove the proposed plans because of its significant environmental effects; b) require changes to the proposed plans to reduce or avoid significant environmental effects; or c) approve the proposed plans despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
- 7. Findings/Statement of Overriding Considerations. For each significant impact of the proposed plans identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the proposed plans has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the proposed plans are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or proposed plans alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a plan or project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
- 8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects (*CEQA Guidelines* Section 15097).
- 9. Notice of Determination (NOD). The lead agency must file a NOD after deciding to approve a plan or project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (*Public Resources Code* Section 21167[c]).



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2 Project Description

As part of an overarching planning process, the City of Millbrae (City) proposes to adopt:

- 1) an update to the City General Plan, including six respective City General Plan elements exclusive of the Housing Element that is being prepared at a later date and including associated zoning amendments (collectively referred to in this EIR as the 2040 General Plan); and
- 2) the Downtown and El Camino Real Specific Plan, including associated zoning amendments (collectively referred to in this EIR as the Specific Plan).

The 2040 General Plan serves as the long-term blueprint for redevelopment across the City (the General Plan area), and the Specific Plan provides a roadmap for growth within the Downtown district and El Camino Real corridor (the Specific Plan area). This chapter provides an overview of the plan area locations and setting as well as the proposed plans' objectives, land use components, zoning, policies, and infrastructure. Intended uses of this EIR by agencies with permitting and approval authority over the proposed plans, in addition to required permits and approvals, are also discussed.

2.1 Plan Areas Location and Setting

2.1.1 Regional Location

The City of Millbrae is located on the northern San Francisco Peninsula, 15 miles south of San Francisco and immediately west of the San Francisco International Airport. Millbrae occupies 3.28 square miles of northern San Mateo County and is part of the nine-county-area known as the San Francisco Bay Region (see Figure 2-1 and Figure 2-2). Neighboring areas include the City of San Bruno to the north, the City of Burlingame to the south, watershed lands within San Mateo County that are owned by the City and County of San Francisco to the west, and the San Francisco International Airport and San Francisco Bay (Bay) to the east. Principal regional transportation facilities serving Millbrae are U.S. Highway 101, Interstate Highway 280 (Junipero Serra Freeway; I-280), State Route 82 (El Camino Real; SR-82), the Union Pacific Railroad, Caltrain, Bay Area Rapid Transit (BART), and the San Francisco International Airport. Regional bus service is also provided by the San Mateo County Transit District (SamTrans).

2.1.2 Local Setting

The City is characterized as a suburban residential community. More than 50 percent of Millbrae's land is occupied with residential uses, primarily single-family. Commercial uses account for less than 10 percent, with another 10 percent related to utility uses. About 17 percent of the land is occupied by streets and highways, and 4 percent is vacant. Millbrae's topography ranges from the flatlands closer to the San Francisco Bay (roughly 7 feet above mean sea level) to the lower portions of the City and County of San Francisco watershed lands toward the center of the San Francisco Peninsula (about 500 feet above mean sea level). Three parallel watersheds (Lomita Creek, Greenhills Creek, and Millbrae Creek Watersheds) drain the upper slope areas into canals that empty into the San Francisco Bay. Millbrae's climate is influenced by both coastal and Bayside weather. The Santa Cruz Mountains partially protect Millbrae from coastal weather, although seasonal fog and wind is common at higher elevations; lower elevations have milder conditions with some maritime

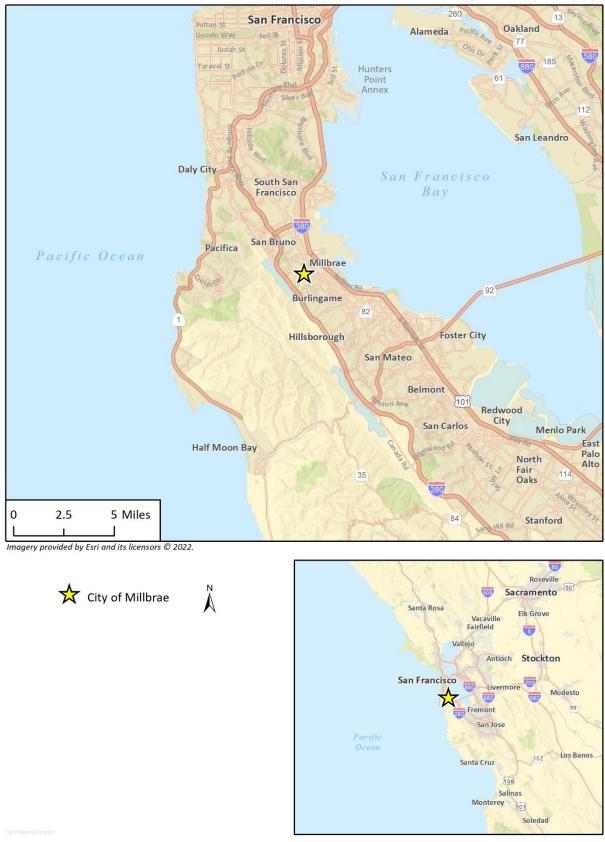
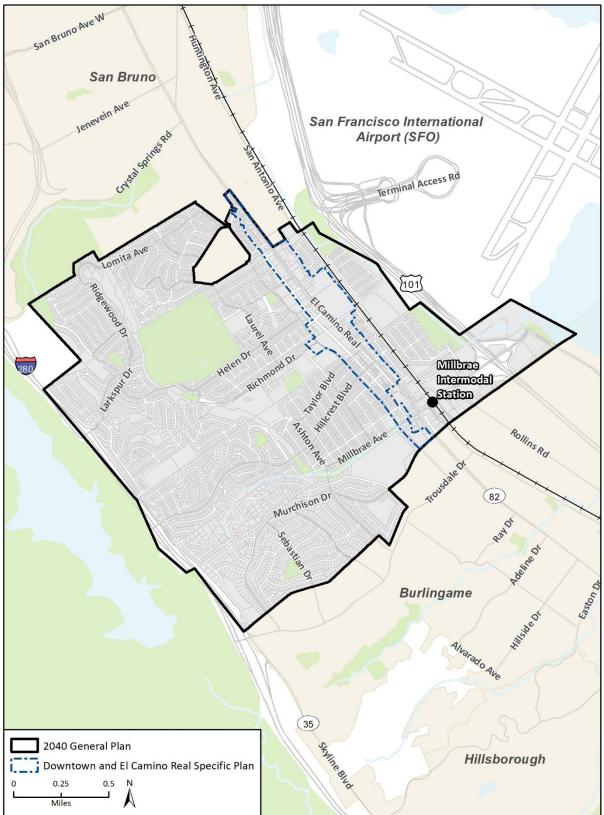


Figure 2-1 Regional Location

Figure 2-2 Plan Areas Location



Imagery provided by Microsoft Bing and its licensors © 2022. Source: City of Millbrae, 2017; ABAG, 2017; Mintier Harnish, 2018.

influences from the Bay. A temperature inversion, where warm dry air overrides cool marine air and traps air pollutants close to the ground, generally occurs during late summer and fall.

2.2 Existing Plan Area Characteristics

2.2.1 General Plan Area

The 2040 Millbrae General Plan area (General Plan area) covers the 3.28 square miles (or 2,098.51 acres) of land within the City of Millbrae limits (see Figure 2-2). Approximately 22,509 people live within the General Plan area, representing a density of about 6,863 people per square mile. In addition, 8,637 housing units exist within the General Plan area. ¹

2.2.2 Specific Plan Area

The Downtown and El Camino Real Specific Plan area (Specific Plan area) covers 0.23 square mile (or 144.20 acres) of land immediately parallel to El Camino Real (see Figure 2-2). The Specific Plan area stretches from the City of Millbrae limits at Santa Lucia Avenue on the north to Murchison Drive on the south. The Specific Plan area also extends to parts of Broadway and Magnolia Avenue to the west as well as San Anselmo Avenue and the Millbrae Station Area Specific Plan boundary to the east. Approximately 3,425² people live within the Specific Plan area, representing a density of about 787 people per square mile. In addition, 1,250 housing units and 330,000 gross square feet of non-residential uses exist within the Specific Plan area broken down as shown in Table 2-1:

Existing Specific Plan Area Land Use	Existing Specific Plan Area Units or GSF
Total Residential Units	1,250 units
Total Non-residential gsf	330,000 gsf
Hotel gsf	130,000 gsf (220 rooms)
Office gsf	50,000 gsf
General Commercial gsf	85,000 gsf
Restaurant gsf	65,000
gsf = gross square feet	

Table 2-1 Existing Specific Plan Area Summary

2.3 Existing Land Use Designations and Zoning

2.3.1 Land Use Designations

The current Millbrae General Plan Land Use Element establishes nine separate land use designations to provide a mixture of land uses for the City. The existing City of Millbrae Land Use Designations Map is shown in Figure 2-3.

¹ California Department of Finance (DOF). 2022. E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011-2021, with 2010 Benchmark. Available: https://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/. Accessed February 22, 2 2022.

² Based on CDOF persons per household rate of 2.74 persons. Calculation: 1,250 housing units x 2.74 persons per household. Source: CDOF. 2022. E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011-2021, with 2010 Benchmark. Available: https://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/. Accessed February 22, 2022.

2.3.2 Zoning

The current Millbrae Zoning Code establishes thirteen separate zoning categories to provide a mixture of permitted land use densities, heights, and types for the City. The existing City of Millbrae Zoning Map is shown in Figure 2-4.

2.4 Plan Objectives

The City of Millbrae has the following objectives for the implementation of the proposed plans:

2.4.1 General Plan

The City's General Plan objectives are as follows:

- Promote the revitalization of El Camino Real into a "grand boulevard" that creates a welcoming gateway into Millbrae
- Improve pedestrian and bicycle mobility and enhance the streetscape along the El Camino Real corridor to create an inviting pedestrian environment
- Encourage transit-oriented, residential, and mixed-use developments along El Camino Real that create an exciting place for people to live, work, shop, and play
- Create a physical space and the infrastructure to captivate a mix of businesses that serve the range of resident needs and attract visitors
- Foster investments in public spaces that elevate downtown as an urban village thriving with community activity
- Support the preservation and broadening of the existing housing stock, while encouraging innovative housing types and preserving bay views
- Provide a safe and complete transportation network that meets the needs of various users Focus on smart, safe, and seamless transportation improvements that encourage walkability and bikeability and increase accessibility between neighborhoods, downtown, and the intermodal station
- Enhance Millbrae's character and reputation by creating vibrant places that bring community members together and draw visitors from the region
- Encourage Millbrae to remain an inclusive urban community with strong civic pride by improving and creating new public gathering spaces through public art, local landmarks, safety measures, and park or plaza improvements
- Encourage walking, biking, and public transportation and reduce automobile dependence, noise, and harmful air pollutants
- Strive to achieve zero waste and expanded electrical infrastructure, tertiary wastewater treatment, and urban forest as well as promote the efficient use of natural resources including water, energy, and land, to reduce impacts on regional watersheds
- Protect the health and safety of residents and support a high-quality living environment by maintaining infrastructure, services, and programs that meet the needs of the community
- Support increased use of technology to improve the equitable, transparent, and timely delivery
 of City services



Figure 2-3 Existing Millbrae Land Use Designations Map

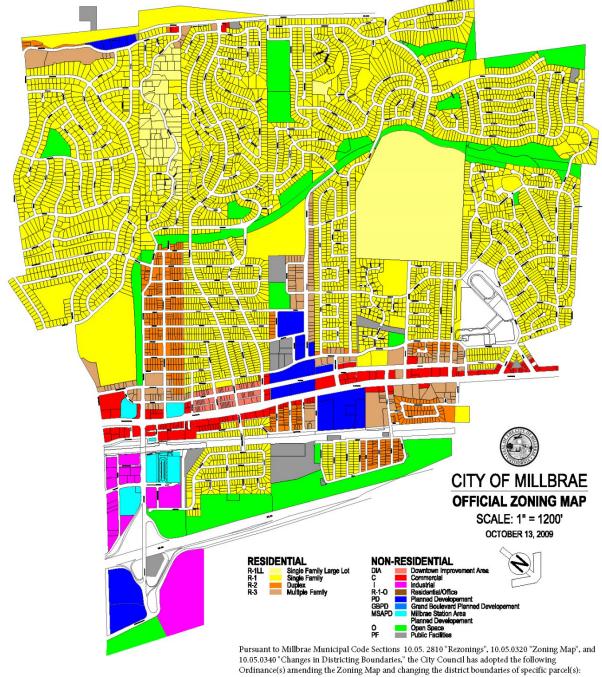


Figure 2-4 Existing Millbrae Zoning Map

Ordinance No. 749 Adopted on February 24, 2015 amending the Zoning Code and the Zoning Map for five parcels.

- Foster economic growth by cultivating a diversity of businesses based on innovation, technology, and local entrepreneurship that provide high-paying jobs and increase the tax base
- Emphasize the highest and best use of land for economic development, business retention, entrepreneurship, and growth in life sciences, retail, local services, other technology sectors
- Encourage healthy lifestyles for residents and visitors by increasing opportunities for physical activity, availability of nutritious foods, quality education, realistic living wages, access to affordable healthcare and childcare, options for affordable housing, clean air and water, and a safe environment that promotes walking and biking
- Encourage active living by elevating recreational programming for persons of various ages and abilities, enhance parks and recreation facilities, and improve bike and pedestrian connections throughout the City and into neighboring cities

2.4.2 Specific Plan

The City's Specific Plan objectives are as follows:

- Transform the primary areas of business and commerce within Millbrae into vibrant and connected mixed-use centers of cultural and economic activity
- Enhance quality of life by providing a roadmap for future growth and investment to create an exciting place for people to live, work, shop, and visit
- Emphasize transit-oriented, mixed-use development to provide a purposeful mix of housing, restaurants, retail, hotels, offices, and entertainment uses
- Provide the overarching policy framework and development regulations that are necessary to achieve the plan's vision

2.5 Proposed Plans Components

Table 2-2 shows the overall components summary for the 2040 General Plan and Specific Plan and is followed by more-detailed descriptions of the proposed plans. Table 2-2 also indicates the net change from City of Millbrae existing permitted development to proposed City of Millbrae permitted development related to implementation of the proposed plans; this EIR analyzes the net change in terms of potential physical environmental impacts.

	Proposed	Net Change from Existing to Proposed
Total Maximum Residential Units	3,130	1,880
Total Maximum Non-residential gsf	966,000	636,000
Hotel gsf	330,000 (460 rooms)	200,000 (240 rooms)
Office gsf	155,000	105,000
General Commercial gsf	310,000	225,000
Restaurant gsf	225,000	106,000

Table 2-2 Proposed Plans Components Summary

2.5.1 2040 General Plan

With limited opportunities for new development in Millbrae, the 2040 General Plan emphasizes infill and reuse development within the City limits, encourages higher-density and mixed-use projects where appropriate, and supports development that compliments the existing natural and built environment. Future development would occur where existing roads, water, and sewer are in place and in a manner that minimizes the impact of development on existing infrastructure and services.

Minor specific land use designation and related zoning map changes are currently proposed for the 2040 General Plan outside of the Specific Plan and Millbrae Station Area Master Plan area³ within the City of Millbrae. These minor map amendments are to ensure consistency with existing land uses, such as public utilities, recreational facilities, and parks. These amendments will not substantially change the development potential for these properties. Rather, the 2040 General Plan serves as the City's long-term development blueprint through 2040, contains goals and policies guiding land use and infrastructure decisions through 2040, and brings the General Plan up to date in response to latest State and regional plans and regulations related to housing,⁴ environmental justice,⁵ and climate-related hazards,⁶ water supply, and mobility. As such, the updated policies of the proposed 2040 General Plan are the focus of the 2040 General Plan description below, and the development opportunities and updated zoning under the umbrella of the 2040 General Plan are discussed in detail further below under the proposed Specific Plan description.

Proposed General Plan Elements Aspects

Land Use and Built Environment Element

The Land Use Element contains the Land Use Map as well as the policies and standards that directly shape land use decisions and the resulting physical development of Millbrae. The Land Use Element serves as the primary means for ensuring that new land uses are logically organized and developed sustainably. With limited opportunities for new development, the Land Use Element promotes and emphasizes infill development and redevelopment of underutilized parcels. The Land Use Element also promotes transit-oriented development and walkable communities, encouraging mixed-use development where residents can live close to businesses and employment opportunities. The Land Use Element to marginalized and at-risk communities.

PROPOSED LAND USE DESIGNATIONS

The Land Use Element establishes eleven separate land use designations to provide a mixture of land uses for the City. The specific land use designations in the Land Use Element are shown in Table 2-3. Figure 2-5 shows the proposed Land Use Map, and Figure 2-6 shows the mixed-use designations.

³ The Millbrae Station Area Master Plan area was assessed in the Millbrae Station Area Master Plan IS-MND.

⁴ The City will update the Millbrae Housing Element as part of the 6th Cycle Regional Housing Needs Allocation (RHNA) and to comply with California Government Code Sections 65580 to 65589.11.

⁵ Pursuant to Senate Bill (SB) 1000, which amended California Government Code Section 65302.

⁶ Pursuant to SB 379, which amended California Government Code Section 65302.

Land Use Designation	Description	Residential Density	Intensity (Floor Area Ratio)
Residential			
Very Low Residential	This designation provides for detached single- family residential development at a density of up to four units per acre, not including any permitted Accessory Dwelling Units (ADUs) or Junior ADUs. Other uses may include schools, childcare centers, country clubs, and places of worship.	4 units/acre	0.5 (max)
Low Density Residential	This designation provides for detached single- family residential development at a density of 4.1 to 8 units per acre, not including any permitted ADU's or Junior ADUs. Other uses may include schools, childcare centers, and places of worship.	4.1-8 units/acre	0.5 (max)
Medium Residential	This designation provides for single family, duplex, and triplex residential development at a density of 8.1 to 17 units per acre. Other uses may include schools, childcare centers, places of worship, and apartment buildings consistent with the density and neighborhood character.	8.1-17 units/acre	0.5 (max)
Medium-High Residential	This designation provides for multifamily residential development at a density of 17.1 to 43 units per acre. Other uses may include rooming and boarding houses, clubs and lodges, community centers, sanitariums, rest homes, schools, childcare centers, and places of worship.	17.1-43 units/acre	0.5 (max)
High Density Residential	This designation provides for multifamily residential development at a density of 43.1 to 80 units per acre. Other uses may include rooming and boarding houses, clubs and lodges, community centers, residential care facilities, schools, childcare centers, places of worship, and hotels.	43.1-80 units/acre	0.5 (max)
Mixed Use			
Downtown and El Camino Real Specific Plan	The Downtown and El Camino Real Specific Plan designation applies to all parcels in the Downtown and El Camino Real Specific Plan (D&ECRSP) boundary outside of the Station Area and is intended to provide housing and community- and visitor-serving uses. Details on the precise mix of uses and building intensity and other standards are contained in the Downtown and El Camino Real Specific Plan. The Downtown and El Camino Real Specific Plan designation provides for a wide variety of uses including residential, retail, hotels, offices, public facilities, and mixed use.	25 – 130 units/acre	2.5 – 3.5 units/acre
Millbrae Station Area Specific Plan	The Millbrae Station Area Specific Plan designation applies to all parcels in the Millbrae Station Area Specific Plan (MSASP) and is intended to guide the creation of a new economic center in and around the Millbrae Station that includes vibrant, diverse, and transit-oriented developments. Details on the precise mix of uses	30 - 80 units/acre	0.3 – 2.5

Table 2-3 Description of Proposed Millbrae Land Use Designations

Land Use Designation	Description	Residential Density	Intensity (Floor Area Ratio)
	and building intensity and other standards are contained in the MSASP. The Millbrae Station Area Specific Plan designation provides for a wide variety of uses including residential, retail, hotels, employment center/light industrial, public facilities, and mixed uses.		
Commercial			
Commercial	This designation provides for a full range of retail commercial uses including apparel and accessory stores, food stores, banks, personal and professional services, hospitals, offices, large format retail stores, and eating and drinking establishments. Other uses may include multi- family residential, hotels and outdoor sales.	n/a	0.25 to 3.0
Industrial			
Industrial	This designation provides for a wide range of industrial, manufacturing, research and development, warehousing, and automotive uses.	n/a	1.5 (max)
Resource and Public Inst	itutional		
Parks, Recreation and Open Space	This designation provides for public and private parks, public and private recreational uses including golf courses, open spaces, and areas that can be programmed for recreational uses.	n/a	n/a
Public/Institutional/ Utility Facilities	This designation provides for uses that are public, quasi-public, or privately-owned but community serving in nature, including government or public agency offices/operations/corporation yards, public and private, schools, childcare centers, and community centers. Other uses may include facilities owned and/or operated by public utilities to serve the public with electricity, gas, water, and communications, as well as service commercial uses.	n/a	n/a

Source: Millbrae, City of. 2022. Millbrae Draft 2040 General Plan Land Use and Built Environment Element.

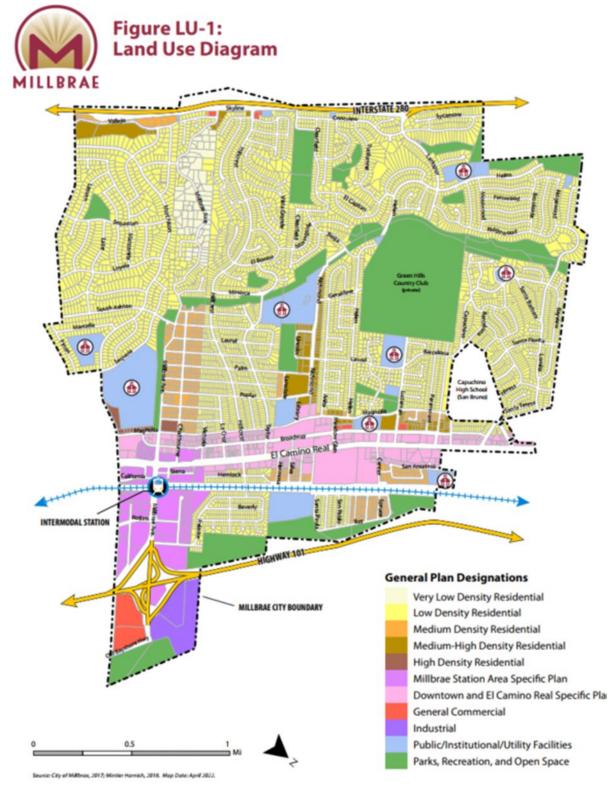


Figure 2-5 Proposed Millbrae Land Use Designations Map

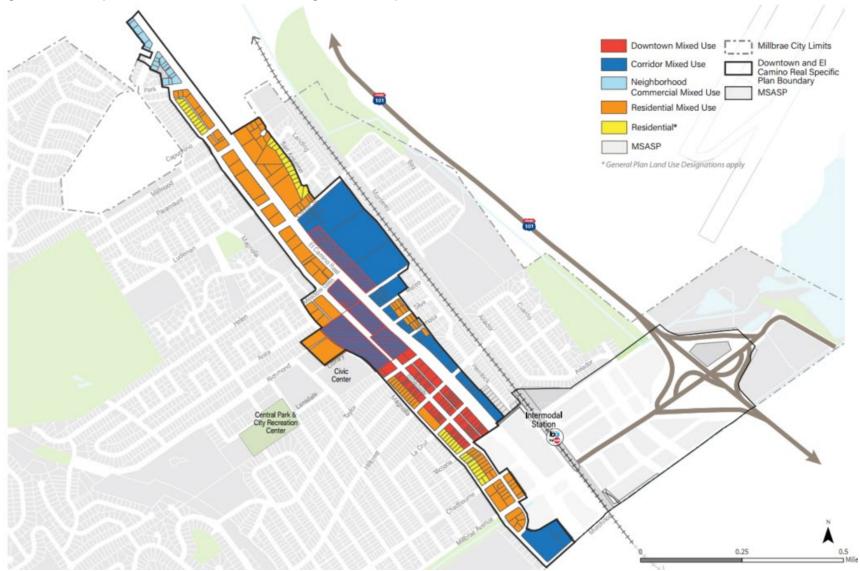


Figure 2-6 Proposed Millbrae Mixed-use Designations Map

PROPOSED LAND USE AND BUILT ENVIRONMENT ELEMENT GOALS, POLICIES, AND PROGRAMS

Goals and supportive policies and programs of the proposed General Plan Land Use and Built Environment Element are shown in Table 2-4.

Table 2-4	Millbrae Land Use and Built Environment Element Goals, Policies, and
Programs	

ID #	Goals and Supportive Policies/Programs
Goal LU-1	Integrate new development with the fabric of the surrounding neighborhoods to create a cohesive community.
Policy LU-1.1	Prioritize New Development in Specific Plan Areas. The City shall prioritize higher density and intensity development around the Millbrae Station, along El Camino Real, and in Downtown. The City shall use specific plans for these areas to ensure new development is context sensitive, contributes to a positive city image, and preserves the positive qualities of surrounding neighborhoods.
Policy LU-1.2	Land Uses that Maximize Transit. The City shall encourage higher-intensity development around the Millbrae Station and along the El Camino Real corridor that maximizes transit use.
Policy LU-1.3	Clear and Predictable Development Standards. The City shall adopt objective development standards to facilitate an efficient development review process, promote cost-effective development, decrease City staff review time, and ensure new development meets the expectations of the City.
Policy LU-1.4	Public-Private Partnerships. The City shall consider opportunities to use public investment to form partnerships with the private sector to achieve quality infill development, enhance the public realm, and encourage public transit, walking, and biking.
Policy LU-1.5	Revitalization and Redevelopment. The City shall encourage property owners citywide to contribute to the community by revitalizing and redeveloping abandoned, obsolete, or underutilized properties.
Policy LU-1.6	Child Care Facilities. The city shall encourage efforts to expand the overall capacity of local childcare and early childhood development centers in San Mateo. Identify opportunities for affordable alternatives to pre-school and pre-kindergarten through partnerships with the Millbrae School District, the Recreation Department, private providers, and community organizations. Integrate childcare facility needs into the City's planning processes. Where possible, locate childcare services in or near housing and transportation and employment centers for convenient access.
Goal LU-2	Support a variety of housing opportunities and improve access to housing for all community members.
Policy LU-2.1	Balanced Neighborhoods. The City shall strive to provide balanced, diverse neighborhoods with a variety of housing types and density ranges to meet the varied needs of residents by promoting the provision of lower- and moderate-income housing and higher-density residential uses near the Millbrae Station, along El Camino Real, and in Downtown.
Policy LU-2.2	Maximize Mixed-Use Residential Density. The City shall encourage mixed-use projects and maximize the allowable density of the residential portion.
Policy LU-2.3	Housing Near Jobs. The City shall support opportunities that enable people to live close to job locations.
Policy LU-2.4	Private Open Space in Multifamily Residential. In addition to the required dedication of parkland or payment of the City's Development Impact Fee for Park Acquisition and Facilities, the City shall also require all multifamily residential projects, including those that are part of a mixed-use project, to provide a minimum amount of private and common open space for use by residents of the project, such as private balconies or patios, and common ground-level courtyards and upper floor or rooftop patios, as specified in the zoning code or Specific Plans.

ID #	Goals and Supportive Policies/Programs
Goal LU-3	Preserve and enhance the identity and qualities of Millbrae's distinct residential neighborhoods to ensure Millbrae remains a desirable place to live.
Policy LU-3.1	Neighborhood Character. The City shall strive to ensure that all new construction, additions, or remodeling projects are compatible with the architecture of the building, surrounding neighborhood and of the community as a whole.
Policy LU-3.2	Residential Design Standards. The City shall prepare and implement Residential Design Standards to ensure consistency with current local, regional, and State laws, as well as industry standards.
Policy LU-3.3	Residential Design Review. To support and enhance the existing character of Millbrae's distinct neighborhoods, the City shall require design review of new single-family residences and large second story additions to ensure compatibility of new projects with objective residential design standards, including architectural style, scale, mass, bulk, color, materials, FAR, lot coverage, hillside grading, landscaping, and setbacks.
Policy LU-3.4	Minimize Privacy and View Impacts. The City shall require residential additions, and new residences to be designed in a manner that respects the privacy of nearby homes, provides access to sunlight, and minimizes obstruction of primary panoramic or scenic views of the San Francisco Bay from principal rooms of a residence, consistent with objective residential design standards.
Policy LU-3.5	Community Engagement in Planning Decisions. The City shall facilitate community engagement in planning decisions by enhancing outreach efforts and encouraging community meetings to review and comment on plans, programs, activities, and reports covering new development projects. In addition, the City shall ensure that all development applications are appropriately noticed in conformance with State and City public notice requirements.
Policy LU-3.6	Neighbor-to-Neighbor Dispute Mediation. For issues that do not involve violation of City laws, the City shall continue to encourage residents to utilize a professional mediation service to resolve neighbor-to-neighbor disputes in a fair and equitable way.
Policy LU-3.7	Walkable Neighborhoods. The City shall promote the pedestrian-scaled environment and walkable neighborhoods by supporting and providing alternative modes of transportation, enhancing bike and pedestrian connectivity to local commercial districts and the Millbrae Station, and maintaining or requiring owner maintenance of public sidewalks, public plazas, parks, greenways, parkways, street tree canopies, and landscaping throughout residential neighborhoods.
Policy LU-3.8	Neighborhood Volunteers. The City shall continue to encourage the maintenance and improvement of residential neighborhoods through volunteer programs and events such as neighborhood watch groups, tree planting, Adopt-a-Spot, community clean-ups, neighborhood disaster preparedness, and others.
Goal LU-4	Enhance the area within the Downtown and El Camino Real Specific Plan boundary into a vibrant and accessible destination for residents, employees, and visitors.
Policy LU-4.1	Downtown and El Camino Real Specific Plan Compliance. The City shall ensure that new development within the Specific Plan boundary complies with the land use regulations and development standards in the Downtown and El Camino Real Specific Plan.
Policy LU-4.2	Maintain the Downtown and El Camino Real Specific Plan. The City shall regularly review and update land use regulations and development standards in the Downtown and El Camino Real Specific Plan to ensure sufficient flexibility to respond to changing market conditions, and to promote the creation of a mixed-use district.
Policy LU-4.3	Mix of Commercial Uses. The City shall promote a mix of commercial uses that support a day and evening environment within the Downtown and El Camino Real Specific Plan boundary, including retail, services, restaurants, entertainment venues, hotels, fitness centers, and offices.
Policy LU-4.4	Pedestrian Safety and Connectivity. The City shall improve pedestrian safety and connectivity between the Millbrae Station and Downtown, ensuring appropriate crossings along El Camino Real
Policy LU-4.5	Community Gathering Places. The City shall encourage the development of community gathering places within the Downtown and El Camino Real Specific Plan boundary, such as plazas, parklets, and pocket parks.

ID #	Goals and Supportive Policies/Programs
Policy LU-4.6	Hotel Development. The City shall support the development of hotels within the Downtown and El Camino Real Specific Plan boundary, including boutique hotels and internationally-recognized hote chains.
Policy LU-4.7	Regulate Fast Food Restaurants and Drive-Throughs. The City shall regulate fast food restaurants and chain convenience stores within the Downtown and El Camino Real Specific Plan boundary and require use permits for drive-throughs.
Goal LU-5	Enhance Downtown as a vibrant, pedestrian-scaled district with a mix of land uses that elevates the prominence of the area and fosters investments in Millbrae.
Policy LU-5.1	Vertical Mixed Use. The City shall encourage vertical mixed-use in Downtown with active ground floor uses and residential and office uses on the upper floors.
Policy LU-5.2	Community Anchor. To create a community gathering place and to attract more pedestrian traffic in Downtown, the City shall encourage the development of a community anchor on the northern end of Downtown, consistent with the goals, policies, and development standards in the Downtown and El Camino Real Specific Plan.
Policy LU-5.3	Parking Requirements. The City shall review and update the parking requirements for properties in the Downtown area contained within the Downtown and El Camino Real Specific Plan as needed, including provisions for parking for mixed-use projects, off-site parking, payment of in-lieu parking fees, and other shared parking options.
Goal LU-6	Revitalize El Camino Real into a "grand boulevard" by encouraging transit-oriented, mixed-use development with an inviting pedestrian environment.
Policy LU-6.1	Transition in Scale. As specified in the Specific Plan, the City shall ensure new development incorporates a transition in scale between high-density development along El Camino Real and adjacent neighborhoods through use of setbacks and step-backs as new development gets closer to property lines.
Policy LU-6.2	General Commercial and Office Development. The City shall encourage renovation and upgrading of existing general commercial and office space, and the development of new hotel, general commercial, and office space along El Camino Real to allow for development that supports jobs and the tax base.
Policy LU-6.3	Public Realm. The City shall improve and enhance the public realm along El Camino Real through landscaping, streetscape improvements, safety improvements, architectural elements, and similar improvements to create a welcoming gateway into the city.
Policy LU-6.4	Parking Requirements. The City shall review and update the parking requirements for properties in the El Camino Real area contained within the Downtown and El Camino Real Specific Plan as needed, including provisions for parking for mixed-use, commercial, and residential projects, offsite parking, payment of in-lieu parking fees, and other shared parking options.
Policy LU-6.5	Street Trees. The City shall preserve existing street trees, replace dying or diseased trees, and plan new trees along El Camino Real consistent with the Downtown and El Camino Real Specific Plan, including the Streetscape Plan.
Goal LU-7	Transform the Station Area into a walkable, mixed-use district that supports connectivity between the Millbrae Station and Downtown.
Policy LU-7.1	Ensure Compliance with the Millbrae Station Area Specific Plan. The City shall ensure that new development within the Station Area complies with the land use regulations and development standards in the Millbrae Station Area Specific Plan.
Policy LU-7.2	Regularly Review the Millbrae Station Area Specific Plan. The City shall regularly review and update land use regulations and development standards in the MSASP to ensure sufficient flexibility to respond to changing market conditions, and to promote the creation of a mixed-use district.
Policy LU-7.3	Vibrant Activity Center. The City shall encourage the types of uses and the treatment of development within the Station Area to promote a vibrant activity center and gateway to the city.

ID #	Goals and Supportive Policies/Programs
Policy LU-7.4	High Density, Mixed-Use Development. The City shall encourage high density, mixed-use development in the Station Area with restaurants, retail, entertainment, offices, and residential to promote the creation of a compact, walkable, transit-oriented district.
Policy LU-7.5	Light Industrial Land Use Needs. The City shall designate land for office and light industrial uses in the Station Area to allow for development that supports jobs and the tax base, particularly in life sciences, research and development, STEM, technology/biotechnology manufacturing, and high-tech services.
Policy LU-7.6	Class A Office Space. The City shall encourage Class A office development in the Station Area to take advantage of proximity to the Millbrae Station, U.S. Highway 101, and new residential development. The City shall encourage developers to employ state-of-the-art design techniques to maximize space, flexibility, and functionality.
Policy LU-7.7	Cohesive Urban Fabric. The City shall ensure that new development within the Station Area complements and enhances City image and provides adequate connections to El Camino Real and Downtown to support a cohesive urban fabric. (
Goal LU-8	Ensure the adequate provision of civic facilities to serve current and future residents.
Policy LU-8.1	City Facilities Master Plan. The City shall prepare a City Facilities Master Plan to maintain and plan for the provision of adequate facilities for police, fire, recreation, public works, administrative, community meeting space needs of the City. The City shall consider expansion of City staff offices to the second floor of City Hall, the creation of a corporation yard, a Public Works/Engineering facility that is separate from City Hall, and additional electric vehicle charging stations.
Policy LU-8.2	Community-Serving Facilities. The City shall ensure adequate provision of community-serving facilities to serve current and future residents, including the Millbrae Library, schools, and other educational institutions, as well as child and senior day care facilities.
Policy LU-8.3	Millbrae Library. The City shall continue to participate in the Joint Powers Agreement with the County to provide library services at the Millbrae Library.
Goal LU-9	Ensure high-quality site planning, landscaping, and architectural design for all new construction, renovation, or remodeling.
Policy LU-9.1	Design Character. The City shall encourage new development projects and substantial additions and remodels to include design elements that contribute to the area's character and sense of place.
Policy LU-9.2	Transition in Scale and Form. The City shall ensure higher-density development adjacent to existing residential neighborhoods provide transitions in scale and form through objective design standards.
Policy LU-9.3	Community Preservation Ordinance. The City shall continue to administer and enforce the Community Preservation Ordinance to maintain quality of life.
Policy LU-9.4	Trees and Landscaping. The City shall protect the existing tree canopy and encourage tree planting including drought-tolerant landscaping and green infrastructure.
Goal LU-10	Ensure the adequate provision of safe and reliable public infrastructure and facilities to meet the City's current and future needs.
Policy LU-10.1	Maintaining Public Infrastructure. The City shall maintain public infrastructure to ensure the provision of safe and reliable infrastructure to meet the City's current and future needs, including facilitating upgrades to the utility infrastructure necessary for improved and emerging technologies.
Policy LU-10.2	Adequate Municipal Services and Facilities. The City shall continue to ensure that new and existing developments can be adequately served by municipal services and facilities in accordance with City standards.

ID #	Goals and Supportive Policies/Programs
Policy LU-10.3	Development Impact Fees. The City shall regularly evaluate and update development impact fees, including area fees for specific plan areas, to ensure that new development pays its fair share of costs to offset the costs of public capital facilities and infrastructure that is needed to serve new demand created by development projects. This includes, but is not limited to, fees for public safety, libraries, general government facilities, transportation (including both roadway and alternative mode facility improvements), parks and recreation land and facilities, water, sanitary sewer, stormwater drainage, and other required capital facilities and infrastructure.
Policy LU-10.4	Capital Improvement Program. The City shall continue to fund maintenance, improvements, and expansion of city infrastructure, including sewer and sanitary sewer utility lines and water infrastructure through a multi-year Capital Improvement Program.
Policy LU-10.5	Undergrounding Utilities. The City shall require new developments to underground utilities, whenever it is feasible to do so.
Policy LU-10.6	Water, Storm Drainage, and Sanitary Sewer System. The City shall continue efforts to replace and retrofit the City water storage tanks, water distribution system, storm drainage system, and the sanitary sewer collection system.
Goal LU-11	Ensure that all land use decisions benefit Millbrae residents equally and do no not create a disproportionate burden to any resident based on location, income, race/ethnicity, educational status, or national origin.
Policy LU-11.1	Environmental Justice Consideration. The City shall consider potential adverse health and safety impacts associated with land use decisions and reduce negative impacts on residents from hazardous materials, industrial activities, facility locations, and design features.
Policy LU-11.2	Environmental Protection. The City shall apply environmental protection measures equally among all neighborhoods and areas within the community.
Policy LU-11.3	Equitable Public Services. The City shall equitably provide public services and infrastructure, including parks, recreational facilities, community gardens, and public safety facilities, to all Millbrae residents.
Policy LU-11.4	New Incompatible Uses. The City shall limit the introduction of new incompatible land uses and environmental hazards into existing residential areas.
Policy LU-11.5	Safe and Sanitary Housing. The City shall provide standards for development that promote safe and sanitary housing through implementation of the Housing Element.
Goal LU-12	Ensure all residents have equal access to healthy foods, education, green spaces, and medical services.
Policy LU-12.1	Access to Community Resources. The City shall identify and address gaps in access to residential, commercial, recreation facilities, natural open spaces areas, and physical and mental health resources, to help ensure that these resources are equally available to all residents.
Policy LU-12.2	Equity in Capital Projects. The City shall promote equitable investment in capital improvements citywide.
Policy LU-12.3	Healthy Food Providers. The City shall encourage farmers' markets and affordable healthier food options, particularly near child-oriented uses. (e.g., schools, day care, parks).
Policy LU-12.4	Acceptance of Government-Issues Vouchers. The City shall coordinate with the Millbrae Farmer's Market vendors and local food retailers to accept payment through Electronic Benefit Transfer (EBT), which allows residents in the Supplemental Nutrition Assistance Program (SNAP) and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) to purchase food with their program benefits.
Goal LU-13	Fully engage the public in City decision-making and facilitate public involvement in civic life.
Policy LU-13.1	Accessibility to City Events. The City shall strive to schedule City events using different days, times, and formats (i.e., virtual and digital accessibility, interpretation services, and closed captioning) to encourage and facilitate participation among community members with work, school, and other obligations that conflict with more traditional scheduling.

ID #	Goals and Supportive Policies/Programs
Policy LU-13.2	Innovative Communication. The City shall promote and implement new and innovative approaches to facilitate communication between members of the community and City elected officials and staff members
Policy LU-13.3	Facilitate a Culture of Inclusion. The City shall work with non-profit, faith, education, and other community-based partners to facilitate a culture of inclusion, empathy, compassion, acceptance, and unity.
Policy LU-13.4	Transparent Public Decision-Making. The City shall ensure transparent public decision-making processes through effective public outreach, engagement, and participation that is inclusive of socially disadvantaged individuals and groups.
Policy LU-13.5	Community Budgeting. The City shall engage the community through multiple participation opportunities in the City's budget process.
Policy LU-13.6	Supportive Collaboration. The City shall continue to collaborate with other organizations and groups to provide services and programs for all Millbrae residents.
Implementation	Programs
Program A	Comprehensive Zoning Ordinance Update. The City shall review and update the Millbrae Zoning Ordinance to ensure consistency with the 2040 General Plan and the Downtown and El Camino Real Specific Plan, to include objective design standards and review processes.
Program B	Objective Residential Design Standards. The City shall prepare and implement Objective Residential Design Standards.
Program C	Design Review Process for Residential, Commercial, and Mixed-Use Projects. The City shall review and update the design review process for residential, commercial, and mixed-use projects. The City shall revise the process to assist City staff and decision makers in their decision-making process and applicability of objective design standards. This review and update shall consider the adoption of a Director's Administrative Decision process that provides for discretionary staff review as an alternative to requiring Planning Commission review.
Program D	City Facilities Master Plan. The City shall prepare a City Facilities Master Plan that describes the City's vision for the future creation of a civic center district, and a timeline of the actions the City needs to take to achieve this vision. The plan shall include planning for the provision of adequate public facilities, and maintenance of these facilities.
Program E	Street Tree and Landscape Master Plan. The City shall complete and adopt a Street Tree and Landscape Master Plan. The plan shall include an inventory of existing street trees, establish locations and a timeline for new tree plantings, and implement the Broadway and El Camino Real Streetscape Plan. The plan should include special plantings at gateways to the city. Themes throughout the plan shall include promoting the use of indigenous species and the concept of interconnected open space linked by dense street plantings along the sides of streets and in median strips.
Program F	Tree Preservation Ordinance. The City shall update the Tree Protection and Urban Forestry Program Ordinance to update the types and sizes of trees on private property to be protected, and to establish the standards to make decisions about tree removal permits, the procedures for tree removal or major trimming, and the requirements for replacement trees.
Program G	Development Impact Fee Review. The City shall review and update the development impact fees consistent with state law to ensure that new projects pay their fair share of the costs necessary to improve or expand capital facility infrastructure and to serve them. A new Area Development Impact Fee will be adopted for the Downtown and El Camino Real Specific Plan.
Program H	Capital Improvement Program (CIP). The City shall review and update the Capital Improvement Program (CIP) as part of the budget process to ensure adequate and timely provision of capital facilities and infrastructure and economic development activities.
Program I	Recycled Water Plan. The City shall prepare and implement a Recycled Water Plan that provides principles, policies, educational components, and actions that promote the use of recycled water. The City shall pursue grant opportunities as a funding mechanism for the Plan.

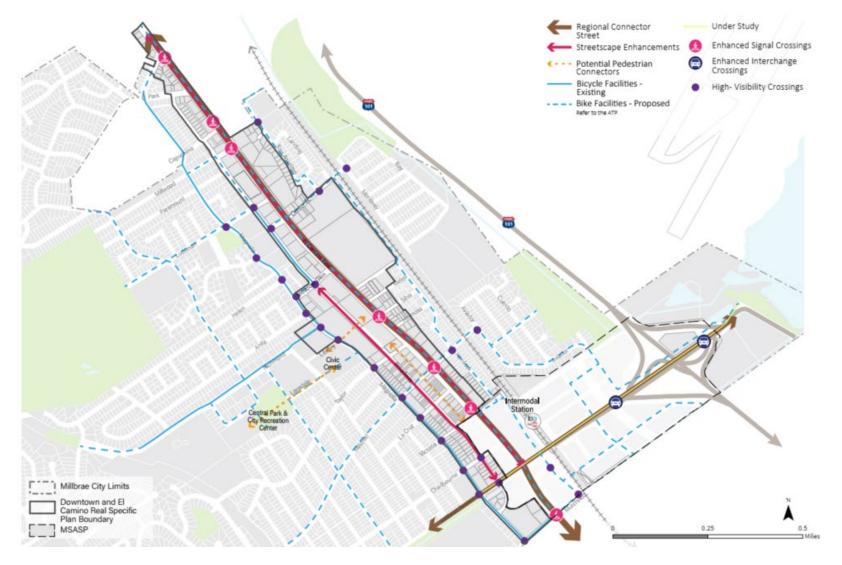
ID #	Goals and Supportive Policies/Programs
Program J	Storm Drain Master Plan. The City shall update the Storm Drain Master Plan (August 2018) to ensure sufficient capacity for stormwater runoff from development and to reduce the potential for flooding in low-lying areas.
Program K	Capital Improvement Prioritization. The City shall establish a defined set of criteria that measure and prioritize equitable distribution of Capital Improvement Projects (CIP) citywide and use the criteria in all future CIP Program decisions.
Program L	Rental Multi-Family Housing Inspection Program . The City shall evaluate creation of a new program to ensure that all multi-family rental housing is inspected on a three to five-year cycle to ensure compliance with all building, housing, and other codes for safe and sanitary housing.
Program M	Community-Based Budget Process. The City shall develop and facilitate a community engagement opportunity in the development of the City budget to provide the public an opportunity to identify funding priorities annually.
Program N	Environmental Justice Outreach. The City shall prepare and use clear and inclusive outreach materials, expand media campaigns, and implement other strategies (i.e., translation services) to increase and advance environmental justice initiatives.
Program O	Community Engagement. The City shall prepare and implement a program that includes new and innovative mechanisms to communicate and engage members of the community who are not typically active in civic issues to foster stronger relationships with the City and the San Mateo County Sheriff's Office Millbrae Police Bureau.
Source: Millbrae,	City of. 2022. Millbrae Draft 2040 General Plan Land Use and Built Environment Element.

Mobility and Circulation Element

The Mobility and Circulation Element addresses the movement of people and goods in and around Millbrae. It works in tandem with the Land Use and Built Environment Element to create a more livable city, where residents and workers can travel safely, easily, and affordably using a variety of transportation modes. The Mobility and Circulation Element seeks to create an efficient, safe, balanced, and integrated multi-modal transportation system that is accessible to all users, supports regional collaboration to advance a well-connected regional transportation system, and supports a local perspective to address neighborhood connectivity. The Mobility and Circulation Element considers complete streets that also incorporate walking and biking. With transition to higher-density, transit-oriented development around the Millbrae Station and along major roadway corridors where public transit service is well developed, the Mobility and Circulation Element emphasizes linking the transit-rich areas to adjacent neighborhoods, shopping districts, and employment centers with a multi-modal transportation planning approach. Figure 2-7 depicts the proposed citywide circulation map.

Figure 2-7 Proposed Millbrae Circulation Map





PROPOSED MOBILITY AND CIRCULATION ELEMENT GOALS, POLICIES, AND PROGRAMS

Goals and supportive policies and programs of the proposed General Plan Mobility and Circulation Element are shown in Table 2-5.

ID #	Goals and Supportive Policies/Programs
Goal M-1	Design, build, maintain, and operate streets to be safe and accessible for all users, regardless of their age, ability, or whether they are walking, bicycling, taking transit, or driving.
Policy M-1.1	Serving All Users. The City shall develop, or require new development to incorporate into proposed projects, complete streets infrastructure, where applicable, sufficient to provide safe, comfortable, and convenient travel along and across streets to serve all types of travel (including pedestrians, bicyclists, motorists, movers of commercial goods, micromobility, and public transportation), and users (including persons with disabilities, seniors, children, and families).
Policy M-1.2	Multimodal Choices. The City shall promote development of an integrated, multimodal transportation system that offers desirable choices among travel modes including micromobility, pedestrian ways, bikeways, public transportation, and roadways.
Policy M-1.3	Context Sensitivity. The City shall consider the land use and urban design context of adjacent properties in both residential and business districts, as well as urban and suburban areas when designing complete streets.
Policy M-1.4	Accessibility and Connectivity. The City shall create a more comprehensive multimodal transportation system by identifying and eliminating gaps in roadways, bikeways, and pedestrian networks; increasing transit access in underserved areas; and removing natural and man-made barriers to accessibility and connectivity.
Policy M-1.5	Traffic Diversion. The City shall strive to protect the character of Millbrae's residential neighborhoods by discouraging non-local and commercial traffic from local streets through land use restrictions and traffic control devices, where appropriate.
Policy M-1.6	Traffic Calming. The City shall continue to implement traffic calming measures in residential neighborhoods, as appropriate.
Policy M-1.7	Neighborhood Access. The City shall require new development projects in residential neighborhoods provide appropriate ingress and egress to ensure safety and discourage through traffic on residential streets.
Policy M-1.8	Roadway Maintenance and Repair. The City shall seek innovative solutions, such as assessment districts and expanded impact fees, to fund and implement a robust repair and maintenance program for transportation infrastructure.
Policy M-1.9	Wayfinding. The City shall maintain and enhance wayfinding signage designed to serve all travel modes, particularly at major intersections and in the Downtown to enhance connectivity to the transit corridors and Millbrae Station.
Policy M-1.10	Streetscape Improvements. The City shall provide an attractive streetscape along El Camino Real and Broadway to encourage walking by adding and maintaining pedestrian-scale lighting, benches, public art, wayfinding signage, and street furniture consistent with the Downtown and El Camino Specific Plan.
Policy M-1.11	ADA Compliance. The City shall ensure that the circulation system is safe and accessible, consistent with the American with Disabilities Act (ADA), to allow mobility-impaired users, such as disabled persons and seniors, to safely travel within city.

 Table 2-5
 Millbrae Mobility and Circulation Element Goals, Policies, and Programs

ID #	Goals and Supportive Policies/Programs
Policy M-1.12	Measuring Vehicle Level of Service (LOS). The City shall measure vehicle LOS based on the methodology contained in the latest version of the Highway Capacity Manual (HCM) published by the Transportation Research Board. The City shall strive to achieve acceptable vehicle levels of service, by roadway classification, as follows:
	 Metropolitan Transportation System: LOS standards for roads that are designated as part of the Metropolitan Transportation System (MTS) by the San Mateo County Congestion Management Program (CMP) shall be consistent with the LOS standards in the most current CMP. In Millbrae, MTS roads are the U.S. 101 freeway, the I-280 freeway, and El Camino Real (State Route 82). Streets and intersections within the Priority Development Area (PDA): LOS "E"
	 Other streets and intersections adjacent to non-residential land uses: LOS "D" Other streets and intersections adjacent to only residential land uses: LOS "C"
	If maintaining the above LOS standards would, in the City's judgment, be infeasible and/or conflict with the achievement of other goals, LOS "E" or "F" conditions may be accepted provided that the project pays applicable Development Impact Fees for coordinated citywide transportation and mobility improvements, and the project incorporates TDM measures to promote non-vehicular transportation, and/or implement vehicle trip reduction measures.
Policy M-1.13	Maintaining Traffic Level of Service. The City shall strive to achieve or exceed adopted traffic LOS standards during peak traffic hours through Transportation Systems Management (TSM), Transportation Demand Management (TDM), street maintenance, Capital Improvement Programming, coordination with federal, state, county, private and district funding programs for street and other transportation improvements. The City shall require developer payment of pro rata fair share of traffic improvement costs for new developments
Policy M-1.14	Establish VMT Threshold. The City, in coordination with the City/County Association of Governments of San Mateo County (C/CAG) as the designated Congestion Management Agency for the County, shall implement and require compliance with vehicle miles traveled (VMT) thresholds based on VMT per population and/or employment for the purpose of environmental review under the California Environmental Quality Act (CEQA), but continue to implement Policy M-1.12: Measuring Vehicle Level of Service (LOS) for the purpose of planning and designing street improvements.
Policy M-1.15	Transportation Studies for New Development. The City shall require new development projects to perform site-specific transportation studies based on City implementation standards (including access, circulation, parking, and safety for all transportation modes) to identify and implement transportation-related improvements (and/or a fair share contribution via the payment of the applicable required Development Impact Fees for transportation and mobility) to maintain acceptable level of service standards, VMT thresholds, safe access for all modes, and acceptable traffic operations at project access points consistent with Policy M-1.12.
Policy M-1.16	Fair Share Funding. During the development review process, the City shall, through a combination of construction, development impact fees, and other funding mechanisms, ensure that new development projects contribute their fair share, based on transportation studies, of providing off- site transportation improvements that will improve multimodal circulation within the City. Such sharing will also cover the incremental improvement costs of the street, bicycle, and pedestrian systems that serve City residents, employees and visitors.
Policy M-1.17	Impact Mitigation for Projects Outside Millbrae. During the environmental review process for new development projects in adjoining jurisdictions, the City shall prepare and submit comments to the jurisdiction requesting that any potential significant transportation impacts or inconsistency with General Plan policies expected to occur in Millbrae as a result of the project, be mitigated to a less-than-significant level.
Policy M-1.18	Specific Plan Improvements and Strategies. The City shall continue to implement the improvements and strategies identified in the Millbrae Station Area and the Downtown and El Camino Real Specific Plans and all future adopted specific plans to ensure consistency with General Plan policies and make improvements to the transportation system, including improvements to bicycle and pedestrian facilities in the city of Millbrae.

ID #	Goals and Supportive Policies/Programs
Policy M-1.19	Off-Peak Commercial Deliveries. The City shall review, and as appropriate, impose limits on the timing of commercial deliveries that could have negative impacts on the surrounding land uses, through the Conditional Use Permit process.
Policy M-1.20	Truck Routes. The City shall maintain a commercial truck routes map as needed to ensure the needs of businesses are met while minimizing potential adverse impacts to the rest of the community.
Policy M-1.21	Student Transportation Services. The City shall work with school districts to create school bus or TDM programs such as walking school buses to serve the local needs of the students and reduce single-occupant vehicle trips.
Policy M-1.22	Shuttle Service. The City shall strive to increase use of available shuttles in Millbrae to support businesses, residents, and schools by pursing grants and partnerships for funding, improving signage, outreach, and coordination with co-sponsors.
Policy M-1.23	Grade Separations. The City shall study grade separations to improve access and safety.
Goal M-2	Provide an efficient, convenient, and accessible public transit system for residents, workers, and visitors in Millbrae.
Policy M-2.1	Caltrain and BART. The City shall coordinate with Caltrain and BART to assure the Millbrae Station is well-maintained, has adequate parking, a safe environment, and continues to provide high-quality service.
Policy M-2.2	California High Speed Rail . The City shall continue to work with and strongly advocate that the California High-Speed Rail Authority plan a high-quality, well-designed Millbrae-SFO Station that enhances access and services and fully integrates all transit modes serving the Station into a single station and is also coordinated and interconnected with the surrounding environment including development projects. The City will continue to request that a variety of alternatives are considered, including alternatives that provide the least impact on the community.
Policy M-2.3	Bus and Shuttle Service. The City shall work with SamTrans, other agencies, private companies, and organizations to provide and manage appropriate community-serving transit service and coordination of schedules and services with other transit agencies. Shuttle service should focus on connecting transit, hotels, and employment centers with the City's Downtown.
Goal M-3	Provide a robust and interconnected bicycle and pedestrian circulation system throughout the city that promotes healthy lifestyles and is a viable alternative to automobile use.
Policy M-3.1	Active Transportation Plan. The City shall maintain and implement the Active Transportation Plan to enhance the city's bicycle and pedestrian network.
Policy M-3.2	Trail Access. The City shall enhance the system of pathways providing access to the Spur Trail, the Bay Trail, the Bay Area Ridge Trail, the Crystal Springs Regional Trail, and closing gaps in the trail system.
Policy M-3.3	Bay Trail. The City shall support the completion of the Bay Trail in coordination with regional agencies, and the selection of the trail route and implementation of the trail system in an appropriate alignment between Millbrae and South San Francisco.
Policy M-3.4	Bikeways System. The City shall develop and maintain a safe and logical bikeways system that is coordinated with the countywide system (consistent with the San Mateo County Bicycle and Pedestrian Plan) and the neighboring cities of San Bruno and Burlingame.
Policy M-3.5	Bicycle Lanes on El Camino Real. The City shall explore options for providing separated or buffered bicycle lanes along El Camino Real and developing parallel alternative routes to the El Camino Real route to provide for connectivity for bicyclists of all ages and abilities, consistent with the Active Transportation Plan and Downtown and El Camino Real Specific Plan.
Policy M-3.6	Bicycle Safety. The City shall require bicycle facilities to be upgraded to increase the visibility and protection of bicyclists relative to other roadway users. This includes clearer separation between vehicles and bicyclists, clear delineated markings along principal arterials and at intersections (such as green pavement markings), and bicycle signal detection (using bicycle-oriented loop detectors or push buttons).

ID #	Goals and Supportive Policies/Programs
Policy M-3.7	Bicycle and Pedestrian Facilities . The City shall evaluate new commercial, multifamily residential, and mixed-use development projects to ensure that the project provides bicycle and pedestrian facilities approved by the Community Development Department, adjacent to the project site. Improvements could include secure bicycle parking, streetlights, street furniture, landscaping, trash receptacles, pedestrian-scaled lighting fixtures, shade, and public art.
Policy M-3.8	Pedestrian Safety at Intersections. The City shall implement the Active Transportation Plan to enhance pedestrian safety with pedestrian countdown displays at signalized intersections, signal timing that minimizes pedestrian wait times and provides adequate crossing times, crosswalks at all approaches, continental and other high-visibility crosswalk striping, corner curb extensions, and perpendicular ADA-standard curb cuts on all corners.
Policy M-3.9	Sidewalk Width. The City shall implement the Downtown and El Camino Real Specific Plan to expand the sidewalk widths along Broadway and El Camino Real to accommodate outdoor dining, sidewalk furniture, and better pedestrian access to create a more inviting atmosphere.
Policy M-3.10	Safe Routes to Schools . The City shall coordinate with the school district and parent organizations to support facility construction and new programs, including seeking State and Federal funds, to ensure that Millbrae children can walk or bike to school safely.
Policy M-3.11	Shared Electric Bikes and Scooters. The City shall designate locations for mobility hubs and modify existing city infrastructure to accommodate shared bicycles, electric bikes and scooters that provide last-mile solutions to residents and commuters. Infrastructure enhancements include dedicated off-street parking spaces and on-street corrals to accommodate shared electric bike and scooter parking and prevent conflicts with pedestrians.
Goal M-4	Ensure an adequate supply of parking that provides safe and efficient circulation.
Policy M-4.1	Parking Management Plan. The City shall prepare and implement a parking management plan for the specific plan areas that considers the use of all available tools, including parking enforcement, to address parking issues within the plan areas.
Policy M-4.2	Reduce Parking Encroachment into Neighborhoods. The City shall continue to explore new methods to prevent or reduce parking encroachment from commercial areas into existing neighborhoods, including residential parking permit programs.
Policy M-4.3	Downtown Parking Supply Management. The City shall consider active parking management to expand downtown parking supply, including, parking reservation systems, wayfinding, digital real-time parking availability signs, priced parking, and potential parking structures and partnerships with new developments to provide parking available to the public.
Policy M-4.4	Parallel Parking on Broadway. The City shall consider implementing parallel parking on Broadway (consistent with the recommendations of the Downtown and El Camino Real Specific Plan) to allow for increased sidewalk widths, subject to further study of parking provisions for adjacent businesses
Policy M-4.5	Shared Use of the Millbrae Station Parking Facilities. The City shall work with Caltrain and BART to support the shared use of the Millbrae Station parking facilities for use during off-peak periods, such as visitors who are dining and shopping in Millbrae during evening hours and on weekends.
Policy M-4.6	Electric Vehicle Charging Stations. The City shall work with large employers to expand EV charging in existing buildings and within public parking areas to incentivize EV ownership.
Policy M-4.7	Flexible Parking Structures. The City shall encourage new parking structures to be designed with the flexibility to evolve into another use that can accommodate infill development and reuse, if parking demand decreases or can be fulfilled using other nearby facilities.
Policy M-4.8	Parking Lot and Garage Design. The City shall require new development to design parking lots and garages to be located away from the street, landscaped, and have directional lighting or other lighting techniques to minimize light and glare impacts on surrounding uses.
Policy M-4.9	Clean Air Vehicle Parking . The City shall require all new development to provide parking spaces devoted to clean air vehicles.
Policy M-4.10	Bicycle Parking. The City shall require short- and long-term bicycle parking for new development on all land uses, except for single-family dwellings.

ID #	Goals and Supportive Policies/Programs
Policy M-4.11	City Parking Authority. The City Parking Authority shall oversee, manage, operate, and potentially construct, acquire, and finance public parking facilities in the city to increase the availability of parking spaces in the city, support economic development, and improve parking accessibility.
Goal M-5	Implement transportation demand management strategies and programs to reduce vehicle miles traveled, traffic congestion, and parking demand.
Policy M-5.1	Countywide TDM Programs Participation. The City shall continue to participate in countywide TDM programs to assist employers and employees in reducing the use of single-occupancy vehicles and promoting and incentivizing the use of transit, active transportation (i.e., non-motorized transportation), and carpooling/vanpooling.
Policy M-5.2	San Mateo County Congestion Management Program. The City, in coordination with the City/County Association of Governments of San Mateo County (C/CAG) as the designated Congestion Management Agency for the County, shall implement the County Congestion Management Program and the Land Use Impact Analysis Program, otherwise known as the Transportation Demand Management (TDM Policy). The TDM Policy establishes project review thresholds, vehicle trip reduction and mode share targets, monitoring and reporting requirements, and TDM measures.
Policy M-5.3	Bay Area Commuter Benefits Program . The City shall continue to support the Bay Area Commuter Benefits Program, to improve air quality, reduce emissions of greenhouse gases and other air pollutants, and to decrease traffic congestion in the Bay Area by encouraging employees to commute by transit, carpooling, biking, and other alternative modes.
Policy M-5.4	Car Sharing. The City shall explore opportunities to partner with car sharing companies to establish designated car sharing spaces and vehicles in the City, and the City shall explore opportunities for car sharing companies to occupy any required parking spaces on private property provided the cars are made available to the general public.
Policy M-5.5	Electric Transportation Network Company Vehicles. The City shall encourage the use of EV Transportation Network Company Vehicles (TNCs) in the community.
Goal M-6	Develop balanced housing and employment opportunities to reduce vehicle miles traveled
Policy M-6.1	Agency Coordination. The City shall coordinate with San Francisco International Airport, the High- Speed Rail Authority, Caltrans, the Peninsula Corridor Joint Powers Board, Metropolitan Transportation Commission (MTC), the San Francisco Bay Area Rapid Transit District, the San Mateo County Transit District, the City/County Association of Governments of San Mateo County and other transit providers and transportation agencies, to meet the travel needs of Millbrae residents, workers, and visitors.
Policy M-6.2	Transportation and Transit Funding. The City shall encourage regional agencies to provide adequate funding for local roadway and transit improvements through sales tax initiatives, traffic impact fees, and other measures when necessary.
Policy M-6.3	Regional Traffic Impacts. The City shall require projects to comply with the requirements of the Congestion Management Plan (CMP) (as defined by C/CAG).
Policy M-6.4	Regional Traffic Improvements. The City shall support all appropriate measures necessary to improve regional traffic on U.S. 101, Interstate 280, and El Camino Real (State Route 82) as related to traffic conditions in Millbrae.
Policy M-6.5	Regional Transportation Impact Fee. The City shall consider working with and other jurisdictions to develop a Strategic Plan to identify and fund major regional projects, including adoption of a regional or sub-regional transportation impact fee.
Implementation	Programs
Program A	Street and Street Signage Maintenance Program. The City shall continue to implement the Street Maintenance Program using the computerized model for street maintenance to address local street maintenance, repair, and resurfacing needs. Update street signage, such as for time restrictions and weight limits, where appropriate, for residential neighborhood streets.

ID #	Goals and Supportive Policies/Programs
Program B	Active Transportation Plan. The City shall update the Active Transportation Plan every five years to accomplish the following: Assess the needs of pedestrians and cyclists in Millbrae; identify improvements to infrastructure and programs; ensure eligibility to certain transportation funding sources; and to coordinate pedestrian and bicycle local actions and regional projects
Program C	Parking Standards. Based on monitoring of parking supply and demand for new development, the City shall review and update the parking requirements for properties within the Specific Plan areas as needed.
Program D	Parking Management Plan. Based on the findings from appropriate parking studies, the City shall prepare and implement a Parking Management Plan for the Specific Plan Areas, focused on the Downtown and Millbrae Station areas, that considers the use of parking enforcement to address parking issues within the Specific Plan, including installation of parking meters in the downtown, residential parking permit programs, wayfinding, in-lieu fee, and other innovative parking management solutions.
Program E	TDM Monitoring and Reporting . The City shall continue to regularly monitor and report on traffic levels and intersection capacity as a part of the County Congestion Management Program and the Land Use Impact Analysis Program.
Program F	Funding of Regional Transit Projects. The City shall continue to implement agreements with BART and San Francisco International Airport for the funding of improvements required to mitigate regional transit projects.
Source: Millbrae,	City of. 2022. Millbrae Draft 2040 General Plan Mobility and Circulation Element.

Health, Safety, and Hazardous Materials Element

The Health, Safety, and Hazardous Materials Element (Safety Element), another component of the current General Plan, would also be updated to ensure the Millbrae General Plan complies with current State law. Goals and policies in the Safety Element address updates to legislation concerning new development and wildfire risk⁷ and other climate change related hazards. These updates to the General Plan goals and policies are designed to reduce environmental risk to new development as they would target potential impacts respective to air quality, greenhouse gas pollutants, flooding due to sea level rise or heavy precipitation, and wildfire risk. The Safety Element also addresses hazardous materials, geologic and seismic, and aircraft hazard risks as well as disaster preparedness, emergency response, law enforcement services, and noise exposure.

PROPOSED HEALTH, SAFETY, AND HAZARDOUS MATERIALS ELEMENT GOALS, POLICIES, AND PROGRAMS

Goals and supportive policies and programs of the proposed General Plan Health, Safety, and Safety Element are shown in Table 2-6.

⁷ Pursuant to compliance with SB 747.

ID #	Goals and Supportive Policies/Programs
Goal HSHM-1	Improve the health of and quality of life for all Millbrae residents.
Policy HSHM-1.1	Health in All Policies. The City shall prioritize the overall health of Millbrae residents in its strategies, programs, daily operations, and practices.
Policy HSHM-1.2	Address Health Inequities. The City shall address health inequities in Millbrae by striving to remove barriers to healthy living, avoiding disproportionate exposure to unhealthy living environments, and providing a high quality of life for all residents, regardless of income, age, or ethnicity.
Policy HSHM-1.3	Physical Activity and the Built Environment. The City shall support new developments or infrastructure improvements in existing neighborhoods that enable people to drive less and walk, bike, or take public transit more.
Policy HSHM-1.4	Smoking Ordinance. The City shall continue to implement the smoking ordinance adopted by City Council July 2019 and effective January 1, 2020, that prohibits smoking in multifamily housing, within a 40-foot radius of any multifamily unit, and within any enclosed or unenclosed multifamily residence common area. Additional considerations to add to the smoking ordinance may include prohibiting smoking in outdoor dining areas, and within 20 feet of entryways to smoke-free buildings.
Policy HSHM-1.5	Farmers' Markets. The City shall continue to support farmers' markets in Millbrae.
Policy HSHM-1.6	Recreation for Active Adults. The City shall periodically assess recreational opportunities for active adults and modify programming to ensure that their needs are being met.
Goal HSHM-2	Ensure government agencies, residents, and businesses are prepared for an effective response and recovery in the event of emergencies or disasters.
Policy HSHM-2.1	Emergency Response. The City shall continue to provide essential emergency public services during natural catastrophes.
Policy HSHM-2.2	Adequate Police and Fire Services. The City shall continue to support the San Mateo County Sheriff's Department and the Central County Fire Department in maintaining adequate manpower, equipment, facilities, and resources to respond to any fire or other localized emergency within the city.
Policy HSHM-2.3	Critical Use Facilities. The City shall ensure that critical use facilities that are important to protecting health and safety are designed or retrofitted to remain operational during an emergency or disaster.
Policy HSHM-2.4	Mutual Aid Agreements. The City shall continue to participate in mutual aid agreements to ensure adequate response to major emergencies and disasters.
Policy HSHM-2.5	Disaster Preparedness Training and Planning. The City shall support disaster preparedness training and planning in cooperation with other public agencies and appropriate public-interest organizations to maintain peace and security of property following an emergency or disaster.
Policy HSHM-2.6	Local Hazard Mitigation Plan. The City shall support, maintain, and implement the San Mateo County and City-specific Hazard Mitigation Plan mitigation initiatives that promote resiliency to seismic hazards, wildfire threats, risks from electrical transmission systems, dam inundation from the SFPUC Watershed, sea level rise, and increased flooding as a result of climate change.
Policy HSHM-2.7	Disaster Awareness. The City shall publicize disaster plans and promote resident preparedness for self-action in case of a major disaster or emergency.
Policy HSHM-2.8	Community Alert System. The City shall continue to support San Mateo County's efforts to maintain and upgrade mass communications systems to effectively notify people during disasters and emergencies and shall encourage all residents and employees to participate in the SMC Alert program.
Policy HSHM-2.9	High Occupancy Structures Emergency Plans. The City shall require high occupancy structures t have emergency plans reviewed and approved by Central County Fire Department.

Table 2-6 Millbrae Health, Safety, and HazMat Element Goals, Policies, and Programs

ID #	Goals and Supportive Policies/Programs
Policy HSHM-2.10	Emergency Access and Evacuation Routes. The City shall ensure that appropriate access for emergency services is provided to all areas of the City including the Spur Trail. The City shall evaluate evacuation routes to ensure the safe evacuation of neighborhoods, especially those with limited access or that use underpasses. Alleys that provide egress from rear exits must remain clear to provide unobstructed emergency ingress and egress and appropriate access for emergency services.
Goal HSHM-3	Improve the sustainability and resiliency of the City through continued efforts to reduce the causes of and adapt to climate change.
Policy HSHM-3.1	Reduce Climate Change Impacts. The City shall support plans, standards, regulations, incentives, and investments to reduce the impacts of climate change as outlined in the 2020 Climate Action Plan.
Policy HSHM-3.2	Monitor Climate Change Risks. The City shall monitor information from regional, State, and Federal agencies on the effects of climate change, including rising sea levels in the San Francisco Bay, to determine if the City should implement additional adaptation strategies.
Policy HSHM-3.3	Climate Adaptation Collaboration. The City shall continue to collaborate with local, regional, State, and Federal agencies; business and property owners; and residents to address and adapt to potential effects of climate change, particularly sea level rise.
Policy HSHM-3.4	Sea Level Rise. The City shall establish standards that require new development projects to address sea level rise and flood risks that include the use of shoreline barriers, waterfront setback requirements, and minimum elevations for residential units.
Policy HSHM-3.5	Earthquake Resiliency. The City shall actively engage in planning methods and practices to address potential impacts from earthquakes.
Policy HSHM-3.6	Sustainable Building and Site Design Practices. The City shall require new development to employ sustainable building and site design practices, consistent with California Green Building Standards Code (CALGreen) and the City of Millbrae Municipal Code Title 9 Buildings and Fire Regulations, Chapter 9.50 Energy Code and Chapter 9.35 Green Building Code including requirements for sustainable reach standards.
Policy HSHM-3.7	Capital Improvements for Safety. The City shall continue to give priority to capital improvement projects required to maintain an acceptable level of safety throughout the community and take measures to prevent damage to the City's infrastructure and emergency facilities resulting from natural hazards.
Policy HSHM- 3.8	Resiliency Through Development and Design. The City shall require appropriate setback and building elevation requirements for properties located along the Bayshore, lagoons, and in other low-lying areas that are susceptible to the effects of sea level rise to support resiliency through design.
Goal HSHM-4	Protect life and minimize property damage from potential flooding.
Policy HSHM-4.1	Flood Hazard Mitigation. The City shall cooperate and coordinate with San Mateo County, SFO, and other jurisdictions and agencies involved in the mitigation of flood hazards from sea level rise and major flood events.
Policy HSHM-4.2	FEMA Flood Insurance Rate Maps. The City shall comply with Federal Emergency Management Agency (FEMA) to ensure that Federal Insurance Rate Maps correctly depict flood hazard areas.
Policy HSHM-4.3	Critical Facility Location. The City shall strive to site critical public facilities, including hospitals and healthcare facilities, emergency shelters, police and fire stations, and emergency communications facilities outside of 100-year flood zones.
Policy HSHM-4.4	Storm Drainage System. The City shall continue to work with the San Mateo County Flood Control District to improve and upgrade the storm drainage system. The City shall consider integrating green infrastructure into the storm drainage system in accordance with the City's adopted Green Infrastructure Plan, particularly in downtown and along the El Camino Real corridor, to reduce stormwater runoff and to reduce the potential for flooding.

ID #	Goals and Supportive Policies/Programs
Policy HSHM-4.5	New Development in Floodplains. The City shall implement Federal, State, and local requirements for new construction in floodplain areas to ensure that future flood risks to life and property are minimized.
Goal HSHM-5	Protect life and minimize property damage from potential seismic hazards and landslides.
Policy HSHM-5.1	Seismic Safety. The City shall continue to maintain and enforce appropriate standards to ensure existing and new development is located, designed, and constructed to minimize the risk of loss of life and property from seismic hazards.
Policy HSHM-5.2	Residential Seismic Upgrades. The City shall encourage owners of residential buildings with known structural defects such as unreinforced garage openings, "soft story" construction, unbolted foundations, and inadequate sheer walls to take steps to remedy the problem by retrofitting buildings to meet current life-safety engineering standards.
Policy HSHM-5.3	Seismic Modifications to Residential Facilities. The City shall require that any residential use that is being increased by a specific threshold as defined in the Building Code shall conform to current Building Code seismic standards.
Policy HSHM-5.4	Geotechnical and Structural Analysis for Steep Slopes. Prior to construction of a new building or addition, the City shall require a geotechnical report for construction on slopes, unless it is demonstrated to Building Official by the licensed professional of the structural design that a geotechnical report is unnecessary.
Policy HSHM-5.5	Infrastructure and Utilities. The City shall require infrastructure and utility lines to be designed to withstand significant displacement in the event of a major earthquake in order to maintain and restore service.
Policy HSHM-5.6	Critical Facility Seismic Upgrade. The City shall encourage seismic upgrades to critical public facilities, including hospitals and healthcare facilities, emergency shelters, police and fire stations, emergency communications facilities, and other important facilities that do not meet the most recent building code seismic standards. Where upgrades are not economically feasible the City shall encourage the relocation and/or reconstruction of facilities.
Policy HSHM-5.7	City Facility Seismic Upgrade. The City shall upgrade existing City facilities that do not meet the most recent existing building code seismic standards. Where upgrades are not economically feasible, the City shall consider the relocation and/or reconstruction of facilities.
Policy HSHM-5.8	Geotechnical Studies. The City shall require special geotechnical studies for new construction or additions in areas where there is a known earthquake fault zone or geotechnical hazard, such as the Serra Fault.
Policy HSHM-5.9	Bay Fill. The City shall require new development on Bay fill to be protected against the effects o liquefaction and/or subsidence through proper building design and construction techniques.
Policy HSHM-5.10	Soil Stabilization. The City shall require projects in hillside areas that include land alteration or vegetation removal to prepare drainage and erosion control plans that show how the project will prevent soil erosion by retaining and replanting vegetation and siting development to minimize grading and landform alteration.
Policy HSHM-5.11	Slope Protection. The City shall require property owners to provide slope protection by retainin and replanting vegetation on their property, and to maintain v-ditches and other private drainage systems. The City shall provide information regarding appropriate native, drought tolerant, and fire-resistant plant species
Goal HSHM-6	Minimize exposure to hazards associated with aircraft using the San Francisco International Airport.
Policy HSHM-6.1	Land Use Safety Compatibility and Airspace Protection Criteria. The City shall consider all applicable Federal statutes (including 49 U.S.C. 47107), Federal regulations (including 14 Code o Federal Regulations 77 et seq.), the Federal Aviation Administration (FAA) Airport Compliance Manual, FAA Advisory Circulars, other forms of written guidance, and State law with respect to criteria related to land use safety and airspace protection when evaluating development applications within the Airport Influence Area of the San Francisco International Airport and Mills-Peninsula Medical Center helipad.

ID #	Goals and Supportive Policies/Programs
Policy HSHM-6.2	Airport Safety. The City shall regulate land uses and building height within the Airport Influence Area of the San Francisco International Airport, including Millbrae Station Specific Plan area and the Downtown and El Camino Real Specific Plan area, in compliance with FAR Part 77 height restriction standards, in accordance with Airport Land Use Commission guidelines to assure safety of aircraft, persons, and property near the Airport.
Policy HSHM-6.3	Federal Aviation Administration Requirements for Development. The City shall require development projects within the Airport Influence Area designated in the Airport Land Use Compatibility Plan of the San Francisco International Airport to comply with all applicable Federal statutes (including 49 U.S.C. 47107), Federal regulations (including 14 Code of Federal Regulations 77 et seq.), the FAA's Airport Compliance Manual, FAA Advisory Circulars, other forms of written guidance, and State law with respect to criteria related to land use safety and airspace protection. Cranes and other equipment used to construct the building are also required to comply with all FAA federal statutes.
Policy HSHM-6.4	Airport Land Use Compatibility Plan Land Use and Development Consistency. The City shall ensure that all future land use actions and/or associated development conforms to the relevant height, aircraft noise, and safety policies and compatibility criteria contained in the most recently adopted version of the Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.
Policy HSHM-6.5	Airport Land Use Commission Review. The City shall ensure all applicable long-range plans and associated amendments and ordinances are reviewed by the City/County Association of Governments Board of Directors, acting as the San Mateo County's Airport Land Use Commission, for a determination of consistency with the most current Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport, as required by State law.
Policy HSHM-6.6	Airport Flood Pumps. The City shall continue to coordinate with San Francisco International Airport in assuring adequate and well-maintained flood pumps.
Policy HSHM-6.7	Airport Noise Mitigation. The City shall continue to work with the relevant agencies, including the Airport Land Use Commission and the SFO Community Roundtable, to ensure ongoing reduction of airport noise, including low-frequency ground-borne noise.
Policy HSHM-6.8	SFO Residential Sound Insulation Program. The City shall support the continuation of the Residential Sound Insulation Program to reduce the noise impacts for dwellings impacted by aircraft noise 65 dBA or greater. The City shall encourage SFO to fill any gaps that might occur in Federal funding until all eligible homes have been insulated.
Policy HSHM-6.9	Low-Frequency Ground-borne Aircraft Noise Mitigation. The City shall require new development to include development and site planning mitigation measures to reduce low-frequency ground-borne noise from inbound and outbound aircraft at SFO.
Goal HSHM-7	Protect people and the environment from exposure to hazardous materials and minimize risks associated with the use, storage, transport, and disposal of hazardous materials.
Policy HSHM-7.1	Contaminated Site Assessment. The City shall require development proposed on a potentially contaminated site to take appropriate steps to assess hazards. If the site is found to be contaminated with hazardous substances, the City shall require the project applicant to take appropriate measures to protect the health and safety of site users and the greater Millbrae community.
Policy HSHM-7.2	Hazardous Materials Education Resources. The City shall continue to provide, and support efforts by San Mateo County to provide, educational resources to residents and businesses that promote best practices for the use, storage, transportation, and disposal of hazardous materials to ensure public safety.

ID #	Goals and Supportive Policies/Programs
Policy HSHM-7.3	Hazardous Materials Management. The City shall require uses, including biotechnology, life science, and industrial uses that involve the handling and use of hazardous materials to adhere to all applicable Federal, State and local regulations for qualifying hazardous materials, seek consultation with the San Mateo County Environmental Health Department, and apply for applicable permits for any regulated substance that may pose a threat to public health and safety or the environment.
Goal HSHM-8	Minimize potential fire hazard risk to lives and properties.
Policy HSHM-8.1	Adequate Staffing and Equipment. The City shall ensure that growth and development does not outpace the expansion of the Central County Fire Department staffing, facilities, equipment, and resources and shall require the payment of development impact fees to fund new public safety facilities or improvements to existing public safety facilities to maintain the City's existing level of service.
Policy HSHM-8.2	Adequate Water Supply for Fire Suppression. The City shall require new development to have adequate water supplies to meet the fire-suppression needs of the project without compromising existing fire suppression services to existing uses.
Policy HSHM-8.3	Fire Access and Building Standards. The City shall continue to include the Central County Fire Department in the review of new development proposals to ensure new projects adequately address fire access and building standards.
Policy HSHM-8.4	Fire Prevention Education. The City shall support efforts by the Central County Fire Department to maintain and implement a fire prevention and safety education program for Millbrae residents and businesses. The Central County Fire Department shall ensure that the needs of high-risk population groups, such as seniors and non-native English speakers, are met with tailored programs.
Policy HSHM-8.5	Open Space Management. The City shall ensure open space maintenance and emergency access to reduce fire risk through City operations, enforcement of City regulations, and cooperation with other responsible agencies.
Goal HSHM-9	Provide high-quality law enforcement services to ensure a safe community.
Policy HSHM-9.1	Adequate Staffing and Facilities. The City shall support the San Mateo County Sheriff's Office in ensuring adequate staffing and facilities for the Millbrae Police Bureau to achieve desired levels of public safety.
Policy HSHM-9.2	Community Policing Strategies. The City shall continue promoting community policing strategies that support community partnerships and problem-solving techniques that build public trust and proactively address public safety issues.
Policy HSHM-9.3	School Security and Safety. The City shall encourage the San Mateo County Sheriff's Office to collaborate with local school districts to study and implement measures that enhance the security of schools and the safety of students, teachers, and administrators.
Goal HSHM-10	Achieve an acceptable noise environment by minimizing noise exposure and ground vibration.
Policy HSHM-10.1	Noise Sensitive Uses. The City shall discourage noise sensitive uses, (e.g., residences, schools, hospitals, libraries, religious institutions, and convalescent homes) from locating near major sources of noise.
Policy HSHM-10.2	Noise Standards. The City shall require new development to comply with the Exterior Noise Compatibility Standards for Various Land Uses (Table HSQL-1) and the Future Noise Contours Map (Figure 10-1).
Policy HSHM-10.3	Noise Source Control. The City shall continue to work with property owners to control noise at its source by maintaining community noise levels and ensuring that noise levels do not exceed applicable standards.
Policy HSHM-10.4	Noise Studies. The City shall require a project-level noise study for new development proposed near major noise sources (e.g., major roadways, rail lines, aircraft overflight zones, or other major non-transportation noise sources).

ID #	Goals and Supportive Policies/Programs
Policy HSHM-10.5	Interior Noise Review for Multiple, Loud Short-Term Events. For new development in areas that would be subject to frequent, high-noise events (such as aircraft take offs and landings, train or truck traffic), the City shall assess potential noise impacts on sensitive receptors and consider these impacts when reviewing development proposals for approval.
Policy HSHM-0.6	Operational Noise. The City shall require commercial, industrial, and mixed-use developments to implement operational noise mitigation measures to reduce potential impacts to adjacent sensitive land uses when operational noise exceeds thresholds.
Policy HSHM-10.7	Construction Noise. The City shall require new development to evaluate potential construction noise impacts on nearby sensitive uses as part of the CEQA analysis and to implement any required mitigation measures to minimize impacts on these uses.
Policy HSHM-10.8	Protection from SFO Noise. The City shall discourage outdoor activities or uses in areas within the 70 dBA CNEL contour line of the San Francisco International Airport (as mapped in the Airport Land Use Compatibility Plan) where people could be exposed to hazardous noise levels.
Policy HSHM-10.9	Airport Disclosure Notices. The City shall require that all new development comply with real estate disclosure requirements of State law. Section 11010 of the Business and Professions Code requires people offering subdivided property for sale or lease to disclose the presence of all existing and planned airports within two miles of the property (Cal. Bus. and Prof. Code Section 110010(b)(13).
Policy HSHM-10.10	Partnering with SFO on Noise Minimization. The City shall continue to partner with SFO to collaborate on potential mitigation to minimize airport noise within the community, including improvements on the land owned by SFO, to serve as a noise buffer through enhanced landscaping and trees.
Policy HSHM-10.11	Compliance with State Noise Insulation Standards. The City shall continue to enforce relevant Noise Insulation Standards contained in Title 24 of the California Code of Regulations.
Policy HSHM-10.12	Transportation Project Noise. When evaluating proposals for transportation projects, the City shall require the project applicant to minimize noise impacts through the implementation of mitigation measures, so the resulting noise levels do not exceed the City's "normally acceptable" noise standard. The City shall encourage design strategies and alternative noise reduction methods in lieu of sound walls along transportation corridors to enhance aesthetics while still mitigating noise impacts.
Policy HSHM-10.13	Transportation Agency Coordination. The City shall work with the City/County Association of Governments of San Mateo County, CalTrans, SFO, BART, Caltrain, California High Speed Rail Authority, and other agencies to mitigate transportation-related noise impacts on sensitive land uses and adjacent properties and neighborhoods.
Policy HSHM-10.14	Vibration Impact Assessment for Construction Projects. The City shall require that all new development using piling driving construction applications provide a Vibration Impact Assessment prior to commencing construction on the project. The Vibration Impact Assessment shall provide the timeline, anticipated impacts, and mitigation to minimize the effects of vibration caused by onsite construction.
Implementation Prog	grams
Program A	Periodic Emergency Exercises. The City shall annually conduct emergency exercises in cooperation with San Mateo County.
Program B	Local Hazard Mitigation Plan. The City shall participate in the Local Hazard Mitigation Plan update, as led by San Mateo County, by annually reporting activities through the San Mateo County annual reporting tool every September 1st. The City shall also update its LHMP Annex every five years concurrent to the County's update of the LHMP.
Program C	Public Information. The City shall prepare and implement a public information program to keep the community informed about the scope and nature of local safety hazards, disaster plans, and emergency response, which includes use of the City's Quarterly Recreation Activity Guide, MCTV, the City website, use of the SMC Alert System, and social media.

ID #	Goals and Supportive Policies/Programs
Program D	Climate Action Plan Update. The City shall update the Climate Action Plan to reflect new baseline targets and reduction measures, as well as current best practices for implementing resilient, sustainability, and adaptation.
Program E	Flood Damage Prevention Ordinance. The City shall update and maintain the Flood Damage Prevention Ordinance to regulate construction within special flood hazard areas.
Program F	Storm Drainage Maintenance Program. The City shall continue its program of regular maintenance to remove silt and debris from the storm drain system.
Program G	Grading Ordinance Revisions. The City shall revise the Grading Ordinance as necessary to ensure development in steep slope terrain reflects current Building Code requirements and standards
Program H	Noise Ordinances. The City shall prepare, adopt, and continually enforce a Noise Ordinance to ensure a level of noise acceptable to a reasonable person residing in Millbrae's neighborhoods
Program I	Staff Training. The City shall ensure City staff enforcing the Noise Ordinance are trained in the use of noise measurement equipment to enforce noise standards throughout the city.
Program J	Noise Studies. The City shall require noise studies for all new development as part of the CEQA process that determine exterior noise exposure and exterior noise standard compatibility with respect to the noise standards identified in Table HSQL-1 (Exterior Noise Standards for Various Land Uses) and use the Future Noise Contours Map (Figure 10-1) to determine whether potential noise exposure impacts could occur. For projects located in areas that would be at or below the highest level of exterior noise exposure that is regarded as "Normally Acceptable" as shown in Table HSQL-1, no further study should typically be required; however, for those projects that would be in the "Conditionally Acceptable" noise exposure range shown in Table 7-1, the City shall require a detailed noise study and determine a noise compatibility threshold and mitigation measures based on the project-specific noise study. In such cases, the City may require noise attenuating features such as sound barriers, building setbacks, the use of closed windows and the installation of heating and air conditioning ventilation systems, and the installation of noise attenuating windows and wall/ceiling insulation.
Program K	Sound Barriers Along Interstate 280. The City shall continue to work with Caltrans to install sound barriers along Interstate 280.

Natural Resource Conservation Element

The Natural Resource Conservation Element, another component of the current General Plan, would also be updated. The purpose of the Natural Resource Conservation Element is to preserve, protect, and enhance the natural resources that make Millbrae a unique place. The Natural Resource Conservation Element addresses a broad range of topics, including habitat and open space, water resources, air quality, energy conservation, waste reduction, and the reduction of GHG emissions. Other goals of the Natural Resource Conservation Element are to improve water and air quality and to conserve energy through programs that reduce consumption and promote sustainable alternatives. It should be noted that the existing City framework for reducing GHG emissions, including the established City GHG reduction targets, is included in the separate Millbrae Climate Action Plan (CAP).

PROPOSED NATURAL RESOURCE CONSERVATION ELEMENT GOALS, POLICIES, AND PROGRAMS

Goals and supportive policies and programs of the proposed General Plan Natural Resource Conservation Element are shown in Table 2-7.

Table 2-7Millbrae Natural Resource Conservation Element Goals, Policies, and
Programs

ID #	Goals and Supportive Policies/Programs
Goal NRC-1	Protect, enhance, and restore undeveloped open space areas and biological resources so they can be sustained and remain viable
Policy NRC-1.1	Open Space Preservation and Maintenance . The City shall continue to preserve open space lands in the city, including scenic resources and environmentally-sensitive habitat areas, and maintain them as necessary to protect public health, safety, and welfare.
Policy NRC-1.2	Permanent Open Space Dedication. The City shall require permanent dedication of open space areas with habitat, visual, recreational, or archaeological value as a condition of new development approval. These areas should be owned and maintained by private parties unless they are appropriate for use as trails or other public-access uses.
Policy NRC-1.3	Open Space Resource Acquisition. The City shall explore possible resources for public acquisition of parcels with high habitat, visual, archaeological, or recreational values, including State and public trust funds, leases for private open space use, and additional bond measures.
Policy NRC-1.4	Visual Easements. The City shall use visual or public-access easements and building setbacks to protect open space resources while allowing new development on private parcels.
Policy NRC-1.5	Collaboration for Open Space Acquisition. The City shall work with non-profit organizations and other public agencies to acquire and maintain open space areas, perform creek restoration, and support other projects related to open space preservation.
Policy NRC-1.6	Open Space Funding. The City shall work with local, regional, and State agencies, non-profit and community organizations, foundations, and grant sources to provide funding for open space land acquisition, maintenance, and programming.
Policy NRC-1.7	Open Space Improvement. The City shall strive to ensure that any improvements to open space areas maintain the open space and do not adversely impact habitats, views, and other open space resources.
Policy NRC-1.8	Open Space Access. The City shall pursue public access to open space lands through the Tentative Map process to require dedications, easements, and other mechanisms in the Conditions of Approval for a project.
Policy NRC-1.9	Open Space Access Maintenance. The City shall maintain and improve access to open space areas by clearly delineating areas that are appropriate for public use and access and differentiating them from those areas to be protected from human disturbance. In areas where public use is appropriate the City shall provide access points and accessible design features (e.g., trails and related facilities).
Policy NRC-1.10	Habitat Protection. The City shall protect sensitive biological resources, including habitats of State and Federally designated sensitive, rare, threatened, and endangered plant, fish, and wildlife species from urban development and incompatible land uses through analysis in the CEQA and permitting process. If new development results in impacts to any of these resources, loss of habitat should be fully compensated on-site whenever it is feasible to do so. If off-site mitigation is necessary, it should occur within the city of Millbrae whenever it is feasible to do so.
Policy NRC-1.11	Development Setbacks . The City shall protect lands adjacent to sensitive habitat areas as public or private permanent open space through dedication or easements. The City shall ensure new development adjacent to such areas provides adequate building setbacks to buffer against potential impacts, with adequate access easements to allow for necessary open space maintenance.
Policy NRC-1.12	Environmental Education. The City shall promote opportunities for environmental education to encourage habitat conservation for residents, schools, and visitors.
Goal NRC-2	Improve water quality by protecting surface water resources and restoring creeks and rivers to their natural state.
Policy NRC-2.1	San Mateo Countywide Water Pollution Prevention Program. The City shall continue to participate in the San Mateo Countywide Water Pollution Prevention Program.

ID #	Goals and Supportive Policies/Programs
Policy NRC-2.2	Storm Water National Pollutant Discharge Elimination System (NPDES). In coordination with the San Mateo City and County Association of Governments, the City shall continue to implement measures consistent with the Municipal Regional Stormwater NPDES Permit.
Policy NRC-2.3	Best Management Practices to Reduce Water Pollution. The City shall require implementation of Best Management Practices consistent with the Municipal Regional Stormwater NPDES Permit to reduce non-point source pollutants in the drainage system.
Policy NRC-2.4	Green Infrastructure. The City shall ensure all new developments implement green infrastructure, per the City's Green Infrastructure Plan, adopted by City Council in September 2019. Development, including public improvement projects, shall include "green" stormwater collection and treatment and employ Low Impact Development (LID) features that minimize surface water runoff and pollutants. LID features may include bioretention systems, swales, green roofs, infiltration systems, and permeable pavers.
Goal NRC-3	Conserve water resources to provide for long-term community water needs
Policy NRC-3.1	Water Conservation. The City shall require water conservation in existing and new development consistent with Urban Water Management Plan (UWMP) and continue to work with the Bay Area Water Supply and Conservation Agency (BAWSCA) on a regional approach to water conservation. The City will implement cost-effective conservation strategies and programs that increase water use efficiency, including providing incentives for adoption of water-efficiency measures.
Policy NRC-3.2	Indoor Water Use. The City shall require project applicants to comply with the California Green Building Standards Code (CALGreen) regulations to conserve indoor water use.
Policy NRC-3.3	Water Efficient Landscaping. The City shall continue to require that new or retrofitted landscapes comply with the current Water Efficient Landscape Ordinance (WELO).
Policy NRC-3.4	Recycled Water. The City shall encourage the use of recycled water for parks and private landscapes when available and encourage greywater ready construction.
Policy NRC-3.5	Recycled Water Feasibility. The City shall continue to pursue recycled water treatment facilities and implement a recycled water facility and program when financially feasible. The City shall require new development citywide to install "purple pipe" infrastructure both onsite and in the streets fronting the project site for future use of recycled water when available.
Policy NRC-3.6	Water Efficiency Education. The City shall continue to work with BAWSCA, the SFPUC and other regional partners to host community workshops that educate residents and business owners about reducing water consumption through efficiency and conservation, including promoting existing and new rebate programs for water efficient appliances, fixtures and drought tolerant landscape.
Policy NRC-3.7	Storm Water National Pollutant Discharge Elimination System (NPDES). In coordination with the San Mateo City and County Association of Governments, the City shall continue to implement measures consistent with the Municipal Regional Stormwater NPDES Permit.
Policy NRC-3.8	Water Quality Monitoring. The City shall regularly measure and monitor water quality in Millbrae's surface water to ensure maintenance of high-quality water for consumption.
Goal NRC-4	Reduce emissions of criteria air pollutants and reduce exposure to toxic air contaminants and fine particulate matter to improve regional air quality and protect the health of Millbrae residents.
Policy NRC-4.1	Ambient Air Quality Standards. The City shall continue to work with the California Air Resources Board and the Bay Area Air Quality Management District (BAAQMD) to meet State and Federal ambient air quality standards.
Policy NRC-4.2	Reduce Construction and Operational Emissions. The City shall require new development projects to incorporate design or operational features that reduce construction and operational emissions of reactive organic gases (ROG), nitrogen oxides (NOX), and particulate matter (PM10 and PM2.5) to a less than significant level. (

ID #	Goals and Supportive Policies/Programs
Policy NRC-4.3	Minimize Sensitive Receptor Exposure. The City shall work with BAAQMD to evaluate exposure of sensitive receptors to odors, toxic air contaminants (TAC), and fine particulate matter (PM2.5). The City shall also require new development to implement applicable best management practices that will limit exposure of new sensitive receptors to a less than significant level (e.g., daycare facilities, elderly housing, and convalescent facilities).
Policy NRC-4.4	Preferences for Reduced-Emission Equipment. The City shall give preference to contractors using reduced-emission equipment for City construction projects and contracts for services (e.g., garbage collection), as well as businesses that practice sustainable operations.
Policy NRC-4.5	Air Pollution Education. The City shall continue to work with the BAAQMD to educate residents about the health effects of air pollution and continue to support and promote the BAAQMD's Spare the Air Day alerts program to inform residents about actions they can take to help improve air quality and reduce GHG emissions, including replacing wood burning fireplaces and stoves with cleaner alternatives.
Goal NRC-5	Increase renewable energy resource use and encourage energy efficiency practices to reduce community energy use.
Policy NRC-5.1	Energy Efficient Practices and Operations. The City shall promote the efficient energy use in the design, construction, maintenance, and operation of public and private facilities, infrastructure, and equipment.
Policy NRC-5.2	Reduce Heat Island Effect. The City shall encourage efforts and continually evaluate sustainable measures that reduce the heat island effect, reduce energy consumption, and contribute to carbon mitigation including the planting of trees and other vegetation and installation of cool roofs.
Policy NRC-5.3	Zero Net Energy Building. The City shall support opportunities to achieve zero net energy use for new buildings or the retrofitting of existing buildings in accordance with State laws and encourage existing buildings to achieve energy efficiencies.
Policy NRC-5.4	Renewable Energy Sourcing and Storage. The City shall encourage and support the generation, transmission, use, and storage of renewable energy and continue its participation and support for Peninsula Clean Energy.
Policy NRC-5.5	Electric Vehicles. The City shall encourage and support expanding Electric Vehicle (EV) charging stations and the purchase of electric vehicles.
Policy NRC-5.6	Green Building Ordinance. The City shall adopt and apply the most recent Green Building Standards Code (CALGreen) to new municipal, commercial, and residential structures, remodels, and additions. The City shall also consider updates for additional "reach code" mandatory requirements for new development, such as solar hot water systems or cool roofs.
Policy NRC-5.7	Energy Efficient Municipal Buildings. The City shall consider CALGreen Tier 1 energy performance, along with LEED Silver or Gold equivalent status for new municipal buildings to maximize energy efficiency.
Policy NRC-5.8	Energy Efficiency Education. The City shall continue to work with energy utilities and regional partners to educate residents and business owners about renewable energy and energy efficiency, including available programs and incentives, and strategies to help residents and business owners reduce their energy demand and energy-related GHG emissions.
Policy NRC-5.9	Energy Retrofit Incentives and Rebates. The City shall promote participation in residential and commercial energy efficiency programs, including BayREN's programs, San Mateo County Energy Watch and PG&E's or Peninsula Clean Energy's efficient appliance rebates.
Policy NRC-5.10	Energy Audits. The City shall encourage residential and commercial energy audits.
Policy NRC-5.11	Transportation Energy Use Reduction. The City shall encourage smart development, infill development, transportation demand management, and programs which support alternative modes of transportation, including the City's partnership with Commute.org. (

ID #	Goals and Supportive Policies/Programs
Goal NRC-6	Reduce solid waste generation, increase recycling and composting, and provide for the adequate collection and disposal of solid waste.
Policy NRC-6.1	Solid Waste Diversion and Recycling. The City shall encourage increased community participation in recycling and composting programs and weekly collection of recyclables and organic waste to achieve set diversion goals consistent with governing law.
Policy NRC-6.2	Construction and Demolition Waste . The City shall continue to require all developments to comply with the current CALGreen requirements for construction and demolition waste diversion.
Policy NRC-6.3	Integrated Waste Management. The City shall continue to implement the AB 939 Integrated Waste Management Plan to meet the waste diversion requirements of the California Integrated Waste Management Act (AB 939) and related legislation.
Policy NRC-6.4	Sustainable Purchasing Policy. The City shall prioritize purchasing products that are made with postconsumer recycled content; are recyclable, compostable, or reusable; are less toxic than conventional goods; are manufactured locally; and are fairly traded.
Policy NRC-6.5	Solid Waste Diversion Ordinances. The City shall continue to implement the Disposable Food Service Ware Ordinance (Adopted February 23, 2021) and the Single-Use Carryout Bag Ordinance (adopted in 2012) to divert and reduce solid waste and single-use plastics.
Policy NRC-6.6	Waste Management Services. The City shall continue to contract waste management services to provide quality and cost-effective solid waste removal throughout the city and require all residents and businesses to comply with solid waste collection service requirements.
Policy NRC-6.7	Bay Area Green Business Program. The City shall continue to participate in the Bay Area Green Business Program that allows businesses to brand themselves as green by following sustainable practices.
Policy NRC-6.8	Waste Education. The City shall continue to provide programs to educate residents about waste reduction, proper waste disposal practices and strategies to help residents and businesses reduce waste.
Policy NRC-6.9	Organic Waste and Reduction. The City shall require all new development to comply with Chapter 6.45 Regulating Mandatory Organic Waste Disposal Reduction and (2) Section 2.20.150 to Chapter 2.20 Purchasing System, regarding procurement of recovered organic waste products to comply with Senate Bill 1383, California's Short-Lived Climate Pollutants Reduction Act (2016).
Goal NRC-7	Strengthen efforts to reduce greenhouse gas emissions from local sources to combat global climate change.
Policy NRC-7.1	City Trip Reduction. The City shall promote reduced idling, trip reduction, routing for efficiency, and the use of public transportation, carpooling, telecommuting, alternative scheduling, and alternate modes of transportation for operating City departments and City employees.
Policy NRC-7.2	City Vehicle Replacement. When replacing vehicles, the City shall purchase zero-emission vehicles, if a zero-emission vehicle is feasible based on use, for the City's fleet and use renewable fuel sources, such as bio-diesel for trucks and heavy equipment. If a zero-emission or renewable fuel vehicle is not feasible based on use, then the City shall consider a hybrid or fuel-efficient vehicle.
Policy NRC-7.3	Climate Action Plan Compliance. The City shall require all new development to comply with relevant Climate Action Plan strategies and measures.
Implementation	Programs
Program A	Creek Daylighting and Restoration Study. The City shall prepare a Creek Daylighting and Restoration Study that will identify specific actions to maintain and restore creeks and streams to a more natura state. Based on findings from the Study, the City shall prepare and submit recommendations to the City Council on priority actions to maintain and restore creeks and streams.
Program B	Urban Water Management Plan. The City shall review and update the Urban Water Management Plan every five years, as required by the Urban Water Management Planning Act.

ID #	Goals and Supportive Policies/Programs
Program C	Green Infrastructure Plan. The City shall implement and update (as needed) the Green Infrastructure Plan, adopted by City Council in September 2019, in accordance with Provision C.3.J of the Municipal Regional Permit that describes how the City will evaluate and shift toward green infrastructure over time.
Program D	Energy Conservation Ordinance. The City shall prepare an Energy Conservation Ordinance for residential and commercial development. The Ordinance shall include minimum energy efficiency and water efficiency standards at the time of building sale.
Program E	Streetlight Retrofit. The City shall continue to retrofit streetlights with light-emitting diode (LED) fixtures for energy efficiency and reduced maintenance.
Program F	City Building Audits and Reports. The City shall conduct an energy efficiency audit of City-owned buildings every five years to identify opportunities for efficiency improvements from both operations and equipment upgrades. The City shall prepare and submit a report to the City Council that summarizes the results of the audit and makes recommendations for improvements that will improve energy efficiency.
Program G	Energy Information and Outreach. The City shall continue its public information campaign to encourage energy conservation through energy conservation and renewable energy programs, including the PG&E Commercial Energy Efficiency Programs, the PACE Program, and the Small Residential Rooftop Solar Energy Systems Readiness Ordinance.
Program H	Recycling and Composting Information. The City shall continue to implement a public information campaign to inform all Millbrae residents and businesses about recycling and composting opportunities.
Program I	Integrated Waste Management Plan. The City shall continue to implement the state Integrated Waste Management Plan to meet the waste diversion requirements of all applicable laws.
Program J	Sustainable Purchasing Procedures. The City shall revise and thereafter periodically review Administrative Standard Procedures to strengthen sustainable purchasing procedures.
Program K	Maintain GHG Emissions Inventory. The City shall review and update the GHG emissions inventory for municipal and communitywide GHG emissions every five years.
Program L	 Climate Action Plan. The City shall review, and update Climate Action Plan that establishes strategies to reduce GHG emissions every five years. Climate Action Plan implementation shall include adopting the following ordinances: Latest CALGreen Code; Local amendments to implement "Reach Codes."
Source: Millbrae, C	ity of. 2022. Millbrae Draft 2040 General Plan Natural Resources Conservation Element.

Recreation, Arts, and Culture Element

The Recreation, Arts, and Culture Element, another component of the current General Plan, would also be updated. The purpose of the Recreation, Arts, and Culture Conservation Element is to provide for the continued enhancement of parks and recreation facilities to meet the recreational needs of existing and future residents as well as ensure the City meets its General Plan standard of three acres of developed parkland per 1,000 residents. The Element also provides goals and policies that strive to help preserve and protect Millbrae's historic structures, cultural sites, and urban forest as well as expand artistic, musical, and cultural programming in downtown Millbrae to support businesses, draw visitors, and invoke civic pride.

PROPOSED RECREATION, ARTS, AND CULTURE ELEMENT GOALS, POLICIES, AND PROGRAMS

Goals and supportive policies and programs of the proposed General Plan Recreation, Arts, and Culture Element are shown in Table 2-8.

ID #	Goals and Supportive Policies/Programs
Goal RAC-1	Provide high-quality, well-maintained, diversified, and accessible parks, open space, and recreational opportunities for all Millbrae residents.
Policy RAC-1.1	Parks, Recreation and Open Space Master Plan. The City shall develop and implement a parks, recreation, and open space master plan, consistent with the Parks and Facilities Inventory, Analysis and Recommendations Report. This will provide clear guidance and recommendations on how to meet the demands for future recreational, programming, environmental, and maintenance needs, as well as establish priorities for future park, recreation and open space renovations and facility improvements. The plan shall also evaluate demand for dog exercise and aquatic facilities and provide recommendations.
Policy RAC-1.2	Park Acquisition Plan. The City shall develop and implement a Park Acquisition Plan to provide a plan to acquire and/or improve existing undeveloped parkland in the City to maintain the General Plan standard of three acres of developed parkland per 1,000 residents.
Policy RAC-1.3	Diversified Recreational Activities. The City shall continue to encourage the provision of recreational activities for people, as well as their dogs, of all ability levels, consistent with the changing Millbrae demographics.
Policy RAC-1.4	New and Expanded Recreation Facilities. The City shall pursue opportunities through public and private means for developing new, modern recreational facilities and/or expanding and enhancing existing recreation facilities.
Policy RAC-1.5	Community Partnerships. The City shall continue to coordinate with local school districts in the joint use of school recreational facilities, as well as pursue partnerships with other agencies, community groups, and organizations.
Policy RAC-1.6	Impact Fees and Park Dedications Requirements for Residential Development Projects. The City shall continue to require new residential development to pay the City's Development Impact Fee for Park Acquisition and Facilities and Recreation Services. The purpose of the Park Acquisition and Facilities Fee is to acquire new parkland and to fund park facilities required to serve new development in the City to maintain the General Plan standard of three acres of developed parkland per 1,000 residents. The Recreation Services fee is to fund new development's share of planned new recreation facilities or improvements to existing recreation facilities. The City shall also continue to require all residential subdivisions dedicate land, pay a fee in lieu thereof, or both, at the option of the city, for park or recreational purposes according to the most recent adopted standards and impact fees.
Policy RAC-1.7	Park Facility Inspection and Maintenance. The City shall continue regular inspection and maintenance of park facilities to prolong the life of equipment, ensure safety and accessibility, and enhance the enjoyment of park users. When problems and deficiencies are identified, the City shall ensure that park and recreation facility maintenance is performed in a timely manner.
Policy RAC-1.8	New Park Facility Design . When designing new or renovations to existing park and recreation facilities or open space facilities, the City shall ensure the designs consider sustainable features, safety, stormwater facilities, lighting, ADA access, water sources, and that the City considers long-term maintenance needs, including needs for future staff and equipment. Open spaces and parks should incorporate sustainability measures, such as including native plant species, drought tolerant plants that require minimal irrigation, permeable paving, solar-powered lighting, and other similar features.
Policy RAC-1.9	Community Involvement. The City shall continue to encourage community organizations and private citizens to be involved in the planning, programming, maintenance, and enhancement of public parks and open spaces to supplement the City's ongoing park maintenance program.
Policy RAC-1.10	Spur Trail Property Improvements. The City shall complete and enhance the function of the Spur Trail Property as an open space and recreational amenity by improving additional landscaping, trails benches, ADA access, lighting, stormwater management facilities, water fountains, access for emergency response and maintenance, safety, and related features.

Table 2-8 Millbrae Recreation, Arts, and Culture Element Goals, Policies, and Programs

ID #	Goals and Supportive Policies/Programs		
Policy RAC-1.11	Recreation User Feedback. The City shall encourage feedback from recreation program participants facility users, and the general community through ongoing surveys that the City summarizes annually to improve service, programs, and activities.		
Goal RAC-2	Identify and preserve historic districts and structures to help define Millbrae's identity and character, enhance the built environment, and contribute to economic development.		
Policy RAC-2.1	Historic Resource Inventory. The City shall prepare and maintain an inventory of sites and structures of historical significance and evaluate the establishment of Historic Resource Districts.		
Policy RAC-2.2	New Development near Historic Structures. The City shall encourage new development to complement the character of nearby historic structures.		
Policy RAC-2.3	Historical and Archeological Resource Preservation. The City shall strive to prevent destruction of significant historical and archaeological resources through review as part of the CEQA process.		
Policy RAC-2.4	Historic Structure Preservation. The City shall strive to provision of incentives (such as the State Historical Building Code) for the preservation, restoration, and adaptive reuse of qualifying historic structures that are threatened with demolition or degradation.		
Policy RAC-2.5	Adaptive Reuse. The City shall maintain flexible land use standards to allow the adaptive reuse of historic buildings to preserve their original design and character, consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.		
Policy RAC-2.6	Historic Resource Protection. The City shall apply the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings where required to adequately protect and preserve historic resources.		
Goal RAC-3	Maintain, restore, and increase the existing trees and enhance the urban tree canopy into the future.		
Policy RAC-3.1	Grow the Urban Forest. The City shall update the City's Tree Inventory and Management Report and adopt an associated implementation plan to support opportunities to grow the urban forest by planting new trees, managing and caring for publicly-owned trees, and working to retain healthy trees.		
Policy RAC-3.2	Reduce Urban Forest Loss. The City shall support the identification and removal of aging or disease trees near the end of their lifespan to prevent potential hazards and should support succession plantings to reduce net loss to the urban forest.		
Policy RAC-3.3	New Funding Sources. The City shall explore new and innovative funding sources for tree planting and maintenance.		
Policy RAC-3.4	Tree City USA Designation . The City shall strive to maintain its status as a Tree City USA community by continuing to meet the program's requirements.		
Policy RAC-3.5	City Tree Regulations. The City shall update the Tree Protection and Urban Forestry Program Ordinance to include provisions for the protection of trees on private property		
Policy RAC-3.6	Street Trees. The City shall require new street trees as part of new development or other discretionary applications.		
Goal RAC-4	Identify and preserve sites and structures of cultural significance to strengthen City identity, encourage appreciation for history and culture, and contribute to economic vitality.		
Policy RAC-4.1	Native American Cultural Resource Protection. The City shall require the preservation and protection of Native American cultural resources, sacred sites, places, features, and objects, including historic or prehistoric ruins, burial grounds, cemeteries, and ceremonial sites, and shall ensure appropriate treatment of Native American and other human remains discovered during a project.		
Policy RAC-4.2	Tribal Consultation. The City shall continue to comply with applicable regulations and requirements by consulting with local California Native American tribes on potential disturbance, recovery, and preservation of tribal cultural resources.		

ID #	Goals and Supportive Policies/Programs	
Policy RAC-4.3	Cultural Sites Inventory. The City shall comply with State requirements to identify and maintain an inventory of sites and structures of cultural and architectural significance.	
Goal RAC-5	Support and enhance the availability and diversity of arts, music, and cultural amenities.	
Policy RAC-5.1	Support Festivals and Events. The City shall continue to support and attract festivals and events that benefit local businesses and strengthen the City image.	
Policy RAC-5.2	Performing Arts Facility. The City shall consider opportunities and feasibility of building a performing arts facility as a central location for cultural and social events and activities.	
Policy RAC-5.3	Private Recreation and Entertainment. The City shall support complementary efforts to provide well-rounded and balanced cultural and recreational facilities by attracting private-sector recreation and entertainment to help meet the needs of Millbrae residents and attract visitors.	
Policy RAC-5.4	Cultural and Ethnic Programs. The City shall continue to encourage cultural and ethnic programs and activities of local interest, including partnering with other organizations as appropriate	
Implementation	Programs	
Program A	 Parks and Facilities Master Plan. The City shall prepare and update every five years a Parks, Recreation and Open Space Master Plan to provide clear guidance and recommendations on how to meet the demands for future recreational, programming, environmental, and maintenance needs, as well as establish priorities for future park, recreation and open space renovations and facility improvements. The plan shall also evaluate demand for dog exercise and aquatic facilities and provide recommendations. The City will use this plan as a basis for establishing park funding sources and preparing the City's Capital Improvement Program 	
Program B	Recreation Program Responsiveness. Based upon a periodic review of recreation user needs, the City shall expand and diversify recreation program offerings to address new, unmet, and inclusive recreation needs to allow for individuals of all ability levels and backgrounds to participate.	
Program C	City/Schools Joint Use Agreement. The City shall continue to implement a joint use agreement with the Millbrae Elementary School District for the shared use of their recreational facilities.	
Program D	Park Development Impact Fees and Dedication Requirements. The City shall review and update the park development impact fees and dedication requirements for new development, consistent with state law.	
Program E	Pedestrian Improvements. The City shall install, or require private development projects to install, the following improvements where appropriate to pedestrian walkways: benches, lighting, new landscaping, trash/recycling cans, and other street furnishings.	
Program F	Park and Playfield Inspections. The City shall perform and document monthly inspections of park amenities and infrastructure and inspect playfields during weekly maintenance	
Program G	Park Acquisition Plan. The City shall develop and implement a Park Acquisition Plan to provide a plan to acquire and/or improve existing undeveloped parkland in the City to maintain the General Plan standard of three acres of improved parkland per 1,000 residents	
Program H	Recreation User Surveys. The City shall regularly survey recreation program participants, facility users, and the community to get feedback on the City's recreational facilities and programs. The City will summarize the results of the survey and make them publicly available.	
Program I	Historical Property Inventory. The City shall prepare an inventory of sites and structures of historical and archaeological significance consistent with the criteria outlined by the California Register of Historical Resources.	
Program J	Protection of Historic Resources. The City shall review and amend, as necessary, City regulatory procedures and codes to ensure adequate recognition and protection of historic resources, including but not limited to objective standards for historic structures and adjacent development.	
Program K	Tree Management Plan. The City shall prepare and maintain a Street Tree Management Plan that includes an inventory of existing trees on public property (data on age, location, species, and condition of the City's street trees), outlines a maintenance strategy, plans for the succession and growth of the urban canopy, and identifies funding strategies.	

ID #	Goals and Supportive Policies/Programs
Program L	City's Tree Inventory and Management Report. The City shall update the Tree Inventory and Management Report.
Program M	Updated Tree Protection and Urban Forestry Ordinance. The City shall update the Tree Protection and Urban Forestry Ordinance to include provisions for the protection of trees on private property.
Source: Millbrae,	City of. 2022. Millbrae Draft 2040 General Plan Recreation, Arts, and Culture Element.

Economic Development Element

The Economic Development Element, another component of the current General Plan, would also be updated. The purpose of the Economic Development Element is to grow the local base of highpaying jobs, cultivate a commercial business mix of uses that better serve resident needs and attract visitors, and retain and expand existing businesses. The Economic Development Element also provides goals and policies that focus on enhancing the leisure and hospitality sector in Millbrae, cultivating a vibrant downtown, and expanding Millbrae's regional economic influence.

PROPOSED ECONOMIC DEVELOPMENT ELEMENT GOALS, POLICIES, AND PROGRAMS

Goals and supportive policies and programs of the proposed General Plan Economic Development Element are shown in Table 2-9.

ID #	Goals and Supportive Policies/Programs	
Торіс		
Goal ED-1	Attract a diversity of businesses to support a robust and stable economy with a range of employment, shopping, and entertainment opportunities.	
Policy ED-1.1	Build on Millbrae's Assets. The City shall build on its strengths, including its central location, transportation infrastructure, excellent public schools, and quality of life to leverage economic growth and private investment in the city.	
Policy ED-1.2	Revenue Generation. The City shall encourage new development and establishment of new businesses that generate sales tax, property tax, and other revenues that sustain municipal services.	
Policy ED-1.3	City Real Property Assets. To the extent feasible, the City shall preserve the long-term value of its real property assets and seek to leverage any available assets through long-term leases, rental, or fees for use of the property rather than outright sale.	
Policy ED-1.4	Key Amenities. The City shall support amenities that attract businesses and employees to the city, including a more vibrant downtown; walkable neighborhoods; diverse dining and entertainment options; quality education and public safety; and more diverse housing choices.	
Policy ED-1.5	Job Creation. The City shall promote and support efforts to create quality jobs at all skill and wage levels for Millbrae residents.	
Policy ED-1.6	Biotechnology/Life Sciences Market. The City shall support new development that expands its position as a regional office and biotechnology/life sciences market, particularly projects near the Millbrae Station that leverage the city's accessibility and amenities.	
Policy ED-1.7	Key Sites Strategy. The City shall identify and actively encourage the development of key commercial, office, and light industrial sites.	
Policy ED-1.8	Local Hiring. The City shall promote local hiring, including youth employment and paid internships to help achieve a more positive jobs-housing balance and reduce regional commuting.	

Table 2-9 Millbrae Economic Development Element Goals, Policies, and Programs

ID #	Goals and Supportive Policies/Programs		
Goal ED-2	Grow the local economy by supporting local businesses to stay and expand in Millbrae		
Policy ED-2.1	Business-Friendly Climate. The City shall strive to improve the business climate for existing and future businesses by helping to support and foster strong relationships in the Millbrae business community.		
Policy ED-2.2	Public/Private Partnerships. The City shall support and encourage public/private partnerships with existing Millbrae businesses that align with the City's economic and community development goals.		
Policy ED-2.3	Buy Local. The City shall, to the extent possible, purchase goods and services from local businesses in Millbrae and encourage residents, businesses, schools, and community organizations to do the same.		
Policy ED-2.4	Sustainable Businesses. The City shall implement local strategies to support the diversification of businesses to focus on sustainable industries, as well as help businesses conserve resources such as water and energy, prevent pollution, and minimize waste and unsustainable business practices.		
Goal ED-3	Strive to support and expand Millbrae's leisure and hospitality sector.		
Policy ED-3.1	Hospitality Sector. The City shall encourage and support expansion of the hospitality sector in Millbrae, including hotels, restaurants, visitor services, and amenities such as conference and meeting facilities.		
Policy ED-3.2	High-Quality Hotels. The City shall support the establishment of high-quality hotels, including boutiqu hotels, that serve travelers to and from the San Francisco International Airport and business travelers.		
Goal ED-4	Be recognized as a desirable and business-friendly place to locate and conduct business on the Peninsula.		
Policy ED-4.1	Collaborative Business Relationships. The City shall encourage a collaborative and supportive relationship between the City and the business sector that emphasizes the success of doing business Millbrae.		
Policy ED-4.2	Streamline Development Approval and Permitting. The City shall encourage private-sector investment in the community by establishing mechanisms and new technologies to streamline approval of commercial development that is consistent with the General Plan and specific plans and the approval of permits for new businesses		
Policy ED-4.3	High Performing Business Infrastructure. The City shall encourage the construction and maintenance of the infrastructure necessary to attract and support businesses, including high-speed fiber optic and other high performing infrastructure.		
Policy ED-4.4	Digital Permit Process. The City shall ensure a timely, fair, and streamlined digital permit process that integrates multiple City departments into a single coordinated organization and improves the delivery of city services.		
Policy ED-4.5	Excellent Customer Service. The City shall provide excellent customer service to residents and businesses by creating a culture that listens, gains an understanding of customer concerns and goals, and proactively seeks solutions to address challenges.		
Policy ED-4.6	Permit Technology. The City shall optimize its review, case management, and permit procedures by using technology and other tools to improve the delivery of city services.		
Policy ED-4.7	Increasing Cultural and Language Diversity. The City shall respond to the increasing cultural and language diversity of Millbrae business owners, by including more inclusive and transparent outreach methods including providing multi-lingual resources and translation services to local businesses.		
Goal ED-5	Create a high-quality, pedestrian-oriented, mixed-use district along Broadway.		
Policy ED-5.1	Local Business Association Collaboration. The City shall collaborate with the Millbrae Chamber of Commerce, the Peninsula Chinese Business Association, and other business organizations on opportunities to grow and support Downtown businesses.		

ID #	Goals and Supportive Policies/Programs	
Policy ED-5.2	Community Anchors. The City shall encourage the development of a community anchors or anchor districts on Broadway between Meadow Glenn Avenue and Civic Center Lane, to actively boost pedestrian traffic from the Millbrae Station to the city's core along the Broadway and El Camino Real corridors. Types of anchors uses may include a single use, or a district of combined, synergistic uses such as a cultural venue, performing arts theater, amphitheater, boutique hotel, specialty retail, a large public plaza, or other public cultural amenity.	
Policy ED-5.3	Business Improvement District. The City shall encourage and support the formation of a business improvement district or other similar method/approach to evaluate, manage, and curate the uses in Downtown Millbrae. The business improvement district should have the responsibility and authority to ensure that the collective businesses and uses provide a variety of offerings and add economic vitality. In addition to overseeing business mix, the business improvement district should also address streetscape improvements, cleanliness of the public space, a coordinated marketing program, and special event programming.	
Policy ED-5.4	Business Mix. The City shall encourage a mix of commercial uses that includes small, locally-owned businesses as well as large national retailers. In particular, the City shall encourage quality locally, independently and minority-owned retailers, such as clothing stores, home furnishing stores, and diverse quality markets.	
Policy ED-5.5	Street Cleanliness. The City shall encourage efforts to improve and maintain the cleanliness of Downtown, including providing additional trash and recycling receptacles, and increasing trash and recycling pickup.	
Policy ED-5.6	Civic Landscaping Beautification. The City shall encourage the development of a Civic Beautification Program to lead efforts to enhance the planting, maintenance, and preservation, of quality landscaping along Broadway on public and privately-owned spaces, including tree plantings, flower beds, and flower baskets.	
Goal ED-6	Define and improve Millbrae's image to encourage economic investment, support businesses, and invoke civic pride	
Policy ED-6.1	Marketing and Branding. The City shall promote positive media coverage, branding, and marketing campaigns that build civic pride and create a favorable image of Millbrae.	
Policy ED-6.2	Streetscape Improvements. The City shall undertake, and require as part of all development projects, including tenant improvement projects, streetscape improvements and place-making efforts near the Millbrae Station, and along El Camino Real and Broadway, consistent with the Downtown and El Camino Real Specific Plan, to maximize the potential for increasing business activity.	
Policy ED-6.3	Arts, Entertainment, and Dining. The City shall promote investment and expansion of arts, entertainment, and dining in Millbrae, including special events, dining and night-life establishments, and arts venues.	
Policy ED-6.4	Culinary Tourism. The City shall strive to establish its reputation as a center for culinary tourism in the region.	
Policy ED-6.5	Gateway Features. The City shall enhance existing gateway features at the entrances to the city to boost city identity. Gateway features may include special architectural elements such as signage, enhanced lighting, distinctive public art, corner towers, and/or unique landscaping treatments.	
Implementatio	n Programs	
Program A	Business Attraction, Expansion, and Retention Program. The City shall collaborate with the Chamber of Commerce, the Peninsula Chinese Business Association, and other business organizations to support a business attraction, expansion, and retention program that will include the development and dissemination of promotional literature; research and publication of local market and trade information; surveys of local businesses to identify issues and opportunities; incentives for businesses to locate and/or stay in Millbrae; and tools to develop a business improvement district.	
Program B	Business Incentives for Local Hiring. The City shall prepare and promote a package of business incentives (e.g., reduced business license fees) to encourage Millbrae businesses to hire local residents	

ID #	Goals and Supportive Policies/Programs
Program C	City Staff Training in the Project Approval Process. The City shall conduct training with appropriate City staff regarding the process and their role in the project approval process, from submittal of an application to receiving field inspections.
Program D	Permit Processing Software. The City shall enhance its Development Services and business license permit processing software to streamline planning application reviews and the submission of electronic permit applications, reduce costs, and monitor processing time.
Program E	Customer Service Survey. The City shall prepare and administer a customer service survey to evaluate and identify opportunities to improve permit procedures and the customer service of the Community Development Department and Finance Department (business license permitting). The City will send the survey to applicants after permits for the project are finalized.
Program F	Economic Development Coordinator. The City shall hire an Economic Development Coordinator, pending available funds, to implement economic development initiatives to transform Downtown Millbrae into a high-quality, pedestrian-oriented, mixed-use district. This position shall focus on cultivating a mix of businesses, promoting collaboration with local business associations, and supporting the formation of a Downtown Business Improvement District.
Program G	Marketing and Branding Strategy. The City shall develop and maintain a marketing and branding strategy to promote doing business in Millbrae and maximize the effectiveness of the City's communication materials and website.
Program H	Culinary Tourism . The City shall work with the business community to develop and implement a program to generate culinary tourism to attract visitors based on local food choices and destination restaurants.
Program I	Enhancements to Gateways Signs to the City. The City shall identify opportunities to improve and maintain gateways into the City. This may include developer-funded improvements if a project is located at a Millbrae gateway, design, finance, and construct monument signs at the entrances to the city on each end of El Camino Real.
Source: Millbra	e, City of. 2022. Millbrae Draft 2040 General Plan Economic Development Element.

2.5.2 Specific Plan

Proposed Land Uses and Zoning

Land use and zoning changes are proposed for the Specific Plan area within the City of Millbrae. The Specific Plan focuses on potential for future transit-oriented, mixed-use development via provision of a mix of residential and commercial land uses. The Specific Plan also includes guiding principles, policies, land uses, streetscape design standards, and infrastructure upgrades for the downtown district and El Camino Real corridor portion of the City.

The proposed Zoning Code Amendments would be specific to the Specific Plan area and are necessary to maintain consistency across the plans and for plan implementation purposes. The zoning code amendments include:

- increased residential densities and permitted building heights;
- reduced parking requirements; and
- residential and commercial design standards.

The Specific Plan land use and urban design framework identifies four districts with distinctive character characterized by the mix of land uses, intensity of development and emphasis of ground floor programming. The following four districts are tied together by the Streetscape and Public Space Framework as well as the Circulation Framework:

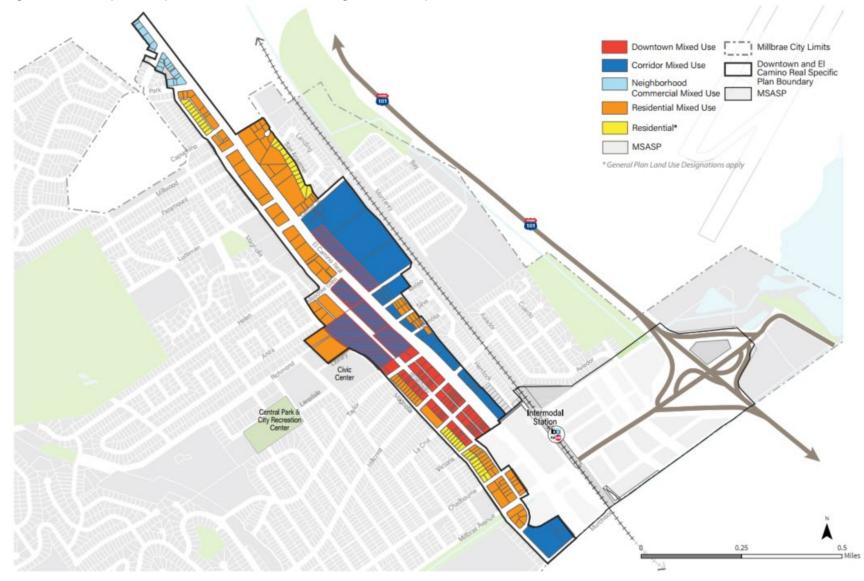
- 1. Downtown District
- 2. Community Anchor
- 3. North El Camino Real Neighborhood
- 4. Neighborhood Anchor

The Specific Plan land use designations and permitted height ranges are described in Table 2-10 and shown in Figure 2-8 and Figure 2-9.

Land Use Designation	Description	Range of Height	Residential Density	Intensity (Floor Area Ratio)
Downtown Mixed-use (DMU)	Maintain the existing economic base of the downtown while enhancing vibrancy of the downtown district by encouraging diversity of businesses and longer hours of activity.	Varies according to location	25-50 units/acre on parcels fronting Broadway; 70- 110 units/acre on parcels fronting El Camino Real	3.5
Corridor Mixed- use (CMU)	 Create opportunity for higher intensity development along El Camino Real corridor on parcels of varying sizes Take advantage of proximity to the intermodal stations and multi-modal complete street that El Camino Real is envisioned to be by allowing a mix of uses along the corridor 	Varies according to location	70-130 units/acre	3.5
Residential- focused Mixed- use (RFMU)	 Focuses on medium to high-density multi-family residential use to allow of a variety of multi-family residential typology such as apartments, stacked flats, senior housing, live-work units, co-living, etc. with high quality shared amenities Allows commercial uses on the ground floor to create opportunity for neighborhood scale and local businesses, and to provide space for community serving uses 	Varies according to location	60-80 units/acre	2.5
Neighborhood Commercial Mixed-use (NCMU)	Allows small offices for service-oriented businesses, along with retail, to strengthen its neighborhood serving function, within the Neighborhood Anchor district with residential use on upper floors	Varies according to location	80 units/acre	2.5
Residential	Unchanged. Complies with 2040 General Plan.	Varies according to General Plan and Zoning Code	Varies according to General Plan and Zoning Code	Varies according to General Plan and Zoning Code.

 Table 2-10
 Description of Proposed Specific Plan Land Use Designations

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan





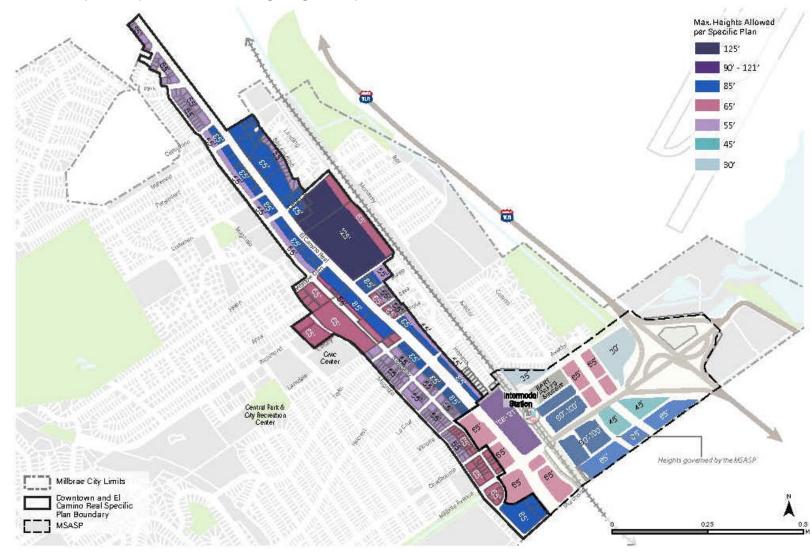


Figure 2-9 Proposed Specific Plan Building Heights Map

Building Heights

Residential Land Uses

The Specific Plan would provide the framework for development of up to 1,880 net new⁸ multifamily and accessory dwelling residential units, with the following composition:

Commercial Land Uses

The Specific Plan would provide the framework for development of up to 636,000 net new non-residential gross square feet (gsf) made up of the following:

- 200,000 gsf of hotel
- 105,000 gsf of office
- 225,000 gsf of general commercial
- 106,000 gsf of restaurant

Combined Land Uses

Specific Plan land uses would be permitted between 30 and 125 feet in height and with a floor area ratio range of 2.5 to 3.5. Density ranges would be between 25 and 130 dwelling units per acre.

Specific Plan Land Use and Housing Goals and Policies

Land use and housing goals and supportive policies of the proposed Specific Plan are shown in Table 2-11.

ID #	Goals and Supportive Policies/Programs	
Goal LU	To cultivate a pedestrian-oriented, mixed-use environment in the downtown and along El Camino Real that supports vibrant commercial activity, maximizes transit use, enhances quality of life, and is well-scaled with surrounding neighborhoods.	
Policy LU-1	Infill Development. The City shall support high-quality infill development that provides a rich mix of businesses, housing types, and community-serving uses and encourage public transit, walking, and biking.	
Policy LU-2	Mixed-use Development. The City shall encourage vertical mixed-use development with active ground floor uses, and residential and office uses on the upper floors.	
Policy LU-3	El Camino Real. The City shall prioritize higher density and intensity development along El Camino Real and establish a multimodal complete street, lined with a diverse mix of uses that are context sensitive and includes an attractive streetscape design that creates an inviting pedestrian environment and a positive city image.	
Policy LU-4	Downtown. The City shall encourage a mix of small- scale, infill development with community gathering places that serves residents and attracts more pedestrian traffic, while enhancing the charming character of downtown.	
Policy LU-5	Business Mix. The City shall consider opportunities to incorporate a mix of businesses that includes locally owned businesses as well as larger, anchor retailers.	
Policy LU-6	Community Anchor. The City shall establish a "community anchor" on the northern end of downtown to draw pedestrian traffic from the Intermodal Station along El Camino Real and through downtown. The community anchor will support large format development such as specialty retail, hospitality, entertainment venues, meeting facilities, and outdoor public space such as a park or plaza.	

Table 2-11 Specific Plan Land Use and Housing Goals and Policies

⁸ Net new means the change from City of Millbrae existing permitted development to City of Millbrae proposed permitted development related to implementation of the proposed plans; this EIR analyzes the net change in terms of potential physical environmental impacts.

ID #	Goals and Supportive Policies/Programs		
Policy LU-7	Neighborhood Anchor. The City shall establish a neighborhood anchor on the northern end of El Camino Real to provide a compact concentration of neighborhood-serving uses, including retail, a grocery store, cafes, restaurants, entertainment, and small offices. The neighborhood anchor should include small public spaces, such as courtyards or parklets.		
Policy LU-8	Land Assemblage. The City shall encourage property owners to collaborate and assemble their parcels facilitate an integrated development project that advances the community's goals for downtown and E Camino Real to be a destination for residents and visitors.		
Policy LU-9	Development Impact Fee Program. The public improvements needed in the Specific Plan Area, which include mobility improvements, water distribution system capacity, and sewer collection system capacity shall be funded by the City's development impact fee program, and other supplemental funding sources noted in the accompanying Financing Plan.		
Policy LU- 10	Active Alley. The City shall improve the alley between Broadway and El Camino Real from Taylor Boulevard to Victoria Avenue to make it a visually attractive and vibrant space for people and		
	businesses. Improvements may include an alley name, wayfinding signage, pavement improvements, landscaping, and public art. The City shall consider reviewing its development standards to allow for businesses and housing to front on the alley and consider implementing an Innovative Alley Toolkit for property owners, organizations, and businesses to use.		
Policy LU- 11	Office Space Needs. The City shall encourage the renovation and upgrading of existing office space and promote development of new smaller office spaces along El Camino Real to support local jobs and increase the tax base.		
Policy LU- 12	Land Use Safety Compatibility. The City shall consider all applicable Federal statutes (including 49 U.S.C. 47107), Federal regulations (including 14 Code of Federal Regulations 77 et seq.), the Federal		
	Aviation Administration (FAA) Airport Compliance Manual, FAA Advisory Circulars, other forms of written guidance, and State law with respect to criteria related to land use safety and airspace protection when evaluating development applications within the Airport Influence Area of the San Francisco International Airport and Mills-Peninsula Medical Center helipad.		
Policy LU- 13	Airport Safety. The City shall regulate land uses and building height within the Airport Influence Area of the San Francisco International Airport in compliance with FAR Part 77 height restriction standards, in accordance with Airport Land Use Commission guidelines to assure safety of aircraft, persons, and property near the Airport.		
Policy LU- 14	Federal Aviation Administration Requirements for Development. The City shall require development projects within the Airport Influence Area designated in the Airport Land Use Compatibility Plan of the San Francisco International Airport to comply with all applicable Federal statutes (including 49 U.S.C. 47107), Federal regulations (including 14 Code of Federal Regulations 77 et seq.), the FAA's Airport Compliance Manual, FAA Advisory Circulars, other forms of written guidance, and State law with respect to criteria related to land use safety and airspace protection. Cranes and other equipment used to construct the building are also required to comply with all FAA federal statutes.		
Policy LU- 15	Airport Land Use Compatibility Plan and Land Use Development Consistency. The City shall ensure th all future land use actions and/or associated development conforms to the relevant height, aircraft noi and safety policies and compatibility criteria contained in the most recently adopted version of the Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.		
Goal H	To support a wide range of affordable and accessible housing near transit.		
Policy H-1	Affordable Housing Requirement for Residential Development Projects. The City shall require new residential development to comply with Millbrae Municipal Code Article XXXIII. Affordable Housing On-Site and In-Lieu Fee Requirements and associated City Council Resolutions. These regulations establish requirements for the provision of inclusionary affordable housing designated as deed restricted for very low-, low-, and moderate-income households in conjunction with new development projects. They also establish requirements for affordable housing in-lieu fees for certain projects.		
Policy H-2	Affordable Housing Commercial Linkage Impact Fee. The City shall require new commercial development to comply with Millbrae Municipal Code Article XXXIV. Affordable Housing Commercial Linkage Impact Fee and associated City Council Resolutions. These regulations establish requirements for an affordable housing commercial linkage impact fee applicable to new commercial development		

ID #	Goals and Supportive Policies/Programs
	projects to address the impacts of their projects on the demand for affordable housing by contributing to the supply of housing for households with extremely low, very low, low, and moderate incomes.
Policy H-3	Relocation Assistance. The City shall encourage developers to provide relocation assistance to residents who are displaced by the redevelopment of their residence, including active support finding a new place of residence and the right of first return in the new development.

Circulation, Access, and Parking

The Specific Plan Public Realm and Streetscape Framework is shown in Figure 2-10, and the Specific Plan Public Circulation Framework is shown in Figure 2-11.

Vehicle

As part of the Specific Plan, road design improvements would include sidewalk widening projects, bulb-outs for safer pedestrian crossings, median refuge installations, and increased landscaping along roadways. The following describes specific proposed improvements for roadways and parking within the Specific Plan area:

FRONTAGE ROADS

- Entrances and exists for frontage roads along the west side of El Camino Real would be reconfigured to allow for direct access to and from El Camino Real.
- Existing frontage road driveways would be replaced with large curb extensions, street trees, landscaping, or other pedestrian amenities.
- Sidewalk widening.

NON-FRONTAGE ROADS (PHASED)

Tasks within this project could be divided into two phases and are labeled as either Phase 1 or Phase 2 to indicate during which phase the tasks would occur.

- Reduced left turn lane widths from 11-feet to 10-feet (Phase 1).
- On-street parking would be eliminated on both sides of the street (Phase 1).
- A five-foot-wide bike lane with a 3-foot buffer would be added in both directions (Phase 1).
- The median would be extended to provide a pedestrian refuge (Phase 1).
- A travel lane in each direction would be removed (Phase 2).
- Sidewalks would be widened from 8-feet to 10-feet (Phase 2).
- Parking would be reintroduced to both sides of the street (Phase 2).
- Bike lanes would be parking protected with 6-foot-wide lanes and 4-foot buffers (Phase 2).
- Street trees would be planted at approximately 30-foot spacing (Phase 2).
- Bus boarding platforms would be aligned with parking/bike buffer with 13-foot width (Phase 2).
- Broadway Existing angled parking would be reconfigured to parallel parking.
- Sidewalks would be widened.
- Landscape buffers would be added between pedestrian sidewalks and the street.
- High visibility crosswalks and raised crossings would be added.

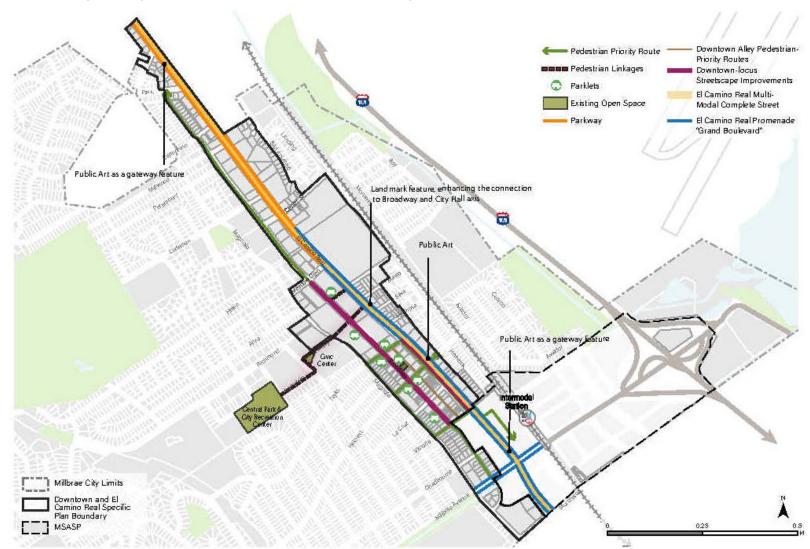


Figure 2-10 Proposed Specific Plan Public Realm and Streetscape Framework

Open Space and Public Realm Diagram

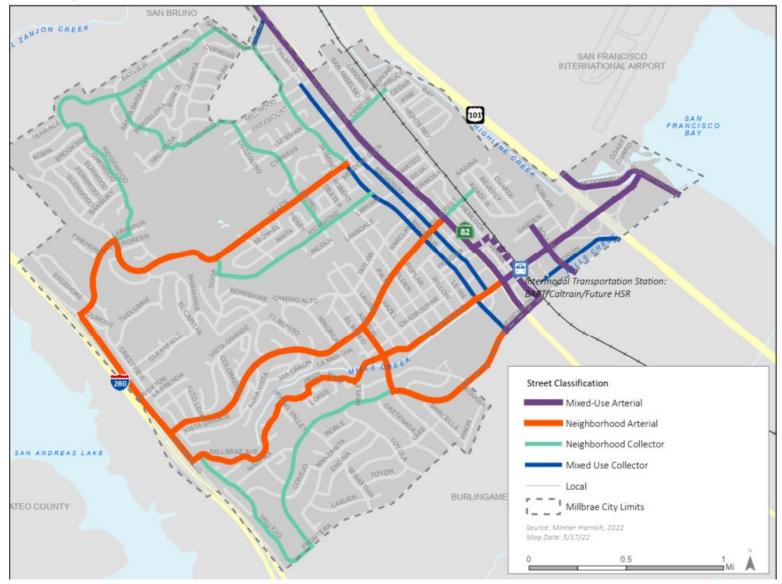


Figure 2-11 Proposed Circulation Framework

BROADWAY

- Existing angled parking would be reconfigured to parallel parking.
- Sidewalks would be widened.
- Landscape buffers would be added between pedestrian sidewalks and the street.
- High visibility crosswalks and raised crossing would be added.

PARKING

Within the Specific Plan area, retail uses would be required to provide one vehicle parking space per 300 square feet; supermarkets would be required to provide one space per each 200 square feet; restaurants would be required to provide one parking space for each 2.5 seats; commercial office uses would be required to provide one space per 300 square feet; hotel uses would be required to provide one space per 300 square feet; hotel uses would be required to provide one space per uses would be required to provide one space per and multi-family residential uses would be required to provide one space per unit. New development parking requirements would also include a requirement to provide electric vehicle parking.

Transit

Transit improvements within the Specific Plan area would include in-lane bus stops and transit islands. In addition, transit amenities such as shelters, and benches would be improved upon to increase comfort for transit riders along El Camino Real.

Bicycle

Bicycle improvements within the Specific Plan area would include the widening of bikeways, installation of bikeways, and bike lane protection measures such as parking protected bike lanes. Active transportation improvements are included in the separate Millbrae Active Transportation Plan. Bicycle and scooter parking would be provided by all new development.

Pedestrian

The Specific Plan area roadways would undergo improvements related to pavement materials, furnishings, lighting, planting, wayfinding, and public art. Sidewalks would be designed to have three different zones: Frontage Zone, Pedestrian Zone, Public Amenity Zone. The Frontage Zone would accommodate outdoor seating, signage, and building entrance elements; the Pedestrian Zone would be dedicated to pedestrians and, where possible, should consist of 50 percent of the overall sidewalk area or have a minimum of 6 feet wide; the Public Amenity Zone would accommodate street plantings, lighting, furnishings, wayfinding signage, parking meter, bike stands, or curb-side pick-up/drop-off activities. Alleys within the Specific Plan area would be limited to service vehicles only and would be improved upon with additional lighting, durable paving materials, landscaping, and murals/color for pedestrian safety and comfort. Vehicle loading docks and service access would be located on the back of buildings and would not be located on El Camino Real or Broadway.

Specific Plan Circulation and Parking Goals and Policies

Circulation and parking goals and supportive policies of the proposed Specific Plan are shown in Table 2-12.

ID #	Goals and Supportive Policies/Programs				
Goal CP	To provide a safe and well-connected circulation network that promotes transportation mode choices, reduces vehicle traffic, and promotes healthy lifestyles.				
Policy CP-1	Innovative Parking Solutions. The City shall encourage new development to use innovative parking solutions to decrease visibility of parking from El Camino Real and lower development costs while providing adequate parking. These parking solutions may include reduced parking ratio requirements for key land uses accessible to transit, mechanical and automated parking or shared parking, and/or u of car elevator instead of ramps.				
Policy CP-2	Parallel Parking on Broadway. The City shall consider implementing parallel parking on Broadway (Consistent with the recommendations of the Downtown and El Camino Real Streetscape Plan) to allow for increased sidewalk widths, subject to further study of parking provisions for adjacent businesses.				
Policy CP-3	New Parking Facilities. The City shall encourage structured, underground, or tuck-under parking in new development, and discourage new or expanded surface parking lots. Encourage shared parking facilities especially in downtown.				
Policy CP-4	Parking In-Lieu Fee. The City shall establish a new Parking In-Lieu Fee for the Specific Plan area, and those funds generated for enhancement of parking.				
Policy CP-5	Parking Management Strategy. The City shall prepare and implement a parking management strategy for the Priority Development Area (PDA) that considers the use of all available tools, including parking enforcement, to address parking issues within the PDA plan areas.				
Policy CP-6	Reduce Parking Encroachment. The City shall continue to explore new methods to prevent or reduce parking encroachment from commercial areas into existing neighborhoods (Example, through parking restrictions, resident permits etc.).				
Policy CP-7	Downtown Parking Supply. The City shall consider active parking management to expand downtown parking supply, including parking reservation systems, parking meters in public parking lots, wayfinding digital real-time parking availability signs, priced parking, and potential parking structures and partnerships with new developments to provide parking available to the public.				
Policy CP-8	Smart Parking Meters. The City shall implement smart parking meters in the Specific Plan area that accept multiple forms of payment (credit cards and coins) and is accessible by a mobile app that allow users to locate available spaces and receive alerts when the meter is about to expire.				
Policy CP-9	Accessibility for Persons with Disabilities. The City shall create an accessible circulation network, consistent with the Americans with Disabilities Act (ADA), that provides safe and accessible paths of travel for persons with disabilities between the Intermodal Station, El Camino Real, and downtown.				
Policy CP-10	Wayfinding Signage. The City shall provide wayfinding signage, consistent with the Streetscape Plan, along El Camino Real and in downtown, particularly at major intersections.				
Policy CP-11	Pedestrian Crossings. The City shall work with Caltrans to implement the Streetscape plan and improve pedestrian crossings on El Camino Real to increase the predictability and visibility of pedestrians by providing complete sidewalk coverage, signal controlled crosswalks, minimizing the intersection footprint, reducing pedestrian crossing distances, shortening traffic signal cycle lengths, and using high-visibility treatments. These improvements shall focus on the intersection crossings along El Camino Real, and at Millbrae Avenue and the U.S. Highway 101 onramps.				
Policy CP-12	Bicycle Lanes on El Camino Real. The City shall work with Caltrans to add separated bicycle lanes on El Camino Real to increase cyclist safety, enhance connectivity, reduce automobile reliance, and encourage active lifestyle choices.				
Policy CP-13	Bicycle Route Alternatives to El Camino Real. The City shall add and maintain bicycle routes along Magnolia Avenue and Hemlock Avenue to provide lower volume and lower speed route alternatives to El Camino Real.				
Policy CP-14	Bicycle Parking. The City shall require new development to provide safe and secure bicycle parking facilities, such as bike lockers, bike storage rooms at ground level, and bike racks that allow for proper two-point locking.				

Table 2-12 Specific Plan Circulation and Parking Goals and Policies

ID #	Goals and Supportive Policies/Programs
Policy CP-15	Bus Stops. The City shall work with partner agencies to encourage improvements to bus stops and addition of amenities along El Camino Real (e.g., shelters, trash receptacles) that encourage transit use, contribute to sense of place, and improve the public realm.
Policy CP-16	Micro-mobility. The City shall provide micro-mobility options such as bike and scooter shares, and design the streetscape and public plazas to accommodate docking stations, bike parking, etc.
Policy CP-17	Widened Sidewalk and Multi-use Curb Lane on El Camino Real. The City shall incorporate elements along El Camino Real that provide multi-use curb lanes which accommodates a variety of curb uses such as on-street parking, ride-share pick-up/drop-off, loading, parklets, micro-mobility docking stations, etc.
Policy CP-18	Transportation Demand Management. Transportation Demand Management Plan Area employers, property managers, and housing providers shall prepare Transportation Demand Management (TDM) Plans that include measures to increase the number of residents and employees walking, biking, using transit, or ridesharing (using carpools and vanpools) as commute modes and to reduce vehicle congestion. Where future projects have the potential to impact facilities under the Congestion Management Plan, the TDM Plan shall meet the current City/ County Association of Governments of San Mateo County (C/CAG) requirements to reduce the number of trips on the Congestion Management Plan roadway network and be approved by both the City and C/CAG. TDM Plans shall achieve at least a 20 percent reduction in trip generation, and the Plan shall include provisions for monitoring, enforcement, and assessment of financial penalties for non-compliance.

Source: Millbrae, City of. 2022. Millbrae Downtown and El Camino Real Specific Plan.

Design, Lighting, and Signage

Residential

The design of residential uses of the Specific Plan area would be regulated through Floor Area Ratio (FAR) and residential density restrictions. The density of multi-family developments would be 900 square feet, consistent with the current Bay Area market conditions. Multi-family developments and mixed-use developments would have varying height restrictions dependent on the type of land use, as shown in the discussion of *Residential Land Uses* and as such, would also have differing setbacks and design guidelines. Residences in mixed-use developments would be designed such that varying setbacks would be provided between buildings to ensure privacy is ensured for all residents and shadows would be minimized on adjacent lots and buildings. Massing of larger buildings would be broken up through modulation of form and façade articulation so as to break continuous building edges. The design of residential buildings on corner lots would also be required to include architectural elements that emphasize building corners. Ground floors of residential buildings would be elevated up to 4 feet from the sidewalk and building entrances and associated landscaping would be designed to provide an active frontage along sidewalks and streets.

Non-Residential

Non-residential design would be regulated through FAR residential densities, and building height restrictions. As the land uses within the Specific Plan area would be mixed-use and allow for residential development, residential design guidelines would also apply to non-residential development. Heights of mixed-use buildings would be regulated through development standards but would also be regulated through street widths restrictions, to the extent feasible. Where possible, street width would be twice as wide as the heights of the buildings. Buildings that are 40 feet in height would be setback so as to decrease massing. Where that ratio is unachievable and buildings would exceed 40 feet in height, buildings would have setbacks and streetscape elements

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such as trees, street lighting, vertical signage would be used to define streets. As heights of buildings in the Specific Plan area would differ from existing conditions, transitions to single family neighborhoods and from El Camino Real and Broadway would decrease building massing. Massing of larger buildings would be broken up through modulation of form and façade articulation so as to break continuous building edges. The design of non-residential buildings on corner lots would also be required to include architectural elements that emphasize building corners. Ground floor uses would be required to be at sidewalk level of no more than 2 feet above sidewalk level. Furthermore, each ground floor uses of new development would include active ground floor uses. Along El Camino Real, ground floor uses would have an active frontage for a minimum of 50 percent of the length of the building and be required to have a minimum of 50 percent of the linear ground floor wall for a minimum of 75 percent of the linear ground floor wall. Where shopfronts are proposed along Broadway, primary entrances would be on Broadway.

Building signage for non-residential uses would be designed to complement building design in the choice of materials, colors, scale, lettering, and lighting. Visual interest would also be created through lighting of non-residential uses.

Roadways

The roadway network within the Specific Plan area consists of regional connector streets, commercial corridors, and local roadways. Improvements to each of these roadway types would include accommodations for vehicles and pedestrians, streetscape enhancements, walking and biking improvements, roadway maintenance and speed management. Public art and streetscape elements would serve to enhance local roadways.

Specific Plan Urban Design and Image Goals and Policies

Urban design and image goals and supportive policies of the proposed Specific Plan are shown in Table 2-13.

ID #	Goals and Supportive Policies/Programs
Goal UD	Create districts with a distinct character that is well designed and creates a sense of place while being sensitive to surroundings.
Policy UD-1	El Camino Real Experience. The City shall support opportunities that transform El Camino Real into a livable corridor with enhanced streetscape design, street planting and buildings with high-quality architectural design, well-articulated facades and high-quality materials.
Policy UD-2	Downtown Experience. The City shall enhance the downtown experience for residents and visitors by building on downtown's fine-grain fabric and quaint character, enhance the streetscape design, incorporate wayfinding, offer an outdoor dining experience, and incorporate social gathering spaces.
Policy UD-3	Building Orientation. Require projects to orient entrances and frontages toward major roads, intersections, and public spaces.
Policy UD-4	Active Use Frontage. The City shall require buildings along Broadway and El Camino Real to maximize street-activating retail and non-retail ground floor uses to create a vibrant and active street environment.
Policy UD-5	Integrate New Development. The City shall require new development to be integrated within the existing fabric of the surrounding neighborhoods to contribute to a cohesive community by including well-scaled buildings, compatible programming, pedestrian connections and public spaces.
Policy UD-6	Transition in Scale. The City shall ensure new development has an appropriate transition in scale between high density, mixed-use development along El Camino Real and adjacent neighborhoods by

ID #	Goals and Supportive Policies/Programs	
	establish objective development standards for building setbacks, upper floor step-backs, building massing and articulation	
Policy UD-7	New Development Near Historic Structures The City shall encourage new development to complement the character of nearby historic structures.	
Goal CIP	To enhance the sense of place in downtown and on El Camino Real to attract economic investment, improve quality of life, and promote the city as a desirable place to live.	
Policy CIP-1	Street Cleanliness. The City shall improve and maintain the cleanliness of downtown, including but not limited to, controlling litter, providing additional trash receptacles, and increasing frequency of waste pickup.	
Policy CIP-2	Consistent Branding Features. The City shall support the development of consistent branding features in downtown and along El Camino Real that define Millbrae's image.	
Policy CIP-3	Festivals and Events. The City shall support festivals and events in downtown that draw residents, attract visitors, benefit local businesses, and evoke civic pride.	
Source: Millbrae, City of. 2022. Millbrae Downtown and El Camino Real Specific Plan.		

Landscaping and Open Space

Landscaping

Landscaping would include the addition of streetscape trees along El Camino Real and Broadway. Additionally, landscaping would include the addition of small public spaces such as courtyards and parklets. As described in the Specific Plan Streetscape Plan Appendix, the Specific Plan area would undergo improvements that would include green infrastructure opportunities along streets and within new community open spaces. Landscaping would also be used to enhance building frontages and sidewalks. Landscape design and enhancements would comply with the recommendations of the Streetscape Plan.

Open Space

Open Spaces within the Specific Plan area would be limited to the installation of plazas, parklets, private open spaces, and paseos. Open spaces, both public and private, would be accessible from public streets with clear signage. The design of these spaces would be such that solar access would be available for at least 6 hours a day and screened from winds where needed.

Specific Plan Open Space and Public Realm Goals and Policies

Open space and public realm goals and supportive policies of the proposed Specific Plan are shown in Table 2-14.

	specific fran Open space and robic kealin Goals and rolicles	
ID #	Goals and Supportive Policies/Programs	
Goal OS	Establish a pedestrian-oriented public realm that includes a network of public open spaces that are connected by safe pedestrian paths.	
Policy OS-1	Pedestrian-Oriented Public Realm. The City shall enhance the public realm to promote an engaging, safe, and comfortable pedestrian experience. Improvements should include the addition of plazas, parklets, outdoor seating, consistent street planting and other landscape elements, wide sidewalks, sidewalk furniture, and public art.	
Policy OS-2	Network of Public Open Spaces. The City shall provide a network of public open spaces, including outdoor plazas, parks, and parklets, that is connected by pedestrian walkways and paths.	

Table 2-14 Specific Plan Open Space and Public Realm Goals and Policies

ID #	Goals and Supportive Policies/Programs	
Policy OS-3	Sustainable Open Space and Parks. The City shall require open spaces and parks to incorporate sustainability measures, such as including native plant species and drought tolerant plants that require minimal irrigation, permeable paving, solar-powered lighting, and other similar features.	
Policy OS-4	Park Acquisition and Facilities Fee for Residential Development Projects. The City shall require new residential developments to pay the City's Development Impact Fee for Park Acquisition and Facilities and Recreation Services. The purpose of the Park Acquisition and Facilities Fee is to acquire new parkland and to fund park facilities required to serve new development in the City to maintain the General Plan standard of three (3) acres of parks per 1,000 residents. The Recreation Services fee is to fund new development's share of planned new recreation facilities or improvements to existing recreation facilities.	
Policy OS-5	Public Art. The City shall incorporate more public art downtown and at major gateways to the City on El Camino Real, including sculptures and murals. Provide opportunities for "art for the public" that is fitting and relevant to the context. Establish a new public art ordinance and in-lieu fee to facilitate art in the Specific Plan area.	
Policy OS-6	Park Dedication and/or Fees for Residential Subdivisions. The City shall require all residential subdivisions to dedicate land, pay a fee in lieu thereof, or both, at the option of the city, for park or recreational purposes at the time and according to the standards and impact fees	
Source: Millbrae, City of. 2022. Millbrae Downtown and El Camino Real Specific Plan.		

Infrastructure Improvements

The following description of proposed Specific Plan infrastructure improvements is based on an Infrastructure Report that is Appendix B to the Downtown and El Camino Real Specific Plan.⁹

Domestic Water

There are hydraulic deficiencies within the Specific Plan area. To address high velocities in smaller diameter pipelines during fire flow conditions, it is recommended that existing pipelines within the Specific Plan Area be replaced with larger diameter pipelines. Specific recommended projects include the installation of a new 12-inch diameter intertie to increase connectivity between the Victoria Turnout and El Camino Real; replacement of approximately 1,500 linear feet of existing 6-inch diameter pipelines with new 12-inch diameter pipeline; replacement of approximately 8,850 linear feet of existing 6-inch diameter pipelines with new 12-inch diameter pipelines (5,250 linear feet located in El Camino Real); replacement of approximately 500 linear feet of existing 8-inch diameter pipelines; and the replacement of approximately 1,800 linear feet of existing 8-inch diameter pipelines with new 12-inch diameter pipelines (250 linear feet of existing 8-inch diameter pipelines with new 12-inch diameter pipelines (250 linear feet of existing 8-inch diameter pipelines with new 12-inch diameter pipelines (250 linear feet of existing 8-inch diameter pipelines with new 12-inch diameter pipelines (250 linear feet of existing 8-inch diameter pipelines with new 12-inch diameter pipelines (250 linear feet of existing 8-inch diameter pipelines with new 12-inch diameter pipelines (250 linear feet of existing 8-inch diameter pipelines with new 12-inch diameter pipelines (250 linear feet of existing 8-inch diameter pipelines with new 12-inch diameter pipelines (250 linear feet located in El Camino Real).

Sanitary Sewer

The addition of sanitary sewer flows within the Specific Plan area would require improvements to the sewer collection system beyond those identified in the Capital Improvement Program for the Wet Water Alternatives Analysis and the MSASP evaluation. It is the City's policy that capacity restrictions be mitigated with Rainfall Derived Infiltration and Inflow (RDII) reductions rather than infrastructure capacity increases where feasible and economical. An evaluation of RDII reductions and sewer capacity improvements determined that capacity improvements along El Camino Real and adjacent to the Highline Canal in concert with RDII reductions in the Broadway and Madrone

⁹ Millbrae, City of. 2022. Downtown and El Camino Real Specific Plan: Appendix B, *Infrastructure Report*, https://www.ci.millbrae.ca.us/home/showpublisheddocument/26300/637909858885600000 (accessed July 2022).

sub-basins would be most cost-effective. Improvements include upsizing pipelines for gravity main capacity improvements. In addition, it would be recommended to add two sub-basins, one in the Broadway Basin and one in the Madrone Basin to offset the Specific Plan area flows. If RDII reduction requirements are not met, then there would be no capacity increase or wet weather storage equalization required at the Water Pollution Control Plant (WPCP). If the RDII reduction requirements are not implemented, additional storage would be required to equalize the projected wet weather flow such that it would not exceed the combined treatment/existing equalization capacity of the WPCP.

Stormwater Drainage

The Specific Plan would be required to meet stormwater drainage requirements enforced by the City of Millbrae; Water Quality, Hydromodification Management, Green Infrastructure, Trash Control, and City Standards. Many of the parcels within the Specific Plan area would qualify to have reduced Low Impact Development (LID) treatment requirements based on smart growth, high density, or transit-oriented development criteria. This reduction in LID would be granted at the City's discretion and could be rejected in favor of full LID compliance. Consistent with the San Mateo Countywide Water Pollution Prevention Program, it is recommended that the City require full or expanded LID treatment for all developments. In addition, it would be recommended that the City prepare Sea Level Rise Standards that would require developers to design for increasing Bay water levels including the payment into regional mitigation strategies such as floodwalls and sea walls.

Solid Waste, Compost, and Recycling Collection

The Specific Plan does not include new solid waste, compost, or recycling collection. Existing services and facilities would provide solid waste, compost, and recycling collection within the Specific Plan area.

Power and Telecommunications

The Specific Plan does not include new power or telecommunications facilities. Existing services and facilities would provide power and telecommunication services within the Specific Plan area.

Public Services Improvements

The Specific Plan does not include new public services amenities. Existing stations, schools, parks, and facilities would provide public services within the Specific Plan area.

Construction

Given the programmatic nature of the 2040 General Plan and Specific Plan, specific projects details and locations that could result in the future within these land use areas are unknown at this time. All future projects would require project-level environmental review analysis (i.e., categorical exemption, initial study, and/or technical studies) with regard to construction impacts and location details (except with regard to potentially exempt projects, including affordable housing projects).

2.6 Required Actions and Approvals

Implementation of the proposed plans would require the following approvals:

2.6.1 2040 General Plan

- EIR Certification: City Council
- Adoption of 2040 General Plan: City Council
- Approval of Millbrae Municipal Code Title 10 (Planning and Zoning) Text Amendments: City Council
- Approval of Zoning Map Amendment (pursuant to Millbrae Municipal Code Title 10 Planning and Zoning Article XXVIII. Amendments): City Council

2.6.2 Specific Plan

- EIR Certification: City Council
- Adoption of Specific Plan: City Council
- Approval of Millbrae Municipal Code Title 10 (Planning and Zoning) Text Amendments: City Council
- Approval of Zoning Map Amendment (pursuant to Millbrae Municipal Code Title 10 Planning and Zoning Article XXVIII. Amendments): City Council

3 Environmental Impact Analysis

This chapter sets forth the physical and regulatory environmental setting and addresses the environmental impacts of the General Plan Update and the Specific Plan (proposed plans) with respect to 13 environmental resource areas. The discussions of the environmental setting in each subsequent section of this Environmental Impact Report (EIR) describe the present physical conditions, or baseline conditions, in the General Plan area and the Specific Plan area (plan areas). The baseline used for the analysis of environmental impacts under the California Environmental Quality Act (CEQA) reflects the conditions present at the time the Notice of Preparation (NOP) for this EIR was published. The potential impacts of the proposed plans are compared against the existing baseline conditions for each environmental resource.

Environmental Topics Addressed in this EIR

The proposed plans are analyzed in this EIR from the perspective of the following 13 environmental topics:

- Aesthetics
- Air Quality
- Biological, Agriculture, and Forestry Resources
- Cultural and Tribal Cultural Resources
- Geology/Soils and Mineral Resources
- Greenhouse Gas Emissions and Energy

- Hazards, Hazardous Materials, and Wildfire
- Hydrology and Water Quality
- Land Use/Planning and Population/Housing
- Noise
- Public Services and Recreation
- Transportation
- Utilities and Service Systems

Format of the Environmental Analysis

Each environmental resource area is analyzed in individual sections that include the subsections summarized below.

Introduction

This subsection summarizes what will be discussed in the respective environmental topic section, states what informational documents are used as the basis for the section, and indicates what related comments, if any, were received during the EIR public scoping period.

Environmental Setting

This subsection describes the existing, baseline physical conditions of the plan area and surroundings (e.g., existing land uses, transportation conditions, noise environment) with respect to each resource topic at the time the NOP was issued. Conditions are described in sufficient detail and breadth to allow a general understanding of the environmental impacts associated with implementation of the proposed plans.

Regulatory Framework

This subsection describes the relevant federal, State, regional, and local regulatory requirements that are directly applicable to the environmental topic being analyzed.

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Impacts and Mitigation Measures

This subsection evaluates the potential for the implementation of the proposed plans to result in direct and indirect adverse impacts on the existing physical environment, with consideration of both construction and operation impacts. The significance criteria questions for environmental impacts are listed at the beginning of this subsection, followed by the discussion of the approach to the analysis and specific thresholds of significance that have been applied to evaluate the impacts of the proposed plans.

Indirect impacts are discussed only for those resources for which they have the potential to occur (e.g., population and housing, cultural resources, air quality, and biological resources). Both planlevel and cumulative-level impacts are analyzed. Plan-level impacts could result from actions related to implementation of the proposed plans. Cumulative-level impacts could result from implementation of the proposed plans in combination with other identified cumulative projects in the study area. As discussed in "Cumulative Setting" below, the projects listed in Table 3-1, in conjunction with the proposed plans, are considered the cumulative scenario for the analysis of cumulative impacts.

Impacts are analyzed and the respective assessment and findings are provided, applying the following levels of significance:

- **No Impact.** A determination of No Impact is reached if no potential exists for impacts or if the environmental resource does not occur in the plan area or the area of potential impacts.
- Less Than Significant Impact. This determination applies if the impact does not exceed the defined significance criteria or would be eliminated or reduced to a less than significant level through compliance with existing local, state, and federal laws and regulations. No mitigation is required for impacts determined to be less than significant.
- Less Than Significant Impact with Mitigation. This determination applies if the proposed plans would result in a significant impact, exceeding the established significance criteria, but feasible mitigation is available that would reduce the impact to a less than significant level.
- Significant and Unavoidable Impact. This determination applies if the proposed plans would result in an adverse impact that exceeds the established significance criteria, and no feasible mitigation is available to reduce the impact to a less than significant level. Therefore, the residual impact would be significant and unavoidable.

Impacts are defined in terms of their context and intensity. Context is related to the uniqueness of a resource; intensity refers to the severity of the impact. Where applicable, best management practices or improvement measures, or both, are incorporated into the proposed plans to limit the potential for a significant impact. Where necessary, mitigation measures are identified for significant impacts to limit the degree or lower the magnitude of the impact; rectify the impact by repairing, rehabilitating, or restoring the affected environment; or compensate for the impact by replacing or providing substitute resources or environments. These impacts conclude with a finding of Less than Significant Impact with Mitigation. Where no mitigation measures are necessary, relevant impacts are concluded to be Less than Significant or to have No Impact.

As part of the impact analysis, mitigation measures are identified, where feasible, for impacts considered significant or potentially significant consistent with CEQA Guidelines Section 15126.4, which states that an EIR "shall describe feasible measures which could minimize significant adverse impacts." CEQA requires that mitigation measures have an essential nexus and be roughly proportional to the significant impact identified in the EIR. The project sponsors are required to

implement all identified mitigation measures identified in the Final EIR, and the lead agency (in this case, the City of Millbrae) is responsible for overseeing implementation of such mitigation measures.

Impacts are numbered and shown in bold type. The corresponding mitigation measures, where identified, are numbered and indented, and follow the impact statements. Impacts and mitigation measures are numbered consecutively within each topic and include an abbreviated reference to the impact section (e.g., "LU" for Land Use and Planning). The following abbreviations are used for individual topics:

- Aesthetics (AES)
- Air Quality (AQ)
- Biological, Agriculture, and Forestry Resources (BIO)
- Cultural and Tribal Cultural Resources (CR)
- Geology, Soils, and Mineral Resources (GEO)
- Greenhouse Gas Emissions and Energy (GHG)
- Hazards, Hazardous Materials, and Wildfire (HAZ)
- Hydrology and Water Quality (HYD)
- Land Use Planning, Population, and Housing (LU)
- Noise (NOI)
- Public Services and Recreation (PS)
- Transportation (TRA)
- Utilities and Service Systems (UTL)

Cumulative Impacts

This subsection evaluates the potential for the proposed plans in conjunction with other identified cumulative plans and projects (see Table 3-1) to result in cumulative impacts. The goal of this analysis is to determine whether the overall long-term impacts of all such plans and projects would be cumulatively significant, and to determine whether the proposed plans on their own would cause a "cumulatively considerable" incremental contribution to any such cumulatively significant impacts. To determine whether the overall long-term impacts of all such projects would be cumulatively significant impacts.

- The area in which impacts of the proposed plans would be experienced;
- The impacts of the proposed plans that are expected in the area;
- Other past, proposed, and reasonably foreseeable projects that have had or are expected to have impacts in the same area;
- The impacts or expected impacts of these other projects; and
- The overall impact that can be expected if the individual impacts from each project are allowed to accumulate.

"Cumulative impacts" refers to two or more individual impacts that, when considered together, are considerable, or that compound or increase other environmental impacts (CEQA Guidelines Section 15355). Cumulative impacts can result from individually minor but collectively significant impacts taking place over time. If the analysis determines that the potential exists for the proposed plans, taken together with other past, present, and reasonably foreseeable future projects, to result in a

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significant or adverse cumulative impact, the analysis then determines whether the proposed plans' incremental contribution to any significant cumulative impact is itself significant (i.e., "cumulatively considerable"). The cumulative impact analysis for each individual resource topic is presented in each resource section of this chapter immediately after the description of the direct impacts and identified mitigation measures.

Cumulative Scenario Setting

Table 3-1 lists the relevant cumulative plans and projects considered for the environmental analysis.

				Develo	pment Net Increa	se
Name	Jurisdiction	Land Uses	Units	Non-residential Gross Square Footage	Location	Status
Millbrae Active Transportation Plan	City of Millbrae	Bicycle and pedestrian pathways/ connections	-	-	Millbrae Citywide	Approved – under implementation
Millbrae Station Area Specific Plan	City of Millbrae	Residential, retail, office, hotel, and industrial	1,440	1,384,530	Millbrae Multi- modal Station Area	Approved – under implementation
San Francisco International Airport Development Plan	City and County of San Francisco	Airport ¹	-	-	San Mateo County	Approved – under implementation
South San Francisco 2040 General Plan	City of South San Francisco	Residential, retail, office, hotel, and industrial	14,312	14,100,523	South San Francisco Citywide	Draft Plan Released for Public Review February 2022
Burlingame 2040 General Plan	City of Burlingame	Residential, retail, office, hotel, and industrial	2,903	1,346,000	Burlingame Citywide	Approved – under implementation
San Bruno 2023- 2031 Housing Element	City of San Bruno	Residential	3,378	-	San Bruno Citywide	Draft Plan Released for Public Review May 2022
Plan Bay Area 2040	All Bay Area jurisdictions	Transportation , Residential	-	-		Approved – under implementation

Table 3-1 Cumulative Plans and Projects List

Source: Information compiled by Rincon Consultants in 2022.

¹ Includes redevelopment of the International Terminal Building, improved connectivity between terminals, a revamped baggage handling system, and a new international boarding area.

3.1 Aesthetics

This section evaluates the potential impacts to aesthetics that could arise from implementation of the proposed 2040 General Plan and the Millbrae Downtown and El Camino Real Specific Plan. The analysis includes possible impacts to scenic resources, visual character, and visual quality, as well as those arising from the possible introduction of new sources of light and glare. For the purposes of CEQA compliance, the visual quality analysis focuses on the potential for project implementation to result in a loss of scenic resources or to substantially degrade the visual character of the city, relative to the way the built environment relates to the natural setting.

3.1.1 Environmental Setting

Visual Character

Visual character in the California Environmental Quality Act (CEQA) context is an impartial description of the defining physical features, landscape patterns, and distinctive physical qualities within a landscape. Visual character is informed by the composition of land, vegetation, water, and structure and their relationship (or dominance) to one another, and by prominent elements of form, line, color, and texture that combine to define the composition of views. Visual character-defining resources and features within a landscape may derive from notable landforms, vegetation, land uses, building design and façade treatments, transportation facilities, overhead utility structures and lighting, historic structures or districts, or panoramic open space.

General Plan Area

Millbrae is located on the northern San Francisco Peninsula, 15 miles south of San Francisco and immediately west of the San Francisco International Airport. Millbrae's boundaries extend from Skyline Boulevard on the west to roughly the U.S. Highway 101 on the east. Neighboring areas include the City of San Bruno to the north, City of Burlingame to the south, and watershed lands within San Mateo County that are owned by the City and County of San Francisco to the west, and the San Francisco International Airport and San Francisco Bay (Bay) to the east. The surrounding natural setting features include undeveloped hillsides to the west and San Francisco Bay water to the east.

Millbrae is a mostly residential community characterized largely by one and two-story, single-family homes from west of the El Camino Real corridor to the western city boundary formed by Interstate 280 (I-280). The city is largely built out, with a limited amount of undeveloped open space within the city, along with parks, schools, and the Green Hills Country Club. Multi-family residencies occur throughout the single-family neighborhoods, but to a lesser degree and at limited density. Commercial development is concentrated along El Camino Real and Broadway, where older one-story structures intermingle with newer two- to five-story mixed-use development. A small industrial area occurs along Adrian Road and Rollins Road, west of U.S. Highway 101 and southwest of the airport. These buildings are contemporary office and industrial styles of architecture, with concrete walls, tinted glass windows, and neutral colors.

Specific Plan Area

The Specific Plan area, which straddles the El Camino Real corridor, traverses Millbrae from north to south and is located west of the airport and U.S. Highway 101 and makes up a major commercial

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corridor. The Specific Plan area extends from the northern-most edge of the city to the southern boundary with the City of Burlingame. Newer condominium and apartment complexes are integrated into the corridor and integrate architecturally with the older, historic-appearing commercial buildings, usidueng elements of Spanish-style architecture and other themes that create a developing sense of unity among the built environment components. While many of the multifamily residences are up to four stories, including facades and turrets, frontages are situated close to sidewalks, and street trees and other landscaping create transitions between public and private areas and the street. Further south along El Camino Real, commercial development segues to stripmall-style development with large, surface parking lots. Landscaping is less dense in this area, although street trees are included in roadway medians.

Broadway is a two-lane roadway that parallels El Camino Real and is within the Specific Plan area. Restaurants and commercial buildings occur along the east and west sides of the street. St. Dunstan Catholic Church presents a strong architectural form in the blocks southeast of Ludeman Lane and north of the Civic Center.

Scenic Resources

Most communities identify scenic resources as important visual assets that contribute to community identity. These resources can include landforms, trees, water features, and the built environment insofar as they enhance and define the visual character of a landscape. Scenic resources include natural and open spaces, as well as the built environment, particularly if certain architecture is of historic or artistic value.

General Plan Area

The General Plan area does not contain any City-designated scenic resources.

Specific Plan Area

The Specific Plan area does not contain any City-designated scenic resources.

Views

Views may be generally described as panoramic views of a large geographic area for which the field of view can be wide and extend into the distance. Associated vantage points provide an orientation from publicly accessible locations. Examples of distinctive views include urban skylines, valleys, mountain ranges, or large bodies of water. Viewshed is a term used to describe a range of resources and their context that relate to what people can see in the foreground, middle ground, and background distances.

General Plan Area

Viewers driving through Millbrae (i.e., the General Plan area) might be afforded views of the hills or the marshlands along the San Francisco Bay as they travel. Their exposure would vary based on proximity and ability to see the viewshed. Public views of the San Francisco Bay are also readily available from Bayfront Park, which is along the eastern border of the City, southeast of the airport.

Most buildings within the General Plan area are one to five stories, and views west from U.S. Highway 101 toward the western hillsides are visible beyond the industrial development. These views are not remarkable in their vividness as dense development prevents expansive vistas, but the hillsides are a notable part of the regional landscape and views, however limited, providing a sense of place and the context of the Peninsula.

Specific Plan Area

As summarized in Table 3.1-1, various publicly accessible locations in the Specific Plan area offer views toward and/or through the plan area. Figures 3.11 through 3.16 demonstrate some existing daytime views from the identified viewpoints.

Viewpoint Number	View Location Description
1	Looking North on El Camino Real and Millbrae Avenue
2	Looking North on El Camino Real and Meadow Glen Avenue
3	Looking West on El Camino Real and Millwood Drive
4	Looking East on Millbrae Avenue and Broadway
5	Looking Northeast on Broadway and Chadbourne
6	Looking South on Broadway and Taylor
Source: Rincon 2022	

Table 3.1-1	Summary of Viewpoint Locations for Existing Specific Plan Area Views
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Along El Camino Real within the Specific Plan area, short- and mid-range views are of one- and twostory retail, hotel, and restaurant uses that are located close to the sidewalks, with large frontage windows, integrated signage, and mostly well-maintained, ample street trees (Figure 3.1-1, Figure 3.1-2, and Figure 3.1-3). Long-range views of the San Francisco Bay to the east from within the Specific Plan area are limited by existing development and mature street trees (Figure 3.1-4). Views of the western hillsides are similarly limited throughout the corridor by mature trees, multistory development and density of development.

Buildings along Broadway are also situated close to the roadway, with pedestrian walkways and street trees between the shops and the street. Along the southeastern extent of Broadway, shortand mid-range views are of the retail centers and are close to the sidewalks with parking located along the street. The planted street median provides a landscaped corridor, and the multi-story retail/mixed-use areas provide a "Main Street" feel and offer a walkable area for residents and visitors (Figure 3.1-5). Views along Broadway looking southeast are of the built environment and mature trees that occur in the median, along roadways, and at intersections (Figure 3.1-6). There are no long-range views in any direction of the natural landscape, but the built environment is visually unified.



Figure 3.1-1 View 1: Looking North on El Camino Real and Millbrae Avenue

Figure 3.1-2 View 2: Looking North on El Camino Real and Meadow Glen Avenue





Figure 3.1-3 View 3: Looking West on El Camino Real and Millwood Drive

Figure 3.1-4 View 4: Looking East on Millbrae Avenue and Broadway





Figure 3.1-5 View 5: Looking Northeast on Broadway and Chadbourne

Figure 3.1-6 View 6: Looking South on Broadway and Taylor



Scenic Highways

The State Scenic Highway System includes a list of highways that are either eligible for designation as scenic highways or have been officially designated. The status of a proposed State Scenic Highway changes from eligible to officially designated when the local governing body applies to Caltrans for scenic highway approval, adopts a Corridor Protection Program, and receives notification that the highway has been officially designated a Scenic Highway.

General Plan Area

The portion of I-280 that runs along the western boundary of the Millbrae is an officially designated State scenic highway¹. However, I-280 alignment is below-grade or visually blocked by vegetation as it traverses the western boundary of Millbrae, and existing Millbrae land uses to the east are not visible to drivers traversing I-280. The extent of U.S. Highway 101 that traverses the eastern portion of Millbrae is not an officially designated or eligible State scenic highway.

Specific Plan Area

There are no officially designated State scenic highways on the eastern side of the City where the Specific Plan area is located.

Light and Glare

In the context of CEQA Guidelines, light is nighttime illumination that stimulates sight and makes things visible; glare is difficulty seeing in the presence of bright light such as direct or reflected sunlight.

General Plan Area and Specific Plan Area

Current light and glare levels within the General Plan area and Specific Plan area are consistent with urbanized development and include streetlights, exterior building lighting, and lighted signs. Primary sources of light are streetlights, parking lot lights, exterior building lighting, and lighted signs. Automobile headlights can also create temporary sources of light as they exit parking areas. Primary sources of glare include sunlight reflected in the windows of buildings, including glass façades, and the windshields of parked cars.

3.1.2 Regulatory Framework

Federal Regulations

No federal plans, policies, regulations, or laws related to aesthetics are applicable.

State Regulations

California Scenic Highway Program

The State Legislature created the California Scenic Highway Program, maintained by Caltrans, in 1963. The purpose of the State Scenic Highway Program is to protect and enhance the natural scenic beauty of California highways and adjacent corridors, through special conservation treatment. The State laws governing the Scenic Highway Program are found in the Streets and Highways Code,

¹ Caltrans. 2018. California State Scenic Highway System Map.

https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (accessed June 2022).

Sections 260 through 263. A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. The State Scenic Highway System includes a list of highways that are either eligible for designation as scenic highways or have been officially designated. The status of a proposed State Scenic Highway changes from eligible to officially designated when the local governing body applies to Caltrans for scenic highway approval, adopts a Corridor Protection Program, and receives notification that the highway has been officially designated a Scenic Highway. Caltrans has designated the extent of I-280 along the western boundary of Millbrae as a scenic highway.

California Code of Regulations Title 24 - Building Lighting Characteristics

California Building Code (California Code of Regulations [CCR], Title 24)—including Title 24, Part 6 includes Section 132 of the Building Energy Efficiency Standards, which regulates lighting characteristics, such as maximum power and brightness, shielding, and sensor controls to turn lighting on and off. Different lighting standards are set by classifying areas by lighting zone. The classification is based on population figures of the 2000 Census. Areas can be designated as LZ1 (dark), LZ2 (rural), or LZ3 (urban). Lighting requirements for dark and rural areas are stricter in order to protect the areas from new sources of light pollution and light trespass. The majority of Millbrae falls under the "urban" standard.

Local Regulations

Millbrae General Plan

The current Millbrae General Plan contains policies related to aesthetics, but they would be replaced by the proposed 2040 General Plan.

Millbrae Municipal Code

CHAPTER 10.05 - ZONING

Millbrae Municipal Code Chapter 10.05, Zoning, specifies building design standards, including density, height, parking, and setback requirements for commercial and residential uses within Millbrae. It also specifies that building heights do not exceed 40 feet, except in planned developments or the Millbrae Station Area Specific Plan area where permitted heights are up to 121 feet.

CHAPTER 6.25 - COMMUNITY PRESERVATION ORDINANCE

Millbrae Municipal Code Chapter 6.25, the Community Preservation Ordinance, enforces the maintenance of properties to improve the health, safety and welfare of the residents and the image of Millbrae. This includes the maintenance of vegetation on private properties.

CHAPTER 10.10.100(K) - LIGHT AND GLARE

Millbrae Municipal Code Section 10.10.100 (K) sets forth regulations for glare from signs, stating "all illuminated signs shall be designed in such a manner as to avoid undue glare or reflection of light that may diminish public safety, the quality of Millbrae's visual appearance or the quality of life of adjacent property owners or tenants."

3.1.3 Impacts and Mitigation Measures

Significance Criteria

The City of Millbrae utilizes the following 2022 CEQA Guidelines Appendix G significance criteria questions related to Aesthetics.

Would the 2040 General Plan or Specific Plan:

- a) Have a substantial adverse effect on a scenic vista?
- b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- c) In non-urbanized areas, substantially degrade existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
- d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Approach to Analysis

Aesthetic impact assessments involve qualitative analysis that is subjective but informed by the basic guidelines provided above. Reactions to the same aesthetic conditions vary according to viewer taste and interests. The project is a general plan and specific plan and not a concrete development proposal. This analysis focuses, therefore, on a general discussion of the aesthetic impacts within the City of Millbrae, in terms of the arrangement of built space to open space, the density and intensity of development, and how new development visually fits with the existing landscape characteristic of the area.

Scenic Vistas and Resources

For the purposes of this analysis, a scenic vista is a view from a public place (roadway, designated scenic viewing spot, etc.) that is expansive and considered by the City to be important. It can be obtained from an elevated position (such as from the top of a hillside) or it can be seen from a roadway with a longer-range view of the landscape. An adverse effect would occur if a proposed development would block or otherwise damage the scenic vista upon implementation.

Visual Character and Views

The impacts on visual character or quality attributable to General Plan and Specific Plan implementation were evaluated relative to visual conditions under buildout, estimated by those experienced from public viewpoints in and around the City. Photographs of the City were taken and reviewed in preparation of this analysis, along with Google Earth imagery and other online visual sources. Given that the proposed plans would be located in urbanized areas, the impact discussion of visual character and views is focused on consistency with applicable zoning and other regulations governing scenic quality.

Light and Glare

The analysis of light and glare impacts focuses on the nature and magnitude of changes in light and glare conditions associated with implementation of the proposed plans on the plan areas and surroundings. If the light and glare conditions of the proposed plans and the existing environment

are similar, then the visual compatibility would be high. If the light and glare conditions of the proposed plans strongly contrast with the existing light and glare or applicable policies and guidelines, then light and glare compatibility would be low and significant impacts may result. Proposed design standards and guidelines as well as proposed plan goals and policies are applied to determine the significance of light and glare impacts associated with the proposed plans.

EIR Scoping Comments Consideration

No comments relevant to CEQA were received in response to the EIR NOP specific to aesthetics that need to be addressed in the impacts discussion.

Specific Thresholds of Significance

The City of Millbrae has not adopted quantitative thresholds for the evaluation of aesthetics. The City applies the following qualitative thresholds based on adopted policies and guidelines to evaluate the significance of aesthetics impacts resulting from development.

- Block existing views from a scenic routes and corridors toward a visual/scenic resource (e.g., ridgeline)
- Be inconsistent with the character of the plan area or existing development in the surrounding area or would substantially alter existing natural topography
- Increase existing nighttime light or daytime glare sources in the plan area or vicinity in a manner that would substantially affect nighttime or daytime views

Impact Evaluation

Effects on Scenic Vistas

Significance Criterion a:	Would the proposed plans have a substantial adverse effect on a scenic
	vista?

Impact AES-1 THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD FACILITATE DEVELOPMENT IN AREAS ALONG AN URBANIZED CORRIDOR THAT DO NOT OFFER NOTABLE SCENIC VISTAS THROUGH THE PLAN AREAS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Impacts related to substantial adverse effects on a scenic vista are limited to operational impacts. Due to the temporary nature of construction, no respective construction impacts related to scenic vistas would result from implementation of the proposed plans.

Operation

2040 GENERAL PLAN

Millbrae includes longer range views from public streets in the western hillside neighborhoods eastward toward the San Francisco Bay across the urbanized landscape of Millbrae and cities beyond, to the north and south. Although none of these views are designated as "vistas" or "scenic corridors" in the existing General Plan or the proposed 2040 General Plan. All proposed substantial land use changes of the 2040 General Plan area would occur within the Specific Plan area. The entirety of the Specific Plan area falls within the General Plan area; as such, the analysis below under Specific Plan would also apply to the 2040 General Plan. Additionally, development implemented under the 2040 General Plan would be subject to the following policy that addresses scenic vistas:

Policy LU-3.4 Minimize Privacy and View Impacts. The City shall require residential additions, and new residences to be designed in a manner that respects the privacy of nearby homes, provides access to sunlight, and minimizes obstruction of primary panoramic or scenic views of the San Francisco Bay from principal rooms of a residence, consistent with objective residential design standards.

Therefore, impacts of development facilitated by the 2040 General Plan related to scenic vistas would be less than significant.

SPECIFIC PLAN

Most of the development facilitated by the Specific Plan would occur along El Camino Real and Broadway. This area is highly urbanized with retail, restaurant, hotel, and industrial uses, with buildings up to four stories in some places, although generally buildings do not exceed 40 feet in height on El Camino Real. Along Broadway, uses include churches, civic buildings, and retail complexes with surface parking lots between El Camino Real and Broadway. These structures are also up to 40 feet high, although in some cases the additional height is from a single spire (e.g., the church). From streets west of the Specific Plan area, such as Ludeman Lane, looking east toward El Camino Real long-range views are available of high-rise development near the airport and of the hillsides in the distance. However, views from El Camino Real and Broadway are largely limited by intervening development, mature landscaping, and large street or median trees. Even from the most elevated streets in the western part of Millbrae, views of the San Francisco Bay and of the urban and natural landscape are not widely available due to the density of intervening development, mature landscaping, and street orientation.

Development facilitated by the Specific Plan would largely be infill, some of which could be up to 125 feet in height, on parcels shown in Figure 2-10 in Section 2, *Project Description*. From western streets and public places (e.g., parks) in Millbrae, intervening development prevents expansive views to the east. Views in either direction down El Camino Real are of the built environment, including older storefronts, which occur close to the sidewalk and are generally one to two stories on the northerly end, and newer residential, retail, and hotel uses mid-town and at the southerly end that are up to four stories. Most streets immediately west of this area do not have views across the El Camino Real corridor toward the Bay or other scenic resources because of intervening development and heavy urban forestation on private properties and beside roadways (see Figure 3.1-2 and Figure 3.1-3 for example views). Similarly, on Broadway, views of the San Francisco Bay and the natural environment are prevented by one- to four-story development, although views down the street of the built environment and street trees are intact and create a sense of place.

Millbrae Municipal Code Chapter 10.05 limits the maximum height of multi-family residences and commercial development to 40 feet. The Specific Plan would allow an increase of building height of up to 125 feet, which would limit views to surrounding areas if there were scenic vistas in place. However, expansive views are already limited by existing development and mature trees. Furthermore, development facilitated by the Specific Plan would be required to adhere to the following Specific Plan Design Guidelines:

DS-1 Development Intensity, Density, and Height

Development intensity and building height are defining features in establishing the overall character, aesthetics, and experience of a place. The Downtown and El Camino Real Specific Plan uses, Floor Area Ratio (FAR), residential densities and building height to regulate the building envelope.

- DS-1.1 All new development in the Plan Area shall comply with the maximum allowed building heights illustrated in Fig. 5.2. [of the Specific Plan]. The Specific Plan proposes taller heights on parcels along El Camino Real for appropriately scaling buildings to the width of El Camino Real and to allow for higher intensity development on the corridor. The Plan proposes to step down heights of buildings or portions of buildings fronting Broadway Avenue, and on along the eastern edge of the Plan Area.
- **DS-1.2** In mixed-use buildings with non-residential ground floor uses, minimum ground floor height from finished floor to finished ceiling shall be 14'. Recommended height of nonresidential ground floor is 18'-20' to allow for high quality retail/ restaurants/office spaces and stacked parking behind active frontage In buildings with residential use on the ground floor, the plinth shall be raised above street level by a minimum of 3' and maximum of 4' for providing privacy in ground floor units.
- **DS 1.3** Roof mounted equipment, solar panels, etc. shall be excluded from building height calculations, but shall be fully screened from view.
- **DS 1.4** Rooftop elements that may need to exceed maximum building height shall not exceed 15' beyond the maximum height limit.
- **DS 1.5** Architectural elements used for articulating building corners shall not exceed more than 10' above maximum building height limit, subject to the maximum heights in the San Francisco International Airport Land Use Compatibility Plan.

DS-3 Massing and Modulation

Building massing, modulation of form and facade articulation all help to break the monotony of a continuous building edge and to create a visually rich street environment. Especially in larger buildings they help to break down the mass and create a transition that is appropriately scaled to the street or adjacent buildings. The modulation can occur both vertically and horizontally in a building by creating visual breaks in continuous length of a facade.

DS-3.1 Horizontal Breaks. Buildings taller than four stories shall have a horizontal break to clearly distinguish the ground floor from upper floors. The distinction can be made by recessing the ground floor, stepping back floors above the ground floor, using different materials or architectural features such as arcades, columns, and window designs.

Development facilitated by the Specific Plan would be concentrated along El Camino Real and Broadway in areas where scenic vistas are not widely available from public viewing areas. Although new development facilitated by the Specific Plan would increase height and density along El Camino Real and Broadway, it would be subject to goals, policies, and design guidelines in the Specific Plan that would ensure scenic vistas would continue to be available where they exist. Impacts would be less than significant. Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Effects to Scenic Resources within State Scenic Highways

Significance Criterion b:	Would the proposed plans substantially damage scenic resources,
	including but not limited to, trees, rock outcroppings, and historic
	buildings within a State scenic highway?

Impact AES-2 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND THE SPECIFIC PLAN WOULD NOT BE VISIBLE FROM DESIGNATED OR ELIGIBLE SCENIC HIGHWAYS. THERE WOULD BE NO IMPACT.

Construction

Impacts related to substantial damage to scenic resources are limited to operational impacts. No respective construction impacts would occur under development facilitated by the proposed plans.

Operation

2040 GENERAL PLAN

The closest designated State Scenic Highway to the Millbrae is I-280, which is designated as such from SR 17 in Santa Clara County to SR 80 near First Street in San Francisco. This roadway lies at the western boundary of Millbrae.

All proposed substantial land use changes of the 2040 General Plan area would occur within the Specific Plan area. The entirety of the Specific Plan area falls within the General Plan area; as such, the analysis below under Specific Plan would also apply to the 2040 General Plan. Furthermore, there are no City-designated scenic resources within the General Plan area. Therefore, the 2040 General Plan would result in no impact related to effects on scenic resources within a State scenic highway, considering that views from I-280 are fleeting and generally obstructed by vegetation.

SPECIFIC PLAN

I-280 is roughly 1.5 miles east of the nearest Specific Plan area at which point the freeway alignment is lower than the adjacent hilly topography and generally obstructed by vegetation, and as such Millbrae itself is not visible from I-280. No development would be facilitated by the Specific Plan near this State-designated Scenic Highway. Furthermore, there are no City-designated scenic resources within the Specific Plan area. Therefore, the Specific Plan would result in no impact related to effects on scenic resources within a State scenic highway.

Mitigation Measures

No mitigation is required.

Level of Significance Less than significant without mitigation

Effects to Visual Character or Quality of Public Views

Significance Criterion c:	Would the proposed plans, in non-urbanized areas, substantially degrade
	the existing visual character or quality of public views of the site and its
	surroundings? (Public views are those that are experienced from a publicly
	accessible vantage point). If the proposed plans are in an urbanized area,
	would the project conflict with applicable zoning and other regulations
	governing scenic quality?

Impact AES-3 INDIVIDUAL PROJECTS FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD HAVE THE POTENTIAL CHANGE THE VISUAL CHARACTER IN THE CORRIDOR ALONG EL CAMINO REAL AND BROADWAY. HOWEVER, SUCH PROJECTS WOULD BE REQUIRED TO COMPLY WITH GOALS, POLICIES, STANDARDS, AND GUIDELINES IN THE 2040 GENERAL PLAN AND SPECIFIC PLAN THAT WOULD REDUCE IMPACTS TO LESS THAN SIGNIFICANT LEVELS.

Construction

Impacts related to substantial degrading of visual character or quality of public views are limited to operational impacts. No respective construction impacts would occur under development facilitated by the proposed plans.

OPERATION

2040 GENERAL PLAN

The 2040 General Plan would encourage development that compliments the existing natural and built environment and specifies transitions from one land use to another through design strategies. All proposed land use changes of the 2040 General Plan area would occur under the Specific Plan. The entirety of the Specific Plan area falls within the General Plan area; as such, the analysis below under Specific Plan would also apply to the 2040 General Plan. Additionally, the following 2040 General Plan goals and policies related to visual character and quality would reduce impacts:

- Goal LU-3 Preserve and enhance the identity and qualities of Millbrae's distinct residential neighborhoods to ensure Millbrae remains a desirable place to live.
 - **Policy LU-3.1** Neighborhood Character. The City shall strive to ensure that all new construction, additions, or remodeling projects are compatible with the architecture of the building, surrounding neighborhood and of the community as a whole.
 - **Policy LU-3.2 Residential Design Standards**. The City shall prepare and implement Residential Design Standards to ensure consistency with current local, regional, and State laws, as well as industry standards.
 - **Policy LU-3.3 Residential Design Review.** To support and enhance the existing character of Millbrae's distinct neighborhoods, the City shall require design review of new single-family residences and large second story additions to ensure compatibility of new projects with objective residential design standards, including architectural style, scale, mass, bulk, color, materials, FAR, lot coverage, hillside grading, landscaping, and setbacks.

- Goal LU-4 Enhance the area within the Downtown and El Camino Real Specific Plan boundary into a vibrant and accessible destination for residents, employees, and visitors.
 - **Policy LU-4.1 Downtown and El Camino Real Specific Plan Compliance.** The City shall ensure that new development within the Specific Plan boundary complies with the land use regulations and development standards in the Downtown and El Camino Real Specific Plan.
 - Policy LU 4.3 Mix of Commercial Uses. The City shall promote a mix of commercial uses that support a day and evening environment within the Downtown and El Camino Real Specific Plan boundary, including retail, services, restaurants, entertainment venues, hotels, fitness centers, and offices.
 - Policy LU-4.4 Pedestrian Safety and Connectivity. The City shall improve pedestrian safety and connectivity between the Millbrae Station and Downtown, ensuring appropriate crossings along El Camino Real.
 - **Policy LU-4.5 Community Gathering Places.** The City shall encourage the development of community gathering places within the Downtown and El Camino Real Specific Plan boundary, such as plazas, parklets, and pocket parks.
- Goal LU-5 Enhance Downtown as a vibrant, pedestrian-scaled district with a mix of land uses that elevates the prominence of the area and fosters investments in Millbrae
 - **Policy LU-5.1** Vertical Mixed Use. The City shall encourage vertical mixed-use in Downtown with active ground floor uses and residential and office uses on the upper floors.
 - **Policy LU-5.2 Community Anchor.** To create a community gathering place and to attract more pedestrian traffic in Downtown, the City shall encourage the development of a community anchor on the northern end of Downtown, consistent with the goals, policies, and development standards in the Downtown and El Camino Real Specific Plan.
- Goal LU-6 Revitalize El Camino Real into a "grand boulevard" by encouraging transit-oriented, mixed-use development with an inviting pedestrian environment.
 - **Policy LU-6.1 Transition in Scale.** As specified in the Specific Plan, the City shall ensure new development incorporates a transition in scale between high-density development along El Camino Real and adjacent neighborhoods through use of setbacks and step-backs as new development gets closer to property lines.
 - **Policy LU-6.3 Public Realm.** The City shall improve and enhance the public realm along El Camino Real through landscaping, streetscape improvements, safety improvements, architectural elements, and similar improvements to create a welcoming gateway into the city.
- Goal LU-9 Ensure high-quality site planning, landscaping, and architectural design for all new construction, renovation, or remodeling.
 - **Policy LU-9.1 Design Character.** The City shall encourage new development projects and substantial additions and remodels to include design elements that contribute to the area's character and sense of place.

- **Policy LU-9.2 Transition in Scale and Form.** The City shall ensure higher-density development adjacent to existing residential neighborhoods provide transitions in scale and form through objective design standards.
- **Policy LU-9.3 Community Preservation Ordinance.** The City shall continue to administer and enforce the Community Preservation Ordinance to maintain quality of life.
- **Policy LU-9.4 Trees and Landscaping.** The City shall protect the existing tree canopy and encourage tree planting including drought-tolerant landscaping and green infrastructure.

Buildout associated with the 2040 General Plan would not conflict with the aforementioned goals and policies. Therefore, impacts of development facilitated by the 2040 General Plan related to visual character or quality would be less than significant.

SPECIFIC PLAN

Millbrae is largely built out with a mix of single-family residences in the western part of Millbrae and commercial, visitor serving, and light industrial along the El Camino Real and Broadway corridor, which constitutes the downtown, in the eastern part of Millbrae. As such, the Specific Plan would facilitate development of new and redeveloped mixed-use (commercial and multi-family residential) land uses along El Camino Real and Broadway, an already developed area of Millbrae. This would largely constitute infill development, including a mix of heights, architectural styles, and open spaces, that would increase density and the urbanization of that corridor. Land use and zoning changes are proposed under the Specific Plan that would allow increased residential densities and building heights, and reduced parking requirements near the Millbrae Station. Throughout the Specific Plan residential and commercial design standards are included that address building massing, transitions, scale, orientation, exterior building materials, and the inclusion of public art, such as murals or outdoor sculpture, as part of the building and open space design. However, the Specific Plan proposes increased heights over what is allowed under the current City Zoning. Where the current height limit is 40 feet along El Camino Real and 30 feet along Broadway, the Specific Plan would allow buildings that range from 55 to 85 feet in both areas, with some portions of the Specific Plan area allowing buildings up to 125 feet on El Camino Real. These height changes would constitute a considerable change from existing conditions and would require a change to the existing zoning code.

As stated in Section 3.1.1, *Setting*, the visual quality ranges from moderately low in areas where buildings are in disrepair and landscaping is not maintained to high where new development, renovations, and landscaping make for a vivid sense of place along El Camino Real. Broadway largely has a higher visual quality as buildings are unified with one another architecturally and landscaping is ample, mature, and well-maintained. At the more southerly end of Broadway, the commercial development that includes the Safeway, the back-facing structures create a "Main Street" feeling due to their placement close to the pedestrian walkways, street parking, and median landscaping. These attributes give this area a strong sense of place.

New development in the Specific Plan is intended to increase visual quality, sense of place, and overall unity of the built environment throughout the downtown area. Furthermore, the Specific Plan specifies that open spaces and public art be included in the design so that long blank walls do not occur, and that outdoor seating areas or internal pocket parks offer visual breaks from the horizontal built environment. Finally, the detailed design specifications included in the Specific Plan

and presented below would require that projects be designed in a manner that "create[s] a visually rich street environment" with variation in design, orientation, placement, and massing.

The design standards in the Specific Plan would work in parallel with the 2040 General Plan to establish the policy framework for the downtown and El Camino Real corridor. The development standards and guidelines are intended to achieve elements of good design that are essential to creating the overall character, aesthetics, and experience of a place. Standards and guidelines in the Specific Plan encourage compatibility with existing development, design of architecturally interesting and appropriately scaled buildings, and are intended to create high-quality public spaces and streetscape. Specifically, development standards and guidelines regulate lot coverage, building placement, size, height, and massing through objective and measurable rules. Additionally, the Specific Plan Design Guidelines related to development intensity, density, height, setbacks, and massing as well as the following Specific Plan goals and policies related to visual character and quality would reduce impacts:

- Land Use Goal Cultivate a pedestrian oriented, mixed-use environment in the downtown and along El Camino Real that supports vibrant commercial activity, maximizes transit use, enhances quality of life, and is well-scaled with surrounding neighborhoods.
 - **Policy LU-1** Infill Development. The City shall support high quality infill development that provides a rich mix of businesses, housing types, and community-serving uses and encourage public transit, walking, and biking.
 - Policy LU-2 Mixed Use Development. The City shall encourage vertical mixed-use development with active ground floor uses, and residential and office uses on the upper floors.
 - Policy LU-3 El Camino Real. The City shall prioritize higher density and intensity development along El Camino Real and establish a multimodal complete street, lined with a diverse mix of uses that are context sensitive and includes an attractive streetscape design that creates an inviting pedestrian environment and a positive city image.
 - **Policy LU-4 Downtown.** The City shall encourage a mix of small- scale, infill development with community gathering places that serves residents and attracts more pedestrian traffic, while enhancing the charming character of downtown.
 - **Policy LU-6 Community Anchor.** The City shall establish a "community anchor" on the northern end of downtown to draw pedestrian traffic from the inter-modal Station along El Camino Real and through downtown. The community anchor will support large format development such as specialty retail, hospitality, entertainment venues, meeting facilities, and outdoor public space such as a park or plaza.
 - **Policy LU-7** Neighborhood Anchor. The City shall establish a neighborhood anchor on the northern end of El Camino Real to provide a compact concentration of neighborhood-serving uses, including retail, a grocery store, cafes, restaurants, entertainment, and small offices. The neighborhood anchor should include small public spaces, such as a courtyards or parklets.

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- Urban Design Goal Create districts with a distinct character that is well designed and creates a sense of place while being sensitive to surroundings.
 - **Policy UD-1 El Camino Real Experience.** The City shall support opportunities that transform El Camino Real into a livable corridor with enhanced streetscape design, street planting and buildings with high-quality architectural design, well-articulated facades and high-quality materials.
 - **Policy UD-2 Downtown Experience.** The City shall enhance the downtown experience for residents and visitors by building on downtown's fine-grain fabric and quaint character, enhance the streetscape design, incorporate wayfinding, offer an outdoor dining experience, and incorporate social gathering spaces.
 - **Policy UD-3 Building Orientation.** Require projects to orient entrances and frontages toward major roads, intersections, and public spaces.
 - Policy UD-4 Active Frontage. The City shall require buildings along Broadway Avenue and El Camino Real to maximize street-activating retail and non-retail ground floor uses to create a vibrant and active street environment.
 - **Policy UD-5** Integrate New Development. The City shall require new development to be integrated within the existing fabric of the surrounding neighborhoods to contribute to a cohesive community, by including well-scaled buildings, compatible programming, pedestrian connections and public spaces.
 - Policy UD-6 Transition in Scale. The City shall ensure new development has an appropriate transition in scale between high density, mixed-use development along El Camino Real and adjacent neighborhoods by establishing objective development standards for building setbacks, upper floor stepbacks, building massing, and articulation.

Development implemented under the Specific Plan would be infill development in an urbanized area that would be required to conform with the updated design guidelines as well as visual resource goals and policies that the Specific Plan proposes, intended to increase the visual quality of the Specific Plan area, create a more unified visual experience, and fill in vacant and undesirable visual areas with attractive and economically vibrant new development. The Specific Plan would allow for an increase in height and density but would also require that all future projects conform with design standards and policies that ensure high-quality architectural and site design that would create a sense of place and increase visual quality and unity throughout the entire Specific Plan area. Furthermore, approval of the Specific Plan would initiate revisions to the City's Zoning Code to accommodate the increased height allowance. With this revision and adherence to Specific Plan design guidelines and goals/policies as well as updated ordinances, impacts related to visual character and views would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Effects of New Source of Light or Glare

Significance Criterion d: Would the proposed plans create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact AES-4 DEVELOPMENT FACILITATED BY THE PROPOSED PLANS WOULD CREATE NEW SOURCES OF LIGHT OR GLARE THAT COULD ADVERSELY AFFECT DAYTIME OR NIGHTTIME VIEWS IN THE AREA. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION MEASURES INCORPORATED.

Construction

Impacts related to light and glare are typically limited to operational impacts. In addition, most construction facilitated by the proposed plans would occur during the daytime, limiting potential for construction-related, temporary nighttime lighting impacts. Construction-related nighttime lighting would be used at future project construction sites only for safety and security purposes. As such, no construction light and glare impacts are anticipated related to implementation of the proposed plans.

Operation

2040 GENERAL PLAN

Proposed substantial land use changes of the 2040 General Plan area would occur under the Specific Plan. The entirety of the Specific Plan area falls within the General Plan area; as such, the analysis below under Specific Plan would also apply to the 2040 General Plan. Therefore, operational impacts of development facilitated by the 2040 General Plan related to light or glare would be less than significant with Mitigation Measure AES-1.

SPECIFIC PLAN

Millbrae is an urbanized city with a commensurate degree of light and glare. New development associated with implementation of the Specific Plan would, in large part, occur as infill development of unused parcels between existing built sites or redevelopment of existing built sites on already developed parcels along the extent of El Camino Real at the eastern portion of the City. New lighting could occur on buildings for safety and in pedestrian walkways, and light could be emitted from interior sources through windows on upper stories of tall (up to 125 feet) buildings. The main source of glare would likely be from the sun shining on the windows of parked cars associated with uses at the new development or reflective building surfaces or windows. When facilities such as parking lots are replaced with buildings, these replacements may reduce nighttime sources of light, because parking lots are often more brightly lit during the nighttime than most buildings. Infill development of underutilized or vacant parcels may result in new light sources, but they would likely be congruous with nearby light sources (e.g., lighting from shop windows, or upper story residential windows). Furthermore, as the infill development facilitated by the Specific Plan would largely be mixed-use with residential units on the upper stories and retail stores or services on the ground floor, light from windows at light would be limited to normal business hours for the ground floor and would be filtered or obscured by window coverings in the residential units.

Finally, as the infill development within the Specific Plan area along El Camino Real and Broadway would occur along a major transit corridor, proposed land uses would be designed to encourage alternative forms of transportation, and surface parking lots would be limited or replaced with other

forms of parking. Additionally, implementation of 2040 General Plan Policy M-4.8 requires parking lot design to consider lighting, as follows:

Policy M-4.8 Parking Lot and Garage Design. The City shall require new development to design parking lots and garages to be located away from the street, landscaped, and have directional lighting or other lighting techniques to minimize light and glare impacts on surrounding uses.

Therefore, glare associated with parked cars would be reduced.

New development would be subject to lighting goals and policies, and standards and guidelines presented in the Specific Plan, which would facilitate development that would increase lighting in the city, particularly along the El Camino Real and Broadway corridors. The City's Municipal Code currently does not contain specific regulations that limit light levels or specify lighting standards on new development, including exterior safety lighting on high-rise buildings, or light spillage. (It does contain regulations for lighted signage.) Furthermore, with the development of buildings up to 125 feet in height, exterior materials, such as glass, stainless steel, and other reflective surfaces could increase glare.

Therefore, Mitigation Measure AES-1 would be necessary to ensure operational light and glare levels associated with future development under the Specific Plan would be less than significant.

Mitigation Measures

MITIGATION MEASURE AES-1: ADOPT AND IMPLEMENT CITY LIGHTING STANDARDS

The City shall adopt lighting standards intended to maintain ambient lighting levels. Area lighting should provide good visibility, minimum glare, and minimum spillage onto other properties or into the sky. Adoption of this regulation would encourage, through the regulation of the types, kinds, construction, installation and uses of outdoor electrically powered illuminating devices, lighting practices and systems to conserve energy without decreasing safety, utility, security, and productivity while enhancing nighttime enjoyment of property and night skies.

Level of Significance

Less than significant with mitigation

3.1.4 Cumulative Impacts

The geographic scope of the cumulative aesthetics analysis is the visible areas within and surrounding the General Plan and Specific Plan areas. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Impact Analysis*) located in Millbrae, Burlingame, South San Francisco, and at the San Francisco International Airport in addition to the proposed plans.

Visual Character

Development facilitated by the proposed plans, in conjunction with other cumulative plans and projects listed in Table 3-1 could result in impacts to scenic vistas, scenic resources, and visual quality, although largely visual quality would improve with redevelopment of aging buildings and sparsely landscaped areas. Cumulative plans and projects are anticipated to increase development in areas already developed with other uses. Cumulative plans and projects located in Millbrae,

adjacent cities, and San Mateo County would be required to undergo analysis for impacts related to scenic vistas, scenic resource, and visual quality. These impacts would be mitigated by design guidelines, regulations, policies, and project-specific mitigation measures, thereby limiting damage to existing scenic resources and enhancing the visual quality of areas where development occurs. Consequently, future residential development facilitated by cumulative development would not result in significant cumulative environmental impacts in conflict with requirements for preserving scenic vistas, scenic resources in State- or locally designated highways or drives, or visual quality. Therefore, the cumulative impact related to visual character would be less than significant.

Light and Glare

Cumulative plans and projects in Millbrae, adjacent cities, and San Mateo County would be required to undergo analysis for impacts related to light and glare. Such impacts would be mitigated by design guidelines, regulations, policies, and project-specific mitigation measures, thereby limiting damage related to light and glare in and near areas where development occurs. Consequently, future development facilitated by cumulative plans and projects would not result in significant cumulative environmental impacts in conflict with requirements for limiting the effects of light and glare. Therefore, the cumulative impact related to light and glare would be less than significant.

Overall Level of Cumulative Significance

Less than significant

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3.2 Air Quality

3.2.1 Introduction

This section describes existing air quality conditions regionally and within the City of Millbrae as well as the relevant regulatory framework. This section also analyzes the possible impacts related to air quality (specifically with regard to emissions of criteria pollutants and toxic air contaminants) that could result from implementation of the 2040 General Plan and Specific Plan. Information included in this section is based partially on the vehicle miles traveled (VMT) data drawn from the Millbrae 2040 General Plan and Downtown and El Camino Real Specific Plan Transportation Impact Analysis (TIA), which is included as Appendix A to this EIR.

3.2.2 Environmental Setting

Regional Climate and Meteorology

Millbrae is located in San Mateo County and is on the peninsula of the San Francisco Bay Area Air Basin (SFBAAB), which is a subregion of the SFBAAB. The SFBAAB includes the counties of San Francisco, Santa Clara, San Mateo, Marin, Napa, Contra Costa, and Alameda, along with the southeast portion of Sonoma County and the southwest portion of Solano County. San Mateo County is bounded on the west by the Pacific Ocean, on the east by the San Francisco Bay, on the south by Santa Clara County, and on the north by San Francisco County.

The peninsula subregion extends from northwest of San Jose to the northern end of San Francisco. The Santa Cruz Mountains run up the center of the peninsula, with elevations exceeding 2,000 feet at the southern end, decreasing to 500 feet in South San Francisco. Millbrae is an inland city the lies more in the northeastern section of the peninsula with the Santa Cruz Mountains creating a blocking effect, which results in coastal cities and San Francisco experiencing cooler temperatures due to the prevailing winds off the coast and cities in the southeastern peninsula experiencing warmer temperatures and fewer foggy days because the marine layer is blocked by the ridgeline to the west. In addition, there are two gaps in the Santa Cruz Mountains that influences temperatures and wind speed called the San Bruno Gap and the Crystal Springs Gap. The former extends from Fort Funston to the San Francisco International Airport, while the latter is between Half Moon Bay to San Carlos. ¹ Millbrae's meteorology is affected by its inland location and its proximity to the San Bruno Gap.

The average daily temperatures in Millbrae (based on meteorology data measured at the San Francisco International Airport) is 59 degrees Fahrenheit (°F), the average low temperature is 51°F, and the average high temperature is 67°F. The average wind speed is 11 miles per hour with winds traveling from the northwest to the southeast.²

In winter, the SFBAAB experiences periods of storminess, moderate-to-strong winds, and periods of stagnation with very light winds. Winter stagnation episodes are characterized by outflow from the Central Valley, nighttime drainage flows in coastal valleys, weak onshore flows in the afternoon, and otherwise light and variable winds.

¹ Bay Area Air Quality Management District [BAAQMD]. 2017a. California Environmental Quality Act Air Quality Guidelines. May. https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en (accessed March 2022). ² Iowa Environmental Mesonet. 2022. CA ASOS San Francisco Intl Monthly Summaries. N.d.

https://mesonet.agron.iastate.edu/sites/monthlysum.php?station=SFO&network=CA_ASOS (accessed March 2022).

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

A primary factor in air quality is the mixing depth (the vertical air column available for dilution of contaminant sources). Generally, the temperature of air decreases with height, creating a gradient from warmer air near the ground to cooler air at elevation. This is caused by most of the sun's energy being converted to sensible heat at the ground, which in turn warms the air at the surface. The warm air rises in the atmosphere, where it expands and cools. Sometimes, however, the temperature of air actually increases with height. This condition is known as temperature inversion, because the temperature profile of the atmosphere is "inverted" from its usual state. Over the SFBAAB, the frequent occurrence of temperature inversions limits mixing depth and, consequently, limits the availability of air for dilution.

Air Pollutant Types, Sources, and Effects

Criteria Air Pollutants

Concentrations of criteria air pollutants are used as indicators of air quality conditions. Air pollutants are termed criteria air pollutants if they are regulated by developing specific public health and welfare-based criteria as the basis for setting permissible levels. According to the United States Environmental Protection Agency (USEPA), criteria air pollutants are ozone, particulate matter (PM₁₀ and PM_{2.5}), nitrogen dioxide (NO₂), carbon monoxide (CO), lead, and sulfur dioxide (SO₂). Criteria air pollutants are defined in more detail under Section 3.2.3, Regulatory Framework. Table 3.2-8 provides a summary of the types, sources, and effects of these criteria air pollutants of national and California concern.

Criteria Air Pollutant	Physical Description and Properties	Sources	Most Relevant Effects from Pollutant Exposure
Ozone	Ozone is a photochemical pollutant as it is not emitted directly into the atmosphere, but is formed by a complex series of chemical reactions between volatile organic compounds (VOC), nitrous oxides (NO _X), and sunlight. Ozone is a regional pollutant that is generated over a large area and is transported and spread by the wind.	Ozone is a secondary pollutant; thus, it is not emitted directly into the lower level of the atmosphere. The primary sources of ozone precursors (VOC and NO _x) are mobile sources (on- road and off-road vehicle exhaust).	Irritate respiratory system; reduce lung function; breathing pattern changes; reduction of breathing capacity; inflame and damage cells that line the lungs; make lungs more susceptible to infection; aggravate asthma; aggravate other chronic lung diseases; cause permanent lung damage; some immunological changes; increased mortality risk; vegetation and property damage.
Particulate matter (PM ₁₀) Particulate matter (PM _{2.5})	Suspended particulate matter is a mixture of small particles that consist of dry solid fragments, droplets of water, or solid cores with liquid coatings. The particles vary in shape, size, and composition. PM ₁₀ refers to particulate matter that is between 2.5 and 10 microns in diameter, (one micron is one-millionth of a meter). PM _{2.5} refers to particulate matter that is 2.5 microns or less in diameter, about one-thirtieth the size of the average human hair.	Stationary sources include fuel or wood combustion for electrical utilities, residential space heating, and industrial processes; construction and demolition; metals, minerals, and petrochemicals; wood products processing; mills and elevators used in agriculture; erosion from tilled lands; waste disposal, and recycling.	 Short-term exposure (hours/days): irritation of the eyes, nose, throat; coughing; phlegm; chest tightness; shortness of breath; aggravate existing lung disease, causing asthma attacks and acute bronchitis; those with heart disease can suffer heart attacks and arrhythmias. Long-term exposure: reduced lung function; chronic bronchitis; changes in lung morphology; death.

Table 3.2-1 Description of Criteria Air Pollutants of National and California Concern

Criteria Air Pollutant	Physical Description and Properties	Sources	Most Relevant Effects from Pollutant Exposure
		Mobile or transportation related sources are from vehicle exhaust and road dust. Secondary particles form from reactions in the atmosphere.	
Nitrogen dioxide (NO ₂)	During combustion of fossil fuels, oxygen reacts with nitrogen to produce nitrogen oxides— NO_X (NO, NO_2 , NO_3 , N_2O , N_2O_3 , N_2O_4 , and N_2O_5). NO_X is a precursor to ozone, PM_{10} , and $PM_{2.5}$ formation. NO_X can react with compounds to form nitric acid and related small particles and result in PM related health effects.	NO _x is produced in motor vehicle internal combustion engines and fossil fuel-fired electric utility and industrial boilers. Nitrogen dioxide forms quickly from NO _x emissions. NO ₂ concentrations near major roads can be 30 to 100 percent higher than those at monitoring stations.	Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; risk to public health implied by pulmonary and extra- pulmonary biochemical and cellular changes and pulmonary structural changes; contributions to atmospheric discoloration; increased visits to hospital for respiratory illnesses.
Carbon monoxide (CO)	CO is a colorless, odorless, toxic gas. CO is somewhat soluble in water; therefore, rainfall and fog can suppress CO conditions. CO enters the body through the lungs, dissolves in the blood, replaces oxygen as an attachment to hemoglobin, and reduces available oxygen in the blood.	CO is produced by incomplete combustion of carbon-containing fuels (e.g., gasoline, diesel fuel, and biomass). Sources include motor vehicle exhaust, industrial processes (metals processing and chemical manufacturing), residential wood burning, and natural sources.	Ranges depending on exposure: slight headaches; nausea; aggravation of angina pectoris (chest pain) and other aspects of coronary heart disease; decreased exercise tolerance in persons with peripheral vascular disease and lung disease; impairment of central nervous system functions; possible increased risk to fetuses; death.
Sulfur dioxide (SO ₂)	Sulfur dioxide is a colorless, pungent gas. At levels greater than 0.5 ppm, the gas has a strong odor, similar to rotten eggs. Sulfur oxides (SO _X) include sulfur dioxide and sulfur trioxide. Sulfuric acid is formed from sulfur dioxide, which can lead to acid deposition and can harm natural resources and materials. Although sulfur dioxide concentrations have been reduced to levels well below state and federal standards, further reductions are desirable because sulfur dioxide is a precursor to sulfate and PM ₁₀ .	Human caused sources include fossil-fuel combustion, mineral ore processing, and chemical manufacturing. Volcanic emissions are a natural source of sulfur dioxide. The gas can also be produced in the air by dimethyl sulfide and hydrogen sulfide. Sulfur dioxide is removed from the air by dissolution in water, chemical reactions, and transfer to soils and ice caps. The sulfur dioxide levels in the State are well below the maximum standards.	Bronchoconstriction accompanied by symptoms which may include wheezing, shortness of breath and chest tightness, during exercise or physical activity in persons with asthma. Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient sulfur dioxide levels. It is not clear whether the two pollutants act synergistically or one pollutant alone is the predominant factor.

Criteria Air	Physical Description and	Sources	Most Relevant Effects from
Pollutant	Properties		Pollutant Exposure
Lead	Lead is a solid heavy metal that can exist in air pollution as an aerosol particle component. Leaded gasoline was used in motor vehicles until around 1970. Lead concentrations have not exceeded state or federal standards at any monitoring station since 1982.	Lead ore crushing, lead- ore smelting, and battery manufacturing are currently the largest sources of lead in the atmosphere in the United States. Other sources include dust from soils contaminated with lead- based paint, solid waste disposal, and crustal physical weathering.	Lead accumulates in bones, soft tissue, and blood and can affect the kidneys, liver, and nervous system. It can cause impairment of blood formation and nerve conduction, behavior disorders, mental retardation, neurological impairment, learning deficiencies, and low IQs.

Air Resources Board (CARB); United States Environmental Protection Agency (USEPA); National Toxicology Program

Toxic Air Contaminants

Concentrations of toxic air contaminants (TAC) are also used as indicators of air quality conditions. TACs are defined as air pollutants that may cause or contribute to an increase in mortality or serious illness or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at very low concentrations. TACs can cause long-term health effects (such as cancer, birth defects, neurological damage, asthma, bronchitis, or genetic damage) or short-term acute affects (such as eye watering, respiratory irritation, runny nose, throat pain, or headaches). For those TACs that may cause cancer, there is no concentration that does not present some risk. In other words, there is no threshold level below which some adverse health impacts are not expected to occur. This contrasts with the criteria pollutants such as NO₂ and carbon dioxide (CO₂) for which acceptable levels of exposure can be determined and for which the State and federal governments have set ambient air quality standards.

TACs are separated into carcinogens and noncarcinogens based on the nature of the physiological effects associated with exposure to a particular TAC. Carcinogens are assumed to have no safe threshold below which health impacts would not occur. Cancer risk is typically expressed as excess cancer cases per million exposed individuals, typically over a lifetime exposure or other prolonged duration. For noncarcinogenic substances, there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels may vary depending on the specific pollutant. Acute and chronic exposure to noncarcinogens is expressed as a hazard index (HI), which is the ratio of expected exposure levels to an acceptable reference exposure levels.

To date, the California Air Resources Board (CARB) has designated nearly 200 compounds as TACs. CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. The majority of the estimated health risk from TACs can be attributed to a relatively few compounds, the most important being diesel particulate matter (DPM) from diesel-fueled engines. Common TACs of national and California concern include: DPM, volatile organic compounds (VOCs), benzene, asbestos, hydrogen sulfide, sulfates, visibility-reducing particulates, vinyl chloride, and lead. Table 3.2-2 provides a summary of these types, sources, and effects of TACs of national and California concern.

Toxic Air Contaminant	Physical Description and Properties	Sources	Most Relevant Effects from Pollutant Exposure
Diesel Particulate Matter (DPM)	Diesel PM is a source of PM _{2.5} — diesel particles are typically 2.5 microns and smaller. Diesel exhaust is a complex mixture of thousands of particles and gases that is produced when an engine burns diesel fuel. Organic compounds account for 80 percent of the total particulate matter mass, which consists of compounds such as hydrocarbons and their derivatives, and polycyclic aromatic hydrocarbons and their derivatives. Fifteen polycyclic aromatic hydrocarbons are confirmed carcinogens, a number of which are found in diesel exhaust.	Diesel exhaust is a major source of ambient particulate matter pollution in urban environments. Typically, the main source of DPM is from combustion of diesel fuel in diesel-powered engines. Such engines are in on- road vehicles such as diesel trucks, off-road construction vehicles, diesel electrical generators, and various pieces of stationary construction equipment.	Some short-term (acute) effects of DPM exposure include eye, nose, throat, and lung irritation, coughs, headaches, light- headedness, and nausea. Studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems. Human studies on the carcinogenicity of DPM demonstrate an increased risk of lung cancer, although the increased risk cannot be clearly attributed to diesel exhaust exposure.
Volatile Organic Compounds (VOCs)	Reactive organic gases (ROGs), or VOCs, are defined as any compound of carbon— excluding CO, CO ₂ , carbonic acid, metallic carbides or carbonates, and ammonium carbonate—that participates in atmospheric photochemical reactions. Although there are slight differences in the definition of ROGs and VOCs, the two terms are often used interchangeably.	Indoor sources of VOCs include paints, solvents, aerosol sprays, cleansers, tobacco smoke, etc. Outdoor sources of VOCs are from combustion and fuel evaporation. A reduction in VOC emissions reduces certain chemical reactions that contribute to the formulation of ozone. VOCs are transformed into organic aerosols in the atmosphere, which contribute to higher PM ₁₀ and lower visibility.	Although health-based standards have not been established for VOCs, health effects can occur from exposures to high concentrations because of interference with oxygen uptake. In general, concentrations of VOCs are suspected to cause eye, nose, and throat irritation; headaches; loss of coordination; nausea; and damage to the liver, the kidneys, and the central nervous system. Many VOCs have been classified as toxic air contaminants.
Benzene	Benzene is a VOC. It is a clear or colorless light-yellow, volatile, highly flammable liquid with a gasoline-like odor. The EPA has classified benzene as a "Group A" carcinogen.	Benzene is emitted into the air from fuel evaporation, motor vehicle exhaust, tobacco smoke, and from burning oil and coal. Benzene is used as a solvent for paints, inks, oils, waxes, plastic, and rubber. Benzene occurs naturally in gasoline at one to two percent by volume. The primary route of human exposure is through inhalation.	Short-term (acute) exposure of high doses from inhalation of benzene may cause dizziness, drowsiness, headaches, eye irritation, skin irritation, and respiratory tract irritation, and at higher levels, loss of consciousness can occur. Long- term (chronic) occupational exposure of high doses has caused blood disorders, leukemia, and lymphatic cancer.

Table 3.2-2 Description of Toxic Air Contaminants of National and California Concern

Toxic Air Contaminant	Physical Description and Properties	Sources	Most Relevant Effects from Pollutant Exposure
Asbestos	Asbestos is the name given to a number of naturally occurring fibrous silicate minerals that have been mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. The three most common types of asbestos are chrysotile, amosite, and crocidolite.	Chrysotile, also known as white asbestos, is the most common type of asbestos found in buildings. Chrysotile makes up approximately 90 to 95 percent of all asbestos contained in buildings in the United States.	Exposure to asbestos is a health threat; exposure to asbestos fibers may result in health issues such as lung cancer, mesothelioma (a rare cancer of the thin membranes lining the lungs, chest, and abdominal cavity), and asbestosis (a non- cancerous lung disease that causes scarring of the lungs). Exposure to asbestos can occur during demolition or remodeling of buildings that were constructed prior to the 1977 ban on asbestos for use in buildings. Exposure to naturally occurring asbestos can occur during soil-disturbing activities in areas with deposits present.
Hydrogen Sulfide	Hydrogen sulfide is a flammable, colorless, poisonous gas that smells like rotten eggs.	Manure, storage tanks, ponds, anaerobic lagoons, and land application sites are the primary sources of hydrogen sulfide. Anthropogenic sources include the combustion of sulfur containing fuels (oil and coal).	High levels of hydrogen sulfide can cause immediate respiratory arrest. It can irritate the eyes and respiratory tract and cause headache, nausea, vomiting, and cough. Long exposure can cause pulmonary edema.
Sulfates	The sulfate ion is a polyatomic anion with the empirical formula $SO_{\frac{2}{4}}^{\frac{2}{4}}$ Sulfates occur in combination with metal and/or hydrogen ions. Many sulfates are soluble in water.	Sulfates are particulates formed through the photochemical oxidation of sulfur dioxide. In California, the main source of sulfur compounds is combustion of gasoline and diesel fuel.	 (a) Decrease in ventilatory function; (b) aggravation of asthmatic symptoms; (c) aggravation of cardio- pulmonary disease; (d) vegetation damage; (e) degradation of visibility; (f) property damage.
Visibility- reducing Particles	Suspended particulate matter is a mixture of small particles that consist of dry solid fragments, droplets of water, or solid cores with liquid coatings. The particles vary in shape, size, and composition. PM ₁₀ refers to particulate matter that is between 2.5 and 10 microns in diameter (1 micron is one-millionth of a meter). PM _{2.5} refers to particulate matter that is 2.5 microns or less in diameter, about one-thirtieth the size of the average human hair.	Stationary sources include fuel or wood combustion for electrical utilities, residential space heating, and industrial processes; construction and demolition; metals, minerals, and petrochemicals; wood products processing; mills and elevators used in agriculture; erosion from tilled lands; waste disposal; and recycling. Mobile or transportation-related sources are from vehicle exhaust and road dust. Secondary particles form from reactions in the atmosphere.	 Short-term exposure (hours/days): irritation of the eyes, nose, throat; coughing; phlegm; chest tightness; shortness of breath; aggravates existing lung disease, causing asthma attacks and acute bronchitis; those with heart disease can suffer heart attacks and arrhythmias. Long-term exposure: reduced lung function; chronic bronchitis; changes in lung morphology; death.

Toxic Air Contaminant	Physical Description and Properties	Sources	Most Relevant Effects from Pollutant Exposure
Vinyl Chloride	Vinyl chloride, or chloroethene, is a chlorinated hydrocarbon and a colorless gas with a mild, sweet odor. In 1990, CARB identified vinyl chloride as a toxic air contaminant and estimated a cancer unit risk factor.	Most vinyl chloride is used to make polyvinyl chloride plastic and vinyl products, including pipes, wire and cable coatings, and packaging materials. It can be formed when plastics containing these substances are left to decompose in solid waste landfills. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites.	Short-term exposure to high levels of vinyl chloride in the air causes central nervous system effects, such as dizziness, drowsiness, and headaches. Epidemiological studies of occupationally exposed workers have linked vinyl chloride exposure to development of a rare cancer, liver angiosarcoma, and have suggested a relationship between exposure and lung and brain cancers.
Lead	Lead is a solid heavy metal that can exist in air pollution as an aerosol particle component. Leaded gasoline was used in motor vehicles until around 1970. Lead concentrations have not exceeded state or federal standards at any monitoring station since 1982.	Lead ore crushing, lead-ore smelting, and battery manufacturing are currently the largest sources of lead in the atmosphere in the United States. Other sources include dust from soils contaminated with lead-based paint, solid waste disposal, and crustal physical weathering.	Lead accumulates in bones, soft tissue, and blood and can affect the kidneys, liver, and nervous system. It can cause impairment of blood formation and nerve conduction, behavior disorders, mental retardation, neurological impairment, learning deficiencies, and low IQs.

Sources: Bay Air Quality Management District (BAAQMD); California Environmental Protection Agency (Cal/EPA); California Air Resources Board (CARB); United States Environmental Protection Agency (USEPA); National Toxicology Program

Air Quality

Air quality is a function of both the rate and location of pollutant emissions under the influence of meteorological conditions and topographic features. Atmospheric conditions such as wind speed, wind direction, and air temperature inversions interact with the physical features of the landscape to determine the movement and dispersal of air pollutant emissions and, consequently, their effect on air quality.

Regional Air Quality

The Bay Area Air Quality Management District (BAAQMD) is the regional agency with jurisdiction for regulating air quality within the nine-county SFBAAB, which includes Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara counties, the western portion of Solano County, and the southern portion of Sonoma County.

AIR POLLUTANT STANDARDS

Air pollutant standards have been identified by USEPA and CARB for the following six criteria air pollutants that affect ambient air quality: ozone, NO₂, CO, (SO₂, lead, and particulate matter (PM), which is subdivided into two classes based on particle size: PM equal to or less than 10 microns in diameter (PM₁₀), and PM equal to or less than 2.5 microns in diameter (PM_{2.5}). These air pollutants are called "criteria air pollutants," because they are regulated by developing specific public health-and welfare-based criteria as the basis for setting permissible levels. California has also established standards for toxic air contaminants such as visibility-reducing particles, sulfates, hydrogen sulfide,

and vinyl chloride. Table 3.2-3 presents the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for these aforementioned air pollutants. California air quality standards are identical to or stricter than federal standards for all criteria pollutants. It should be noted that there are no State or federal air quality standards for VOCs, benzene, or DPM.

Ambient air pollutant concentrations in the SFBAAB are measured at air quality monitoring stations operated by CARB and BAAQMD. Air quality monitoring stations measure pollutant ground-level concentrations (typically, ten feet above ground level). In general, the SFBAAB experiences low concentrations of most pollutants compared to federal or State standards.

AIR POLLUTANT ATTAINMENT DESIGNATIONS

Both USEPA and CARB use ambient air quality monitoring data to designate areas according to their attainment status for criteria air pollutants. The purpose of these designations is to identify the areas with air quality problems and initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. "Attainment" status refers to those regions that are meeting federal and/or State standards for a specified criteria pollutant. "Nonattainment" refers to regions that do not meet federal and/or State standards for a specified criteria pollutant. "Unclassified" refers to regions where there is not enough data to determine the region's attainment status for a specified criteria air pollutant. Each standard has a different definition, or "form" of what constitutes attainment, based on specific air quality statistics. For example, the federal 8-hour CO standard is not to be exceeded more than once per year; therefore, an area is in attainment of the CO standard if no more than one 8-hour ambient air monitoring values exceeds the threshold per year. In contrast, the federal annual PM_{2.5} standard is met if the three-year average of the annual average PM_{2.5} concentration is less than or equal to the standard.

The current attainment designations for the SFBAAB are also shown in Table 3.2-3. The SFBAAB is designated as nonattainment for the State ozone, PM₁₀, and PM_{2.5} standards, nonattainment for the national ozone and PM_{2.5} standards, and unclassified for the national PM₁₀ standard.

		California	California Standards		National Standards	
Pollutant	Averaging Time	Concentration	Attainment Status	Concentration	Attainment Status	
Ozone	8 Hour	0.070 ppm	Ν	0.070 ppm	Ν	
	1 Hour	0.09 ppm	Ν			
Carbon Monoxide	8 Hour	9.0 ppm	А	9 ppm	А	
	1 Hour	20 ppm	А	35 ppm	А	
Nitrogen Dioxide	1 Hour	0.18 ppm	А	0.100 ppm	U	
	Annual Arithmetic Mean	0.030 ppm		0.053 ppm	А	
Sulfur Dioxide	24 Hour	0.04 ppm	А	0.14 ppm	А	
	1 Hour	0.25 ppm	А	0.075 ppm	А	
	Annual Arithmetic Mean			0.030 ppm	А	
Particulate Matter	Annual Arithmetic Mean	20 μg/m ³	Ν			
(PM ₁₀)	24 Hour	50 μg/m ³	Ν	150 μg/m³	U	
Particulate Matter	Annual Arithmetic Mean	12 μg/m³	Ν	12 μg/m³	U/A	
- Fine (PM _{2.5})	24 Hour			35 μg/m³	Ν	

Table 3.2-3	Federal and State Air Quality Standards and SFBAAB Attainment Status
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		California Standards		National Standards	
Pollutant	Averaging Time	Concentration	Attainment Status	Concentration	Attainment Status
Sulfates	24 Hour	25 μg/m³	А		
Lead	Calendar Quarter			1.5 μg/m³	А
	Rolling 3 Month Average			0.15 μg/m³	
	30 Day Average	1.5 μg/m³)			А
Hydrogen Sulfide	1 Hour	0.03 ppm	U		
Vinyl Chloride (chloroethene)	24 Hour	0.010 ppm	No information available		
Visibility Reducing particles	8 Hour (10:00 to 18:00 PST)		U		

A=Attainment N=Nonattainment U=Unclassified; mg/m³=milligrams per cubic meter ppm=parts per million, µg/m³=micrograms per cubic meter

Source: BAAQMD. 2017. Air Quality Standards and Attainment Status. Last Updated January 5, 2017. https://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status (accessed March 2022).

Local control in air quality management is provided by CARB through county-level or regional (multicounty) air districts. CARB establishes Statewide air quality standards and is responsible for control of mobile emission sources, while the local air districts are responsible for enforcing standards and regulating stationary sources. CARB has established 15 air basins Statewide. The City of Millbrae is located in the SFBAAB, which is under the jurisdiction of BAAQMD.

AIR QUALITY INDEX

The health impacts of the various air pollutants of concern can be presented in a number of ways. The clearest in comparison is to the State and federal ozone standards. If concentrations are below the standard, it is safe to say that no health impact would occur to anyone. When concentrations exceed the standard, impacts will vary based on the amount by which the standard is exceeded. USEPA developed the Air Quality Index (AQI) as an easy-to-understand measure of health impacts compared with concentrations in the air. Table 3.2-4 provides a description of the health impacts of ozone at different concentrations.

Air Quality Index/ 8-hour Ozone Concentration	Health Effects Description
AQI—51–100—Moderate	Sensitive Groups : Children and people with asthma are the groups most at risk.
Concentration 55–70 ppb	Health Effects Statements: Unusually sensitive individuals may experience respiratory symptoms.
	Cautionary Statements : Unusually sensitive people should consider limiting prolonged outdoor exertion.
AQI—101–150—Unhealthy for Sensitive Groups	Sensitive Groups : Children and people with asthma are the groups most at risk.
Concentration 86–105 ppb	Health Effects Statements: Increasing likelihood of respiratory symptoms and breathing discomfort in active children and adults and people with respiratory disease, such as asthma.

Table 3.2-4	Air Quality	Index and Health	Effects from Ozone
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Air Quality Index/ 8-hour Ozone Concentration	Health Effects Description
	Cautionary Statements : Active children and adults, and people with respiratory disease, such as asthma, should limit prolonged outdoor exertion.
AQI—151–200—Unhealthy	Sensitive Groups: Children and people with asthma are the groups most at risk.
Concentration 86–105 ppb	Health Effects Statements: Greater likelihood of respiratory symptoms and breathing difficulty in active children and adults and people with respiratory disease, such as asthma; possible respiratory effects in general population.
	Cautionary Statements : Active children and adults, and people with respiratory disease, such as asthma, should avoid prolonged outdoor exertion; everyone else, especially children, should limit prolonged outdoor exertion.
AQI—201–300—Very Unhealthy	Sensitive Groups: Children and people with asthma are the groups most at risk.
Concentration 106–200 ppb	Health Effects Statements: Increasingly severe symptoms and impaired breathing likely in active children and adults and people with respiratory disease, such as asthma; increasing likelihood of respiratory effects in general population.
	Cautionary Statements : Active children and adults, and people with respiratory disease, such as asthma, should avoid all outdoor exertion; everyone else, especially children, should limit outdoor exertion.

Source: Air Now. AQI Calculator: AQI to Concentration. http://www.airnow.gov/index.cfm?action=re sources.aqi_conc_calculator:

Existing Local (General Plan Area and Specific Plan Area) Air Quality

The Redwood City monitoring station at 897 Barron Avenue is the only monitoring station in San Mateo County and is located 14 miles south of Millbrae. The Redwood City monitoring station measures 8-hour ozone, hourly ozone, PM_{2.5}, and NO₂. For PM₁₀ measurements, data is from the San Francisco-Arkansas Street monitoring street located at 10 Arkansas Street in San Francisco.

Table 3.2-8 summarizes the representative annual air quality data for the General Plan and Specific Plan areas over the years 2018 through 2020 at the Redwood City and San Francisco-Arkansas Street monitoring stations. As shown in Table 3.2-8, the hourly ozone State standard was exceeded in 2020, while the 8-hour federal and State standards were exceeded in both 2019 and 2020. The PM₁₀ State standard was exceeded in 2020. The PM_{2.5} federal standard was exceeded in 2018 and 2020.³

Table 3.2-5 Ambient Air Quality Monitoring Data

Pollutant	2018	2019	2020
Ozone (ppm), Worst 1-Hour ¹	0.077	0.092	0.108
Number of days of State exceedances (>0.09 ppm)	0	0	2
Ozone (ppm), 8-Hour Average ¹	0.061	0.074	0.083
Number of days of State exceedances (>0.07 ppm)	0	2	3
Number of days of Federal exceedances (>0.07 ppm)	0	2	3

³ CARB. 2022c. Top 4 Summary: Select Pollutant, Years, & Area. N.d. https://www.arb.ca.gov/adam/topfour/topfour1.php (accessed March 2022).

Pollutant	2018	2019	2020
Particulate Matter <10 microns, $\mu g/m^3$, Worst 24 Hours ²	43.0	42.1	105.0
Number of days above State standard (>50 $\mu\text{g/m}^3)$	0	0	2
Number of days above Federal standard (>150 $\mu\text{g}/\text{m}^3)$	0	0	0
Particulate Matter <2.5 microns, µg/m ³ , Worst 24 Hours ¹	120.9	29.5	124.1
Number of days above Federal standard (>35 μ g/m ³)	13	0	9

ppm = parts per million; μ g/m³ = micrograms per cubic meter

 $^{1}\,\mathrm{Measurements}$ taken from the Redwood City Monitoring Station

² Measurements taken from the San Francisco-Arkansas Street monitoring station

Source: CARB 2022c

MOBILE EMISSIONS

The primary source of mobile air pollutants (both criteria air pollutant and TACs) in the vicinity of the General Plan and Specific Plan areas is motor-related vehicle trips associated with the local residential, commercial, institutional, and recreational uses.

STATIONARY EMISSIONS

The primary source of stationary air pollutants (both criteria air pollutant and TACs) in the vicinity of the General Plan and Specific Plan areas is building-related energy use associated with the local residential, commercial, school, and recreational uses. Other sources of stationary emissions include landscape maintenance, and consumer products from residential, institutional, and commercial uses. Within the General Plan and Specific Plan area, there are 27 and 10 facilities regulated by the BAAQMD, respectively.⁴

Air Pollution Sensitive Receptors

Sensitive Receptor Types

Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects related to air pollutants exposure than others. Land uses such as residences, schools, day care centers, hospitals, nursing and convalescent homes, and parks are considered to be the most sensitive to poor air quality, because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential receptors, their exposure time is greater than that for other land uses. Therefore, these groups are referred to as sensitive receptors. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 350 days per year, for 70 years. BAAQMD defines sensitive receptors as children, adults, and seniors occupying or residing in residential dwellings, schools, day care centers, hospitals, and senior-care facilities.

Sensitive Receptors in General Plan Area and Specific Plan Area

Air pollution sensitive receptors in the General Plan and Specific Plan areas include single- and multifamily residential land uses, schools, daycares, senior care facilities, and public parks. The

⁴ BAAQMD. 2022. Interactive Data Maps. Last updated June 9. Available at: https://www.baaqmd.gov/about-air-quality/interactive-datamaps

commercial and office land uses throughout the General Plan area are not considered air pollution sensitive receptors.

3.2.3 Regulatory Framework

Federal Regulations

Clean Air Act and National Ambient Air Quality Standards

Congress established much of the basic structure of the Clean Air Act (CAA) in 1970, and made major revisions in 1977 and 1990. Six common air pollutants (also known as criteria pollutants) are addressed in the CAA. These are particulate matter, ground-level ozone, CO, sulfur oxides, nitrogen oxides, and lead. USEPA calls these pollutants criteria air pollutants, because it regulates them by developing human health-based and/or environmentally based criteria (science-based guidelines) for setting permissible levels. The set of limits based on human health are called primary standards. Another set of limits intended to prevent environmental and property damage are called secondary standards. The federal standards are called NAAQS. The air quality standards provide benchmarks for determining whether air quality is healthy at specific locations and whether development activities will cause or contribute to a violation of the standards.

The federal standards were set to protect public health, including that of sensitive individuals; thus, USEPA is tasked with updating the standards as more medical research is available regarding the health effects of the criteria pollutants. Primary federal standards are the levels of air quality necessary, with an adequate margin of safety, to protect the public health.

The Clean Air Act also requires each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP). The federal Clean Air Act Amendments of 1990 added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is periodically modified to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins, as reported by their jurisdictional agencies.

USEPA Emission Standards for New Off-road Equipment

Before 1994, there were no standards to limit the amount of emissions from off-road equipment. In 1994, USEPA established emission standards for hydrocarbons, NOX, CO, and PM to regulate new pieces of off-road equipment. These emission standards came to be known as Tier 1. Since that time, increasingly more stringent Tier 2, Tier 3, and Tier 4 (interim and final) standards were adopted by USEPA, as well as by CARB. Each adopted emission standard was phased in over time. New engines built in and after 2015 across all horsepower sizes must meet Tier 4 final emission standards. In other words, new manufactured engines cannot exceed the emissions established for Tier 4 final emissions standards.

State Regulations

California Air Quality Control Plan (State Implementation Plan)

A State Implementation Plan (SIP) is a document prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain federal standards. The SIP for California is administered by CARB, which has overall responsibility for Statewide air quality maintenance and air pollution prevention. California's SIP incorporates individual federal attainment

plans for regional air districts—an air district prepares their federal attainment plan, which is sent to CARB to be approved and incorporated into the California SIP. Federal attainment plans include the technical foundation for understanding air quality (e.g., emission inventories and air quality monitoring), control measures and strategies, and enforcement mechanisms.

Areas designated nonattainment must develop air quality plans and regulations to achieve standards by specified dates, depending on the severity of the exceedances. For much of the country, implementation of federal motor vehicle standards and compliance with federal permitting requirements for industrial sources are adequate to attain air quality standards on schedule. For many areas of California, however, additional State and local regulation is required to achieve the standards.

California Clean Air Act and California Ambient Air Quality Standards

The California CAA, signed into law in 1988, requires all areas of the State to make incremental progress toward the achievement of the California Ambient Air Quality Standards (CAAQS) . CARB is the State air pollution control agency and is a part of CalEPA. CARB is the agency responsible for coordination and oversight of State and local air pollution control programs in California, and for implementing the requirements of the California CAA. CARB overseas local district compliance with federal and California laws, approves local air quality plans, submits the State implementation plans to the USEPA, monitors air quality, determines and updates State area designations and maps, and sets emissions standards for new mobile sources and off-road vehicles pursuant to California waiver and authorization requests, consumer products, small utility engines, and fuels.

The California CAA requires CARB to establish ambient air quality standards for California, known as CAAQS. Similar to the NAAQS, CAAQS have been established for criteria pollutants and standards are established for vinyl chloride, hydrogen sulfide, sulfates, and visibility-reducing particulates. In general, the CAAQS are more stringent than the NAAQS on criteria pollutants. The California CAA requires all local air districts to endeavor to make incremental progress toward attaining the CAAQS. The California CAA specifies that local air districts focus attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources as long as the regulations do not infringe on local land use authority.

In 2017, CARB released a technical advisory on reducing air pollution exposure from near highvolume roadways that is a technical supplement to CARB's air quality and Land Use Handbook: A Community Health Perspective. Since the publication of the handbook, research has demonstrated the public health, climate, financial and other benefits of compact, infill development along transportation corridors, and that exposures can be reduced with new strategies. As described in the technical advisory, California has implemented various measures to improve air quality and reduce exposure to traffic emissions. These include the Diesel Risk Reduction Plan, which aims to reduce particulate matter emissions from diesel vehicles. The continued electrification of California's vehicle fleet would also reduce PM_{2.5} levels, and ongoing efforts to reduce emissions from cars and trucks and to move vehicles towards "zero emission" alternatives will continue to drive down traffic pollution (CARB 2017).

California Health and Safety Code Section 39655 and California Code of Regulations Title 17 Section 93000 (Substances Identified as Toxic Air Contaminants)

CARB identifies substances as TACs as defined in Health and Safety Code Section 39655 and listed in Title 17, Section 93000 of the California Code of Regulations, "Substances Identified as Toxic Air Contaminants." A TAC is defined as an air pollutant that may cause or contribute to an increase in

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mortality or serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations. In general, for those TACs that may cause cancer, there are thresholds set by regulatory agencies below which adverse health impacts are not expected to occur. This contrasts with the criteria pollutants for which acceptable levels of exposure can be determined and for which the state and federal governments have set ambient air quality standards. According to the California Almanac of Emissions and Air Quality, the majority of the estimated health risk from TACs for the State of California can be attributed to relatively few compounds, the most important of which is DPM from diesel-fueled engines.

California Low-emission Vehicle Program

CARB first adopted Low-Emission Vehicle (LEV) program standards in 1990. These first LEV standards ran from 1994 through 2003. LEV II regulations, running from 2004 through 2010, represent continuing progress in emission reductions. As the State's passenger vehicle fleet continues to grow and more sport utility vehicles and pickup trucks are used as passenger cars rather than work vehicles, the more stringent LEV II standards were adopted to provide reductions necessary for California to meet federally mandated clean air goals outlined in the 1994 State Implementation Plan. In 2012, CARB adopted the LEV III amendments to California's LEV regulations. These amendments, also known as the Advanced Clean Car Program, include more stringent emission standards for model years 2017 through 2025 for both criteria pollutants and greenhouse gas (GHG) emissions for new passenger vehicles.

California On-Road Heavy-duty Vehicle Program

CARB has adopted standards for emissions from various types of new on-road heavy-duty vehicles. Section 1956.8, Title 13, California Code of Regulations contains California's emission standards for on-road heavy-duty engines and vehicles, and test procedures. CARB has also adopted programs to reduce emissions from in-use heavy-duty vehicles including the Heavy-Duty Diesel Vehicle Idling Reduction Program, the Heavy-Duty Diesel In-Use Compliance Program, the Public Bus Fleet Rule and Engine Standards, and the School Bus Program and others.

California Airborne Toxics Control Measure for Asbestos

CARB has adopted Airborne Toxics Control Measures for sources that emit a particular TAC. If there is a safe threshold for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If there is no safe threshold, the measure must incorporate Best Available Control Technology to minimize emissions. In July 2001, CARB approved an Air Toxic Control Measure for construction, grading, quarrying and surface mining operations to minimize emissions of naturally occurring asbestos. The regulation requires application of best management practices (BMPs) to control fugitive dust in areas known to have naturally occurring asbestos and requires notification to the local air district prior to commencement of ground-disturbing activities. The measure establishes specific testing, notification and engineering controls prior to grading, quarrying, or surface mining in construction zones where naturally occurring asbestos is located on projects of any size. There are additional notification and engineering controls at work sites larger than one acre in size. These projects require the submittal of a "Dust Mitigation Plan" and approval by the air district prior to the start of a project.

Construction sometimes requires the demolition of existing buildings where construction occurs. Buildings often include materials containing asbestos, and the Residential Project involves the demolition of existing buildings (the existing library and the existing vacant administrative offices) totaling approximately 79,447 square feet.⁵ Asbestos is also found in a natural state, known as naturally occurring asbestos. Exposure and disturbance of rock and soil that naturally contain asbestos can result in the release of fibers into the air and consequent exposure to the public. Asbestos most commonly occurs in ultramafic rock that has undergone partial or complete alteration to serpentine rock (serpentinite) and often contains chrysotile asbestos. In addition, another form of asbestos, tremolite, can be found associated with ultramafic rock, particularly near faults. Sources of asbestos emissions include unpaved roads or driveways surfaced with ultramafic rock, construction activities in ultramafic rock deposits, or rock quarrying activities where ultramafic rock is present.

Verified Diesel Emission Control Strategies

USEPA and CARB tiered off-road emission standards only apply to new engines and off-road equipment can last several years. CARB has developed Verified Diesel Emission Control Strategies (VDECS), which are devices, systems, or strategies used to achieve the highest level of pollution control from existing off-road vehicles, to help reduce emissions from existing engines. VDECS are designed primarily for the reduction of diesel PM emissions and have been verified by CARB. There are three levels of VDECS, the most effective of which is the Level 3 VDECS. Tier 4 engines are not required to install VDECS because they already meet the emissions standards for lower tiered equipment with installed controls.

California Diesel Risk Reduction Plan

CARB Diesel Risk Reduction Plan has led to the adoption of new state regulatory standards for all new on-road, off-road, and stationary diesel-fueled engines and vehicles to reduce DPM emissions by about 90 percent overall from year 2000 levels. The projected emission benefits associated with the full implementation of this plan, including federal measures, are reductions in DPM emissions and associated cancer risks of 75 percent by 2010, and 85 percent by 2020.

Tanner Air Toxics Act and Air Toxics Hot Spots Information and Assessment Act

TACs in California are primarily regulated through the Tanner Air Toxics Act (AB 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588), also known as the Hot Spots Act. To date, CARB has identified more than 21 TACs and has adopted the USEPA list of HAPs as TACs.

Carl Moyer Memorial Air Quality Standards Attainment Program

The Carl Moyer Memorial Air Quality Standards Attainment Program (Carl Moyer Program), a partnership between CARB and local air districts, issues grants to replace or retrofit older engines and equipment with engines and equipment that exceed current regulatory requirements to reduce air pollution. Money collected through the Carl Moyer Program complements California's regulatory program by providing incentives to effect early or extra emission reductions, especially from emission sources in environmental justice communities and areas disproportionately affected by air pollution. The program has established guidelines and criteria for the funding of emissions reduction projects. Within the SFBAAB, the BAAQMD administers the Carl Moyer Program. The program

⁵ For purposes of estimating emissions, it was assumed that buildings totaling 79,457 square feet would be demolished.

establishes cost-effectiveness criteria for funding emission reductions projects, which under the final 2017 Carl Moyer Program Guidelines are \$30,000 per weighted ton of NO_x, ROG, and PM.

Regional and Local Regulations

Bay Area Clean Air Plan

The BAAQMD is responsible for assuring that the federal and state ambient air quality standards are attained and maintained in the Bay Area. BAAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, as well as many other activities.

BAAQMD adopted the *Bay Area Clean Air Plan: Spare the Air, Cool the Climate (Bay Area Clean Air Plan)* on April 19, 2017 as an update to the 2010 Clean Air Plan. The 2017 Clean Air Plan, which focuses on protecting public health and the climate, defines an integrated, multi-pollutant control strategy that includes feasible measures to reduce emissions for four categories: ground-level ozone and its precursors, ROG and NO_x; PM (primarily PM_{2.5}, and precursors to secondary PM_{2.5}); TACs, and greenhouse gas emissions. The control measures are categorized based on the economic sector framework and include stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, and water. To protect public health, the control strategy will decrease population exposure to PM and TACs in communities that are most impacted by air pollution with the goal of eliminating disparities in exposure to air pollution between communities. The control strategy will also protect the climate by reducing greenhouse gas emissions and developing a long-range vision of how the Bay Area could look and function in a year 2050 post-carbon economy.

BAAQMD Particulate Matter Plan

To fulfill federal air quality planning requirements, BAAQMD adopted a PM_{2.5} emissions inventory for year 2010 at a public hearing on November 7, 2012. The Bay Area Clean Air Plan also included several measures for reducing PM emissions from stationary sources and wood burning. On January 9, 2013, USEPA issued a final rule determining that the Bay Area has attained the 24-hour PM_{2.5} NAAQS, suspending federal SIP planning requirements for the SFBAAB. Despite this USEPA action, the SFBAAB will continue to be designated as nonattainment for the national 24-hour PM_{2.5} standard until BAAQMD submits a redesignation request and a maintenance plan to USEPA, and USEPA approves the proposed redesignation.

The SFBAAB is in nonattainment for the federal PM_{10} and federal $PM_{2.5}$ standards. USEPA lowered the 24-hour $PM_{2.5}$ standard from 65 micrograms per cubic meter ($\mu g/m^3$) to 35 $\mu g/m^3$ in 2006, and designated the Air Basin as nonattainment for the new $PM_{2.5}$ standard effective December 14, 2009.

On December 8, 2011, CARB submitted a "clean data finding" request to USEPA on behalf of the Bay Area. If the clean data finding request is approved, then USEPA guidelines provide that the region can fulfill federal PM_{2.5} SIP requirements by preparing either a redesignation request and a PM_{2.5} maintenance plan, or a "clean data" SIP submittal. Because peak PM_{2.5} levels can vary from year to year based on natural, short-term changes in weather conditions, the BAAQMD believes that it would be premature to submit a redesignation request and PM_{2.5} maintenance plan at this time. Therefore, BAAQMD will prepare a "clean data" SIP to address the required elements, including:

- An emission inventory for primary PM_{2.5}, as well as precursors to secondary PM formation; and
- Amendments to the BAAQMD's New Source Review regulation to address PM_{2.5}.

BAAQMD Regulations

REGULATION 2, RULE 5 (NEW SOURCE REVIEW PERMITTING)

The BAAQMD regulates backup emergency generators, fire pumps, and other sources of TACs through its New Source Review (Regulation 2, Rule 5) permitting process. Although emergency generators are intended to be used only during periods of power outages, monthly testing of each generator is required; however, the BAAQMD limits testing to no more than 50 hours per year. Each emergency generator installed is assumed to meet a minimum of Tier 2 emission standards (before control measures). As part of the permitting process, the BAAQMD limits the excess cancer risk from any facility to no more than 10 per 1-million-population for any permits that are applied for within a 2-year period and would require any source that would result in an excess cancer risk greater than 1 per 1 million to install Best Available Control Technology for Toxics.

REGULATION 8, RULE 3 (ARCHITECTURAL COATINGS)

This rule governs the manufacture, distribution, and sale of architectural coatings and limits the reactive organic gases content in paints and paint solvents. Although this rule does not directly apply to the proposed plan, it does dictate the ROG content of paint available for use during the construction.

REGULATION 8, RULE 15 (EMULSIFIED AND LIQUID ASPHALTS)

Although this rule does not directly apply to the proposed plan, it does dictate the reactive organic gases content of asphalt available for use during the construction through regulating the sale and use of asphalt and limits the ROG content in asphalt.

REGULATION 1, RULE 301 (ODOROUS EMISSIONS)

BAAQMD enforces odor control by helping the public to document a public nuisance. Upon receipt of a complaint, BAAQMD sends an investigator to interview the complainant and to locate the odor source if possible. BAAQMD typically brings a public nuisance court action when there are a substantial number of confirmed odor events within a 24-hour period. An odor source with five or more confirmed complaints per year averaged over 3 years is considered to have a substantial effect on receptors. Several BAAQMD regulations and rules apply to odorous emissions. Regulation 1, Rule 301 is the nuisance provision that states that sources cannot emit air contaminants that cause nuisance to a number of persons. Regulation 7 specifies limits for the discharge of odorous substances where BAAQMD receives complaints from 10 or more complainants within a 90-day period. Among other things, Regulation 7 precludes discharge of an odorous substance that causes the ambient air at or beyond the property line to be odorous after dilution with 4 parts of odor-free air, and specifies maximum limits on the emission of certain odorous compounds.

Plan Bay Area

In October 2021, the Metropolitan Transportation Commission (MTC) approved Plan Bay Area 2050. Plan Bay Area includes integrated land use and transportation strategies for the region and was developed through OneBayArea, a joint initiative between ABAG, BAAQMD, MTC, and the San Francisco Bay Conservation and Development Commission. Plan Bay Area is also considered the Association of Bay Area Governments (ABAG)/MTC Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). In accordance with SB 743, Plan Bay Area included elements designed to encourage the type of land-use development to meet three primary objectives. First, Roadway Level of Service (LOS) could not be considered an environmental impact under the California Environmental Quality Act (CEQA). Second, it introduced changes to Vehicle Miles Traveled (VMT) per capita as a determinant of environmental impact. Third, the use of VMT as an environmental impact in CEQA is considered a mechanism for achieving State and regional GHG reduction goals. As a regional land use plan, Plan Bay Area aims to reduce per-capita GHG emissions through the promotion of more compact, mixed-use residential and commercial neighborhoods located near transit.

Millbrae General Plan

The current Millbrae General Plan contains policies related to air quality, but they would be replaced by the proposed 2040 General Plan.

3.2.4 Impacts and Mitigation Measures

Significance Criteria

The City of Millbrae utilizes the following 2022 CEQA Guidelines Appendix G significance criteria questions related to Air Quality.

Would the 2040 General Plan or Specific Plan:

- a) Conflict with or obstruct implementation of the applicable air quality plan?
- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?
- c) Expose sensitive receptors to substantial pollutant concentrations?
- d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Approach to Analysis

This analysis uses the BAAQMD May 2017 CEQA Air Quality Guidelines to evaluate air quality.

Construction Criteria Pollutant and TAC Emissions

Construction-related emissions are limited in duration but may still cause adverse air quality impacts. Construction associated with implementation of the proposed plans would generate emissions from three primary sources: the operation of construction vehicles (e.g., scrapers, loaders, dump trucks, etc.); ground disturbance during site preparation and grading, which creates fugitive dust; and the application of asphalt, paint, or other oil-based substances.

At this time, the pace, location and duration associated with constructing projects permitted by the project are not sufficiently detailed to quantify a specific emission impact, and thus it would be speculative to do so. Rather, construction criteria pollutant and TAC emissions impacts for the 2040 General Plan and Specific Plan are discussed qualitatively pursuant to the four significance criteria identified above.

Operation Criteria Pollutant and TAC Emissions

Based on plan-level guidance from the BAAQMD 2017 *CEQA Air Quality Guidelines,* long-term operational criteria pollutant and TAC emissions associated with implementation of the proposed plans are discussed qualitatively by comparing the proposed project to the 2017 Clean Air Plan goals, policies, and control measures. In addition, comparing the rate of increase of plan VMT and population is recommended by BAAQMD for determining significance of criteria pollutants. If the proposed plans do not meet either criterion, then impacts would be potentially significant.

Odors

The impact analysis qualitatively evaluates the types of land uses facilitated by the proposed plans to evaluate whether major sources of anticipated odors would be present and, if so, whether those sources would likely generate objectionable odors. According to the BAAQMD CEQA Air Quality Guidelines, the project-level threshold for odor sources is if they result in five confirmed complaints per year averaged over three years within the screening distance shown in Table 3.2-6; the plan-level threshold states to Identify the location, and include policies to reduce the impacts, of existing or planned sources of odors.

Land Use/Type of Operation	Plan Areas Screening Distance
Wastewater Treatment Plant	2 miles
Wastewater Pumping Facilities	1 mile
Sanitary Landfill	2 miles
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	2 miles
Chemical Manufacturing	2 miles
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Rendering Plant	2 miles
Coffee Roaster	1 mile
Food Processing Facility	1 mile
Confined Animal Facility/Feed Lot/Dairy	1 mile
Green Waste and Recycling Operations	1 mile
Metal Smelting Plants	2 miles
Source: BAAQMD 2017	

EIR Scoping Comments Consideration

No comments relevant to CEQA were received in response to the EIR NOP specific to air quality that need to be addressed in the impacts discussion.

Specific Thresholds of Significance

Consistency with Air Quality Plan

The applicable air quality plan is the BAAQMD 2017 Bay Area Clean Air Plan, which identifies measures to:

- Reduce emissions and reduce ambient concentrations of air pollutants; and
- Safeguard public health by reducing exposure to the air pollutants that pose the greatest health risk, with an emphasis on protecting the communities most heavily affected by air pollution.

The proposed plans would be consistent with the Bay Area Clean Air Plan if it would support the Clean Air Plan goals, include applicable control measures, and not disrupt or hinder implementation of Clean Air Plan control. Consistency with the Clean Air Plan is the basis for determining whether the proposed plans would conflict with or obstruct implementation of an applicable air quality plan.

Construction Criteria Pollutant and TAC Emissions Thresholds

BAAQMD's May 2017 *CEQA Air Quality Guidelines* have no plan-level significance thresholds for construction air pollutants emissions. However, they do include the individual project-level thresholds for construction-related and long-term operational emissions of air pollutants. These thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAAB's existing air quality conditions. Construction emissions associated with plan implementation are discussed qualitatively to evaluate potential air quality impacts.

For health risks associated with TAC and PM_{2.5} emissions, the BAAQMD May 2017 *CEQA Air Quality Guidelines* state a project would result in a significant impact if the any of the following thresholds are exceeded:

- Non-compliance with Qualified Community Risk Reduction Plan;
- Increased cancer risk of > 10.0 in a million;
- Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute); or
- Ambient PM_{2.5} increase of > 0.3 μg/m³ annual average

In addition, a project would have a cumulatively considerably impact associated with health risks from TAC and PM_{2.5} emissions if the aggregate total emissions of all past, present, and foreseeable future sources within a 1,000-foot radius of the fenceline of the source plus the project's contribution exceed any of the following thresholds:

- Non-compliance with Qualified Community Risk Reduction Plan;
- Increased cancer risk of > 100.0 in a million;
- Increased non-cancer risk of > 10.0 Hazard Index (Chronic or Acute); or
- Ambient PM_{2.5} increase of > 0.8 μg/m³ annual average

Operational Criteria Pollutant and TAC Emissions Thresholds

BAAQMD's 2017 *CEQA Air Quality Guidelines* contain specific operational plan-level significance thresholds for criteria air pollutants. Plans must show the following over the planning period:

Consistency with current air quality plan control measures

 VMT or vehicle trips (VT) increase is less than or equal to the plan's projected population increase

If a plan can demonstrate consistency with both of these criteria, then impacts are considered less than significant.

The same thresholds listed above for construction health risks from TAC and $PM_{2.5}$ would apply to operation.

Odors

The significance thresholds for odor impacts are qualitative in nature. Specifically, an odorgenerating source with five or more confirmed complaints in the new source area per year averaged over three years is considered to have a significant impact on receptors within the screening distances shown above under Approach to Analysis.

Impact Evaluation

Air Quality Management Plans Consistency

Significance Criterion a: Would the proposed plans conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1 IMPLEMENTATION OF THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD BE CONSISTENT WITH THE BAAQMD'S 2017 CLEAN AIR PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction and Operation

2040 GENERAL PLAN

The most recently adopted air quality plan in the SFBAAB is the 2017 Clean Air Plan.⁶ The 2017 Clean Air Plan is a roadmap showing how the San Francisco Bay Area will achieve compliance with the State one-hour ozone standard as expeditiously as practicable, and how the region will reduce transport of ozone and ozone precursors to neighboring air basins. The 2017 Clean Air Plan does not include control measures that apply directly to construction and operation of individual development projects. Instead, the control strategy includes stationary-source control measures to be implemented through the BAAQMD regulations; mobile-source control measures to be implemented through incentive programs and other activities; and transportation control measures to be implemented through transportation programs in cooperation with the Metropolitan Transportation Commission (MTC), local governments, transit agencies, and others. The 2017 Clean Air Plan also represents the Bay Area's most recent triennial assessment of the region's strategy to attain the state one-hour ozone standard. In this, the 2017 Clean Air Plan replaces the 2010 Clean Air Plan. Under BAAQMD's methodology, a determination of consistency with *CEQA Guidelines* thresholds should demonstrate that a project:

- Supports the primary goals of the 2017 Clean Air Plan;
- Includes applicable control measures from the 2017 Clean Air Plan; and

⁶ BAAQMD. 2017c. Spare the Air Cool the Climate Final 2017 Clean Air Plan. April. https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en (accessed March 2022).

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Does not disrupt or hinder implementation of any 2017 Clean Air Plan control measures.

The following includes a discussion of consistency with these criteria for the 2040 General Plan. The 2017 Clean Air Plan contains 85 control strategies aimed at reducing air pollution and protecting the climate in the Bay Area. For consistency with climate planning efforts at the State level, the control strategies in the 2017 Clean Air Plan are based on the same economic sector framework used by CARB, which encompass stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Table 3.2-7 identifies applicable control measures, discusses 2040 General Plan consistency, and shows corresponding policies from the 2040 General Plan that address the measures.

Table 3.2-7	Clean Air Plan Control Measures Consistency Analysis – 2040 General Plan
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Control Measures	Consistency
Transportation	
TR2: Trip Reduction Programs. Implement the regional Commuter Benefits Program (Rule 14-1) that requires employers with 50 or more Bay Area employees to provide commuter benefits. Encourage trip reduction policies and programs in local plans, e.g., general and specific plans, while providing grants to support trip reduction efforts. Encourage local governments to require mitigation of vehicle travel as part of new development approval, to adopt transit benefits ordinances in order to reduce transit costs to employees, and to develop innovative ways to encourage rideshare, transit, cycling, and walking for work trips. Fund various employer-based trip reduction programs.	 Consistent: Buildout of the 2040 General Plan would promote compatible land uses resulting in City residents living and working in closer proximity to each other. Proposed policies such as LU-2.3 emphasize housing near jobs in the City, which would have the effect of promoting land use decisions that would result in a reduction of commuter VMT Policy LU-2.3: Housing Near Jobs. The City shall support opportunities that enable people to live close to job locations.
 TR3: Local and Regional Bus Service. Fund local and regional bus projects, including operations and maintenance. TR4: Local and Regional Rail Service. Fund local and regional rail service projects, including operations and maintenance. 	 Consistent. Proposed Goal M-2 of the Mobility Element focuses on providing efficient, convenient, and accessible public transit system for residents, workers, and visitors in Millbrae. In particular, the following policies would encourage improved transit access and regional transit connections in Millbrae: Policy M-2.1: Caltrain and BART. The City shall coordinate with Caltrain and BART to assure the Millbrae Station is well-maintained, has adequate parking, a safe environment, and continues to provide high-quality service. Policy M-2.2: California High Speed Rail. The City shall continue to work with and strongly advocate that the California High-Speed Rail Authority plan a high-quality, well-designed Millbrae-SFO Station that enhances access and services and fully integrates all transit modes serving the Station into a single station and is also coordinated and interconnected with the surrounding environment including development projects. The City will continue to request that a variety of alternatives are considered, including alternatives that provide the least impact on the community. Policy M-2.3: Bus and Shuttle Service. The City shall work with SamTrans, other agencies, private companies, and organizations to provide and manage appropriate community-serving transit service and coordination of schedules and services with other transit

Control Measures	Consistency
	agencies. Shuttle service should focus on connecting transit, hotels, and employment centers with the City's Downtown
TR6: Freeway and Arterial Operations. Improve the performance and efficiency of freeway and arterial systems through operational improvements, such as implementing the Freeway Performance Initiative, the Freeway Service Patrol and the Arterial Management Program.	Consistent. Proposed Policy M-6.2 in the Mobility Element calls for the City shall encourage regional agencies to provide adequate funding for local roadway and transit improvements through sales tax initiatives, traffic impact fees, and other measures when necessary. Proposed Policy M-6.4 states that the City shall support all appropriate measures necessary to improve regional traffic on U.S. 101, Interstate 280, and El Camino Real (State Route 82) as related to traffic conditions in Millbrae.
TR9: Bicycle and Pedestrian Access and Facilities. Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.	 Consistent: Proposed policies in the 2040 General Plan would support an efficient and safe bicycle and pedestrian system that would improve the connectivity and accessibility throughout the city. Goal M-3 from the Mobility Element is focused on providing a robust and interconnected bicycle and pedestrian circulation system throughout the city that promotes healthy lifestyles and is a viable alternative to automobile use. To support this goal are 12 different policies intended to provide more bikeway access, bicycle facilities, bike parking, and shared modes of active transportation to encourage the use of bicycles and avoid vehicle trips. Proposed policies from the Mobility Element listed below would encourage bicycle and pedestrian facilities: Policy M-3.1: Active Transportation Plan. The City shall maintain and implement the Active Transportation Plan to enhance the city's bicycle and pedestrian network. Policy M-3.2: Trail Access. The City shall enhance the system of pathways providing access to the Spur Trail, the Bay Trail, the Bay Area Ridge Trail, the Crystal Springs Regional Trail, and closing gaps in the trail system. Policy M-3.3: Bay Trail. The City shall support the completion of the Bay Trail in coordination with regional agencies, and the selection of the trail route and implementation of the trail system in an appropriate alignment between Millbrae and South San Francisco. Policy M-3.5: Bicycle Lanes on El Camino Real. The City shall explore options for providing separated or buffered bicycle lanes along El Camino Real node eveloping parallel alternative routes to the El Camino Real node to provide for connectivity for bicyclists of all ages and abilities, consistent with the Active Transportation Plan. Policy M-3.5: Bicycle Lanes on El Camino Real. The City shall explore options for providing separated or buffered bicycle lanes along El Camino Real noute to provide for connectivity for bicyclists of all ages and abilit

Control Measures	Consistency
	 pedestrian facilities approved by the Community Development Department, adjacent to the project site. Improvements could include secure bicycle parking, streetlights, street furniture, landscaping, trash receptacles, pedestrian-scaled lighting fixtures, shade, and public art. Policy M-3.8: Pedestrian Safety at Intersections. The City shall implement the Active Transportation Plan to enhance pedestrian safety with pedestrian countdown displays at signalized intersections, signal timing that minimizes pedestrian wait times and provides adequate crossing times, crosswalks at all approaches, continental and other high-visibility crosswalk striping, corner curb extensions, and perpendicular ADA-standard curb cuts on all corners. Policy M-3.9: Sidewalk Width. The City shall implement the Downtown and El Camino Real Specific Plan to expand the sidewalk widths along Broadway and El Camino Real to accommodate outdoor dining, sidewalk furniture, and better pedestrian access to create a more inviting atmosphere. Policy M-3.10: Safe Routes to Schools. The City shall coordinate with the school district and parent organizations to support facility construction and new programs, including seeking State and Federal funds, to ensure that Millbrae children can walk or bike to school safely. Policy M-3.11: Shared Electric Bikes and Scooters. The City shall designate locations for mobility hubs and modify existing city infrastructure to accommodate shared bicycles, electric bikes and scooters that provide last-mile solutions to residents and commuters. Infrastructure enhancements include dedicated off-street parking spaces and on-street corrals to accommodate shared electric bike and scooter parking and prevent conflicts with pedestrians.
TR13: Parking Policies. Encourage parking policies and programs in local plans, e.g., reduce minimum parking requirements; limit the supply of off-street parking in transit- oriented areas; unbundle the price of parking spaces; support implementation of demand- based pricing (such as "SF Park") in high-traffic areas.	 Consistent: Proposed Goal M-4 of the Mobility Element is intended to ensure an adequate supply of parking that provides safe and efficient circulation is developed. The City proposes policies that recognize that parking should be balanced with other objectives that encourage transit use, bicycling, and walking. The following policies that support this goal and are relevant to TR13 are included below: Policy M-4.1: Parking Management Plan. The City shall prepare and implement a parking management plan for the specific plan areas that considers the use of all available tools, including parking enforcement, to address parking issues within the plan areas. Policy M-4.2: Reduce Parking Encroachment into Neighborhoods. The City shall continue to explore new methods to prevent or reduce parking encroachment from commercial areas into existing neighborhoods, including residential parking permit programs. Policy M-4.3. Downtown Parking Supply Management. The City shall consider active parking management to expand downtown parking supply, including, parking reservation systems, wayfinding, digital real-time parking availability signs, priced parking, and potential parking structures and partnerships with new developments to provide parking available to the public. Policy M-4.4: Parallel Parking on Broadway The City shall consider implementing parallel parking on Broadway (consistent with the recommendations of the Downtown and El Camino Real Specific Plan)

implementing parallel parking on Broadway (consistent with the recommendations of the Downtown and El Camino Real Specific Plan) to allow for increased sidewalk widths, subject to further study of parking provisions for adjacent businesses.

Consistency

Policy M-4.5: Shared Use of the Millbrae Station Parking Facilities. The City shall work with Caltrain and BART to support the shared use of the Millbrae Station parking facilities for use during off-peak periods, such as visitors who are dining and shopping in Millbrae during evening hours and on weekends.

Policy M-4.7: Flexible Parking Structures. The City shall encourage new parking structures to be designed with the flexibility to evolve into another use that can accommodate infill development and reuse, if parking demand decreases or can be fulfilled using other nearby facilities.

Energy

EN1: Decarbonize Electricity Production.

Engage with PG&E, municipal electric utilities and CCEs to maximize the amount of renewable energy contributing to the production of electricity within the Bay Area as well as electricity imported into the region. Work with local governments to implement local renewable energy programs. Engage with stakeholders including dairy farms, forest managers, water treatment facilities, food processors, public works agencies and waste management to increase use of biomass in electricity production.

EN2: Decrease Electricity Demand. Work with local governments to adopt additional energy-efficiency policies and programs. Support local government energy efficiency program via best practices, model ordinances, and technical support. Work with partners to develop messaging to decrease electricity demand during peak times.

Consistent. The focus of the Natural Resource Conservation Element of the 2040 General Plan is to encourage energy efficiency and renewable energy sources to create a sustainable environment. Relevant policies are as follows:

Policy NRC-5.3: Zero Net Energy Building. The City shall support opportunities to achieve zero net energy use for new buildings or the retrofitting of existing buildings in accordance with State laws and encourage existing buildings to achieve energy efficiencies. Policy NRC-5.4: Renewable Energy Sourcing and Storage. The City shall encourage and support the generation, transmission, use, and storage of renewable energy and continue its participation and support for Peninsula Clean Energy.

Consistent: Goals and policies proposed in the 2040 General Plan would support the City's efforts to conserve various resources that would translate to energy conservation, such as improving water and power conservation. Overarching sustainability strategies to decrease energy demand include encouraging incorporation of green building features contained in the California Green Building Standards Code (CALGreen), Part 11, Title 24, encouraging energy-efficient infrastructure, and design developments with water efficient landscaping. The following General Plan policies would reduce energy demand in the City:

Policy HSHM-3.6. Sustainable Building and Site Design Practices. The City shall require new development to employ sustainable building and site design practices, consistent with California Green Building Standards Code (CALGreen) and the City of Millbrae Municipal Code Title 9 Buildings and Fire Regulations, Chapter 9.50 Energy Code and Chapter 9.35 Green Building Code including requirements for sustainable reach standards.

Policy NRC-5.1: Energy Efficient Practices and Operations. The City shall promote the efficient energy use in the design, construction, maintenance, and operation of public and private facilities, infrastructure, and equipment.

Policy NRC-5.3: Zero Net Energy Building. The City shall support opportunities to achieve zero net energy use for new buildings or the retrofitting of existing buildings in accordance with State laws and encourage existing buildings to achieve energy efficiencies. Policy NRC-5.4: Renewable Energy Sourcing and Storage. The City shall encourage and support the generation, transmission, use, and storage of renewable energy and continue its participation and support for Peninsula Clean Energy.

Control Measures	Consistency
	 Policy NRC-5.6: Green Building Ordinance. The City shall adopt and apply the most recent Green Building Standards Code (CALGreen) to new municipal, commercial, and residential structures, remodels, and additions. The City shall also consider updates for additional "reach code" mandatory requirements for new development, such as solar hot water systems or cool roofs. Policy NRC-5.7: Energy Efficient Municipal Buildings. The City shall consider CALGreen Tier 1 energy performance, along with LEED Silver or Gold equivalent status for new municipal buildings to maximize energy efficiency. Policy NRC-5.8: Energy Efficiency Education. The City shall continue to work with energy utilities and regional partners to educate residents and business owners about renewable energy and energy efficiency, including available programs and incentives, and strategies to help residents and business owners reduce their energy demand and energy-related GHG emissions. Policy NRC-5.9: Energy Retrofit Incentives and Rebates. The City shall promote participation in residential and commercial energy efficiency programs, including BayREN's programs, San Mateo County Energy Watch and PG&E's or Peninsula Clean Energy's efficient appliance rebates. Policy NRC-5.10: Energy Audits. The City shall encourage residential and commercial energy audits.
Buildings	
BL1: Green Buildings . Collaborate with partners such as KyotoUSA to identify energy- related improvements and opportunities for on-site renewable energy systems in school districts; investigate funding strategies to implement upgrades. Identify barriers to effective local implementation of the CALGreen (Title 24) statewide building energy code; develop solutions to improve implementation/enforcement. Work with ABAG's BayREN program to make additional funding available for energy-related projects in the buildings sector. Engage with additional partners to target reducing emissions from specific types of buildings.	Consistent : Implementation of the proposed 2040 General Plan policies listed under control measure EN2 would promote green building standards. In addition, future development envisioned under the 2040 General Plan would be required to comply with all energy standards of Title 24 that are in effect at the time of development.
BL2: Decarbonize Buildings. Explore potential Air District rulemaking options regarding the sale of fossil fuel-based space and water heating systems for both residential and commercial use. Explore incentives for property owners to replace their furnace, water heater or natural-gas powered appliances with zero-carbon alternatives. Update Air District guidance documents to recommend that commercial and multi-family developments install ground source heat pumps and solar hot water heaters.	Consistent. As described in the proposed Natural Resource Conservation Element, Policy NRC-5.3 states that the City shall support opportunities for zero net energy use in new buildings or retrofitted existing buildings

Control Measures	Consistency
Waste Management Control Measures	
WA4: Recycling and Waste Reduction. Develop or identify and promote model ordinances on community-wide zero waste goals and recycling of construction and demolition materials in commercial and public construction projects	 Consistent. Proposed Goal NRC-67 in the Natural Resource Conservation Element includes specific policies to reduce the generation of solid waste and improve recycling capabilities. Policies include: Policy NRC-6.1: Solid Waste Diversion and Recycling. The City shall encourage increased community participation in recyclables and organic waste to achieve set diversion goals consistent with governing law. Policy NRC-6.2: Construction and Demolition Waste. The City shall continue to require all developments to comply with the current CALGreen requirements for construction and demolition waste diversion. Policy NRC-6.3: Integrated Waste Management. The City shall continue to implement the AB 939 Integrated Waste Management Plan to meet the waste diversion requirements of the California Integrated Waste Management Act (AB 939) and related legislation. Policy NRC-6.4: Sustainable Purchasing Policy. The City shall prioritize purchasing products that are made with postconsumer recycled content; are recyclable, compostable, or reusable; are less toxic than conventional goods; are manufactured locally; and are fairly traded. Policy NRC-6.5: Solid Waste Diversion Ordinances. The City shall continue to implement the Disposable Food Service Ware Ordinance (Adopted February 23, 2021) and the Single-Use Carryout Bag Ordinance (adopted in 2012) to divert and reduce solid waste and single-use plastics. Policy NRC-6.6: Waste Management Services. The City shall continue to contract waste management services to provide quality and cost- effective solid waste removal throughout the city and require all residents and businesses to comply with solid waste collection service requirements. Policy NRC-6.7: Bay Area Green Business Program. The City shall continue to participate in the Bay Area Green Business Program that allows businesses to brand themselves as green by following sustainable practices. Policy NRC-6.8: Waste

Control Measures	Consistency
Water Control Measures	
WR2: Support Water Conservation . Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	Consistent : Proposed Goal NRC-3 of the Natural Resource Conservation Element is focused on the conservation of water resources to provide long-term community water needs. Policies NRC-3.1 through NRC-3.5 have measures that encourage water conservation in new and existing development by requiring compliance with CALGreen standards, Water Efficient Landscape Ordinance, recycling water, and educating the community on reducing water consumption.

SPECIFIC PLAN

The following includes a discussion of consistency with 2017 Clean Air Plan criteria for the Specific Plan.

The 2017 Clean Air Plan contains 85 control strategies aimed at reducing air pollution and protecting the climate in the Bay Area. For consistency with climate planning efforts at the State level, the control strategies in the 2017 Clean Air Plan are based on the same economic sector framework used by CARB, which encompass stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Table 3.2-8 identifies applicable control measures, discusses Specific Plan consistency, and shows corresponding policies from the 2040 General Plan and Specific Plan that address the measures.

Control Measures	Consistency
Transportation	
TR2: Trip Reduction Programs . Implement the regional Commuter Benefits Program (Rule 14-1) that requires employers with 50 or more Bay Area employees to provide commuter benefits. Encourage trip reduction policies and programs in local plans, e.g., general and specific plans, while providing grants to support trip reduction efforts. Encourage local governments to require mitigation of vehicle travel as part of new development approval, to adopt transit benefits ordinances in order to reduce transit costs to employees, and to develop innovative ways to encourage rideshare, transit, cycling, and walking for work trips. Fund various employerbased trip reduction programs.	 Consistent: Buildout of the Specific Plan would promote compatible land uses resulting in City residents living and working in closer proximity to each other. Proposed Specific Plan policies such as LU-2.1 emphasize housing near jobs in the City. Policy LU-1: Infill Development. The City shall support high quality infill development that provides a rich mix of businesses, housing types, and community-serving uses and encourage public transit, walking, and biking
TR3: Local and Regional Bus Service. Fund local and regional bus projects, including operations and maintenance.	Consistent. Proposed Goal M-2 of the 2040 General Plan Mobility Element focuses on providing efficient, convenient, and accessible public transit system for residents, workers, and visitors in Millbrae. In particular, the following Proposed Specific Plan policy intends to provide measures for improved transit access and regional transit connections in Millbrae: Policy CP-15: Bus Stops. The City shall work with partner agencies to encourage improvements to bus stops and addition of amenities along El Camino Real (e.g., shelters, trash receptacles, Wi-Fi) that

Control Measures	Consistency
	encourage transit use, contribute to sense of place, and improve the public realm.
TR6: Freeway and Arterial Operations. Improve the performance and efficiency of freeway and arterial systems through operational improvements, such as implementing the Freeway Performance Initiative, the Freeway Service Patrol and the Arterial Management Program.	Consistent. Proposed Goal CP of the Specific Plan is intended to provide a safe and well-connected circulation network that promotes transportation mode choices, reduces vehicle traffic, and promotes healthy lifestyles. In addition, Proposed Policy CP-11 calls for the City to work with Caltrans to implement the Streetscape plan and improve pedestrian crossings on El Camino Real to increase the predictability and visibility of pedestrians by providing complete sidewalk coverage, signal controlled crosswalks, minimizing the intersection footprint, reducing pedestrian crossing distances, shortening traffic signal cycle lengths, and using high-visibility treatments. These improvements shall focus on the intersection crossings along El Camino Real, and at Millbrae Avenue and the U.S. Highway 101 onramps.
TR9: Bicycle and Pedestrian Access and Facilities. Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.	 Consistent: Proposed policies in the Specific Plan support an efficient and safe bicycle and pedestrian system that would improve the connectivity and accessibility throughout the city, as shown in the policies below: Policy CP-12: Bicycle Lanes on El Camino Real. The City shall work with Caltrans to add separated bicycle lanes on El Camino Real to increase cyclist safety, enhance connectivity, reduce automobile reliance, and encourage active lifestyle choices. Policy CP-13: Bicycle Route Alternatives to El Camino Real. The City shall add and maintain bicycle routes along Magnolia Avenue and Hemlock Avenue to provide lower volume and lower speed route alternatives to El Camino Real Policy CP-14: Bicycle Parking. The City shall require new development to provide safe and secure bicycle parking facilities, such as bike lockers, bike storage rooms at ground level, and bike racks that allow for proper two-point locking.
TR13: Parking Policies . Encourage parking policies and programs in local plans, e.g., reduce minimum parking requirements; limit the supply of off-street parking in transit-oriented areas; unbundle the price of parking spaces; support implementation of demand-based pricing (such as "SF Park") in high-traffic areas.	Consistent : The Specific Plan has proposed policies that recognize that parking should be balanced with other objectives that encourage transit use, bicycling, and walking, such as: Policy CP-2: Parallel Parking on Broadway. The City shall consider implementing parallel parking on Broadway (Consistent with the recommendations of the Downtown and El Camino Real Streetscape Plan) to allow for increased sidewalk widths, subject to further study of parking provisions for adjacent businesses. Policy CP-3: New Parking Facilities. The City shall encourage structured, underground, or tuck-under parking in new development, and discourage new or expanded surface parking lots. Encourage shared parking facilities especially in downtown.
Energy	
EN1: Decarbonize Electricity Production. Engage with PG&E, municipal electric utilities and CCEs to maximize the amount of renewable energy contributing to the production of electricity within the Bay Area as well as electricity imported into the region. Work with local governments to implement local renewable energy programs. Engage with stakeholders including dairy farms, forest	Consistent. Proposed goals and policies contained in the 2040 General Plan would be applicable to the Specific Plan and would support the City's efforts to implement energy efficiency and renewable energy measures. These policies can be seen in Table 3.2-3.

Control Measures	Consistency
managers, water treatment facilities, food processors, public works agencies and waste management to increase use of biomass in electricity production.	Considently
EN2: Decrease Electricity Demand . Work with local governments to adopt additional energy-efficiency policies and programs. Support local government energy efficiency program via best practices, model ordinances, and technical support. Work with partners to develop messaging to decrease electricity demand during peak times.	Consistent : Proposed goals and policies contained in the 2040 General Plan would be applicable to the Specific Plan and would support the City's efforts to conserve various resources that would translate to energy conservation, such as improving water and power conservation. These policies can be seen in Table 3.2-3.
Buildings	
BL1: Green Buildings . Collaborate with partners such as KyotoUSA to identify energy-related improvements and opportunities for on-site renewable energy systems in school districts; investigate funding strategies to implement upgrades. Identify barriers to effective local implementation of the CALGreen (Title 24) statewide building energy code; develop solutions to improve implementation/enforcement. Work with ABAG's BayREN program to make additional funding available for energy-related projects in the buildings sector. Engage with additional partners to target reducing emissions from specific types of buildings.	Consistent : Implementation of the proposed policies from the 2040 General Plan listed in Table 3.2-3 that would promote green building standards would be applicable to the Specific Plan. In addition, future development envisioned under the Specific Plan would be required to comply with all energy standards of Title 24 that are in effect at the time of development.
Waste Management Control Measures	
WA4: Recycling and Waste Reduction. Develop or identify and promote model ordinances on community-wide zero waste goals and recycling of construction and demolition materials in commercial and public construction projects	Consistent. The following proposed Specific Plan policies would be implemented to improve waste disposal: Policy CIP-1: Street Cleanliness. The City shall improve and maintain the cleanliness of downtown, including but not limited to, controlling litter, providing additional trash receptacles, and

Overall, the 2040 General Plan and Specific Plan would be consistent with the three criteria for evaluating consistency with the 2017 Clean Air Plan . As such, the 2040 General Plan and Specific Plan would not conflict with or obstruct implementation of the applicable air quality plan. Therefore, the impact related to air quality management plan consistency would be less than significant.

increasing frequency of waste pickup and street cleaning

Mitigation Measures

No mitigation is required.

Significance After Mitigation

Less than significant without mitigation

Criteria Air Pollutants Emissions Compared to Air Quality Standards

Significance Criterion b:	Would the proposed plans result in a cumulatively considerable net
	increase of any criteria pollutant for which the project region is non-
	attainment under an applicable federal or State ambient air quality
	standard?

Impact AQ-2 IMPLEMENTATION OF THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD RESULT IN THE GENERATION OF AIR POLLUTANTS DURING CONSTRUCTION OF FUTURE PROJECTS, WHICH COULD AFFECT LOCAL AIR QUALITY. IMPLEMENTATION OF THE PROPOSED PLANS WOULD ALSO RESULT IN A NET INCREASE OF CRITERIA POLLUTANTS DUE TO THE OPERATIONAL VMT INCREASE ASSOCIATED WITH RETAIL USES. ALL FEASIBLE MITIGATION MEASURES TO REDUCE VMT ARE INCLUDED AS POLICIES IN THE PLANS, AND ARE, THEREFORE, PART OF THE PLANS. OVERALL IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

Buildout facilitated by the 2040 General Plan and Specific Plan would involve activities that result in air pollutant emissions. Specifically, construction activities such as demolition, grading, construction worker travel, delivery and hauling of construction supplies and debris, and fuel combustion by onsite construction equipment would generate pollutant emissions. These construction activities would create emissions of dust, fumes, equipment exhaust, and other air contaminants, particularly during site preparation and grading. The extent of daily emissions, particularly ROGs and NO_X emissions, generated by construction equipment, would depend on the quantity of equipment used and the hours of operation for each project. The extent of PM_{2.5} and PM₁₀ emissions would depend upon the following factors: 1) the amount of disturbed soils; 2) the length of disturbance time; 3) whether existing structures are demolished; 4) whether excavation is involved; and 5) whether transporting excavated materials offsite is necessary. Dust emissions can lead to both nuisance and health impacts. According to the 2017 BAAQMD *CEQA Air Quality Guidelines*, PM_{2.5} is the greatest pollutant of concern during construction.⁷

The BAAQMD 2017 *CEQA Air Quality Guidelines* have no plan-level significance thresholds for construction air pollutant emissions that would apply to the 2040 General Plan. However, the guidelines include project-level thresholds for construction emissions. If an individual project's construction emissions fall below the project-level thresholds, the project's impacts on regional air quality would be individually and cumulatively less than significant. The BAAQMD has also identified feasible fugitive dust control measures for construction activities. These Basic Construction Mitigation measures are recommended for all projects. In addition, the BAAQMD and CARB have regulations that address the handling of hazardous air pollutants such as lead and asbestos, which could be aerially disbursed during demolition activities. BAAQMD rules and regulations address both the handling and transport of these contaminants. Construction of development envisioned under the project would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution concentrations or air quality nuisances.

To promote clean air quality to protect public health and safety and to mitigate adverse air quality impacts, the 2040 General Plan includes Policies NRC-4.1, NRC-4.2, and NRC-4.3 in the *Natural*

⁷ BAAQMD. 2017a. California Environmental Quality Act Air Quality Guidelines. May. https://www.baaqmd.gov/~/media/files/planningand-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en (accessed March 2022).

Resource Conservation Element, which support implementation of feasible measures to reduce construction emissions associated with buildout of the 2040 General Plan. These policies are listed below.

- Policy NRC-4.1 Ambient Air Quality Standards. The City shall continue to work with the California Air Resources Board and the Bay Area Air Quality Management District (BAAQMD) to meet State and Federal ambient air quality standards.
- **Policy NRC-4.2 Reduce Construction and Operational Emissions.** The City shall require new development projects to incorporate design or operational features that reduce construction and operational emissions of reactive organic gases (ROG), nitrogen oxides (NOX), and particulate matter (PM10 and PM2.5) to a less than significant level.
- **Policy NRC-4.4 Preferences for Reduced-Emission Equipment.** The City shall give preference to contractors using reduced-emission equipment for City construction projects and contracts for services (e.g., garbage collection), as well as businesses that practice sustainable operations.

The 2040 General Plan Policy NRC-4.1 encourages cooperation with BAAQMD to meet air quality standards and Policy NRC-4.2 states that City will require new developments to reduce construction emissions through project design or inclusion of project features. Under Policy NRC-4.4, the City of Millbrae would give preference to contractors that utilize reduce emissions equipment for City projects. These policies would reduce construction emissions generated by future projects facilitated by the 2040 General Plan and Specific Plan. However, the 2040 General Plan and Specific Plan do not include policies that would reduce fugitive dust emissions. The absence of measures to control fugitive dust emissions would be a potentially significant impact. However, implementation of the BAAQMD Basic Construction Mitigation Measures, which would be required with implementation of Mitigation Measures AQ-1, during future project-level construction would reduce fugitive dust emissions from construction activities. Actions include watering onsite and reduce vehicle speed on unpaved roads to limit the amount of soil and dust disturbed. With adherence to these 2040 General Plan policies listed above and Mitigation Measure AQ-1, cumulative construction impacts associated with violating an air quality standard or contributing substantially to an existing or projected air quality violation in terms of criteria air pollutant emissions would be less than significant with mitigation.

Operation

2040 GENERAL PLAN

The greatest source of criteria pollutants in Millbrae is and would continue to be from transportation sources, specifically mobile emissions from roadway traffic. The 2040 General Plan emphasizes reducing VMT on area roadways through emphasizing greater residential density, proximity of residents to jobs, and the support of alternative methods of transportation. It should be noted that since land use changes and development facilitated by 2040 General Plan would be located in the Specific Plan area 2040 General Plan air quality impacts would be related to development in the Specific Plan area, and there would be no impact in this regard outside of the Specific Plan area. The 2040 General Plan policies that support a VMT reduction, and thus a reduction in mobile criteria pollutants, are listed below:

- **Policy LU-1.2** Land Uses that Maximize Transit. The City shall encourage higher-intensity development around the Millbrae Station and along the El Camino Real corridor that maximizes transit use.
- **Policy LU-2.2** Maximize Mixed-Use Residential Density. The City shall support opportunities that enable people to live close to job locations.
- **Policy LU-2.3** Housing Near Jobs. The City shall support opportunities that enable people to live close to job locations.
- **Policy LU-7.4 High Density, Mixed-Use Development.** The City shall encourage high density, mixed-use development in the Station Area with restaurants, retail, entertainment, offices, and residential to promote the creation of a compact, walkable, transit-oriented district.
- **Policy LU-7.6 Class A Office Space.** The City shall encourage Class A office development in the Station Area to take advantage of proximity to the Millbrae Station, U.S. Highway 101, and new residential development. The City shall encourage developers to employ state-of-the-art design techniques to maximize space, flexibility, and functionality.
- **Policy M-1.1** Serving All Users. The City shall develop, or require new development to incorporate into proposed projects, complete streets infrastructure, where applicable, sufficient to provide safe, comfortable, and convenient travel along and across streets to serve all types of travel (including pedestrians, bicyclists, motorists, movers of commercial goods, micromobility, and public transportation), and users (including persons with disabilities, seniors, children, and families).
- **Policy M-1.2 Multimodal Choices.** The City shall promote development of an integrated, multimodal transportation system that offers desirable choices among travel modes including micromobility, pedestrian ways, bikeways, public transportation, and roadways.
- **Policy M-1.4** Accessibility and Connectivity. The City shall create a more comprehensive multimodal transportation system by identifying and eliminating gaps in roadways, bikeways, and pedestrian networks; increasing transit access in underserved areas; and removing natural and man-made barriers to accessibility and connectivity.
- **Policy M-1.9** Wayfinding. The City shall maintain and enhance wayfinding signage designed to serve all travel modes, particularly at major intersections and in the Downtown to enhance connectivity to the transit corridors and Millbrae Station.
- **Policy M-1.15 Transportation Studies for New Development.** The City shall require new development projects to perform site-specific transportation studies based on City implementation standards (including access, circulation, parking, and safety for all transportation modes) to identify and implement transportation-related improvements (and/or a fair share contribution via the payment of the applicable required Development Impact Fees for transportation and mobility) to maintain acceptable level of service standards, VMT thresholds, safe access for all modes, and acceptable traffic operations at project access points consistent with Policy M-1.12.

- **Policy M-2.1 Caltrain and BART.** The City shall coordinate with Caltrain and BART to assure the Millbrae Station is well-maintained, has adequate parking, a safe environment, and continues to provide high-quality service.
- **Policy M-2.2 California High Speed Rail.** The City shall continue to work with and strongly advocate that the California High-Speed Rail Authority plan a high-quality, well-designed Millbrae-SFO Station that enhances access and services and fully integrates all transit modes serving the Station into a single station and is also coordinated and interconnected with the surrounding environment including development projects. The City will continue to request that a variety of alternatives are considered, including alternatives that provide the least impact on the community.
- **Policy M-2.3 Bus and Shuttle Service.** The City shall work with SamTrans, other agencies, private companies, and organizations to provide and manage appropriate community-serving transit service and coordination of schedules and services with other transit agencies. Shuttle service should focus on connecting transit, hotels, and employment centers with the City's Downtown.
- **Policy M-3.1** Active Transportation Plan. The City shall maintain and implement the Active Transportation Plan to enhance the city's bicycle and pedestrian network.
- **Policy M-3.2 Trail Access.** The City shall enhance the system of pathways providing access to the Spur Trail, the Bay Trail, the Bay Area Ridge Trail, the Crystal Springs Regional Trail, and closing gaps in the trail system.
- **Policy M-3.3 Bay Trail.** The City shall support the completion of the Bay Trail in coordination with regional agencies, and the selection of the trail route and implementation of the trail system in an appropriate alignment between Millbrae and South San Francisco.
- Policy M-3.4 Bikeways System. The City shall develop and maintain a safe and logical bikeways system that is coordinated with the countywide system (consistent with the San Mateo County Bicycle and Pedestrian Plan) and the neighboring cities of San Bruno and Burlingame.
- **Policy M-3.5 Bicycle Lanes on El Camino Real.** The City shall explore options for providing separated or buffered bicycle lanes along El Camino Real and developing parallel alternative routes to the El Camino Real route to provide for connectivity for bicyclists of all ages and abilities, consistent with the Active Transportation Plan and Downtown and El Camino Real Specific Plan.
- **Policy M-3.6 Bicycle Safety.** The City shall require bicycle facilities to be upgraded to increase the visibility and protection of bicyclists relative to other roadway users. This includes clearer separation between vehicles and bicyclists, clear delineated markings along principal arterials and at intersections (such as green pavement markings), and bicycle signal detection (using bicycle-oriented loop detectors or push buttons).
- Policy M-3.7Bicycle and Pedestrian Facilities. The City shall evaluate new commercial,
multifamily residential, and mixed-use development projects to ensure that the
project provides bicycle and pedestrian facilities approved by the Community
Development Department, adjacent to the project site. Improvements could

include secure bicycle parking, streetlights, street furniture, landscaping, trash receptacles, pedestrian-scaled lighting fixtures, shade, and public art.

- **Policy M-3.8 Pedestrian Safety at Intersections.** The City shall implement the Active Transportation Plan to enhance pedestrian safety with pedestrian countdown displays at signalized intersections, signal timing that minimizes pedestrian wait times and provides adequate crossing times, crosswalks at all approaches, continental and other high-visibility crosswalk striping, corner curb extensions, and perpendicular ADA-standard curb cuts on all corners.
- **Policy M-3.10** Safe Routes to Schools. The City shall coordinate with the school district and parent organizations to support facility construction and new programs, including seeking State and Federal funds, to ensure that Millbrae children can walk or bike to school safely.
- **Policy M-3.11** Shared Electric Bikes and Scooters. The City shall designate locations for mobility hubs and modify existing city infrastructure to accommodate shared bicycles, electric bikes and scooters that provide last-mile solutions to residents and commuters. Infrastructure enhancements include dedicated off-street parking spaces and on-street corrals to accommodate shared electric bike and scooter parking and prevent conflicts with pedestrians.
- **Policy M-4.6 Electric Vehicle Charging Stations.** The City shall work with large employers to expand EV charging in existing buildings and within public parking areas to incentivize EV ownership.
- **Policy M-4.9 Clean Air Vehicle Parking.** The City shall require all new development to provide parking spaces devoted to clean air vehicles.
- **Policy M-4.10 Bicycle Parking.** The City shall require short- and long-term bicycle parking for new development on all land uses, except for single-family dwellings.
- **Policy M-5.1 Countywide TDM Programs Participation.** The City shall continue to participate in countywide TDM programs to assist employers and employees in reducing the use of single-occupancy vehicles and promoting and incentivizing the use of transit, active transportation (i.e., non-motorized transportation), and carpooling/vanpooling.
- Policy M-5.2 San Mateo County Congestion Management Program. The City, in coordination with the City/County Association of Governments of San Mateo County (C/CAG) as the designated Congestion Management Agency for the County, shall implement the County Congestion Management Program and the Land Use Impact Analysis Program, otherwise known as the Transportation Demand Management (TDM Policy). The TDM Policy establishes project review thresholds, vehicle trip reduction and mode share targets, monitoring and reporting requirements, and TDM measures.
- **Policy M-5.3 Bay Area Commuter Benefits Program.** The City shall continue to support the Bay Area Commuter Benefits Program, to improve air quality, reduce emissions of greenhouse gases and other air pollutants, and to decrease traffic congestion in the Bay Area by encouraging employees to commute by transit, carpooling, biking, and other alternative modes

- **Policy M-5.4 Car Sharing.** The City shall explore opportunities to partner with car sharing companies to establish designated car sharing spaces and vehicles in the City, and the City shall explore opportunities for car sharing companies to occupy any required parking spaces on private property provided the cars are made available to the general public.
- Policy M-5.5 Electric Transportation Network Company Vehicles. The City shall encourage the use of EV Transportation Network Company Vehicles (TNCs) in the community
- **Policy M-6.1** Agency Coordination. The City shall coordinate with San Francisco International Airport, the High-Speed Rail Authority, Caltrans, the Peninsula Corridor Joint Powers Board, Metropolitan Transportation Commission (MTC), the San Francisco Bay Area Rapid Transit District, the San Mateo County Transit District, the City/County Association of Governments of San Mateo County and other transit providers and transportation agencies, to meet the travel needs of Millbrae residents, workers, and visitors.
 - **Program B** Active Transportation Plan. The City shall update the Active Transportation Plan every five years to accomplish the following: Assess the needs of pedestrians and cyclists in Millbrae; identify improvements to infrastructure and programs; ensure eligibility to certain transportation funding sources; and to coordinate pedestrian and bicycle local actions and regional projects.
 - Program FFunding of Regional Transit Projects. The City shall continue to implement
agreements with BART and San Francisco International Airport for the funding
of improvements required to mitigate regional transit projects.
- Policy HSHM-1.3 Physical Activity and the Built Environment. The City shall support new developments or infrastructure improvements in existing neighborhoods that enable people to drive less and walk, bike, or take public transit more.
- **Policy NRC-7.1 City Trip Reduction.** The City shall promote reduced idling, trip reduction, routing for efficiency, and the use of public transportation, carpooling, telecommuting, alternative scheduling, and alternate modes of transportation for operating City departments and City employees.
- **Policy NRC-7.2 City Vehicle Replacement.** When replacing vehicles, the City shall purchase zero-emission vehicles, if a zero-emission vehicle is feasible based on use, for the City's fleet and use renewable fuel sources, such as bio-diesel for trucks and heavy equipment. If a zero-emission or renewable fuel vehicle is not feasible based on use, then the City shall consider a hybrid or fuel-efficient vehicle.

According to the BAAQMD 2017 *CEQA Air Quality Guidelines,* the threshold for criteria air pollutants and precursors requires an assessment of the rate of increase of plan VMT and population. Table 3.2-9 summarizes the net increase in service population versus VMT for 2040 General Plan buildout. The project is projected to accommodate a service population increase of 14,512 persons by the year 2040. This is a 48.7 percent increase compared to the existing service population of 29,774 persons. The project would generate an estimated daily VMT of 1,257,516 miles in the year 2040, which is an increase of 415,893 miles or 49.4 percent compared to baseline conditions (841,623 miles).

Scenario	Baseline (2019)	2040 General Plan Buildout	Net Increase
Population	29,774	44,286	14,512
Percentage change			48.7%
VMT	841,623	1,257,516	415,893
Percentage change			49.4%

Table 3.2-9 Net Increase in 2040 General Plan Service Population versus VMT

Despite the emphasis from the 2040 General Plan to change land uses to concentrate growth and residences to jobs and services to reduce singular vehicle trips and encourage alternative models of travel, VMT would increase proportionately greater than the City's population because of the emphasis on retail development in the City. With greater retail uses in the City, the VMT is modeled to increase. Therefore, while the 2040 General Plan policies listed above would have the effect of reducing mobile VMT, and in turn operational criteria pollutants, in the City, the proportional VMT increase slightly exceeds (less than one percent) the service population increase in the City. No feasible mitigation measures beyond these 2040 General Plan policies can be implemented to reduce VMT-related criteria pollutant emissions. Ultimately vehicle emissions depend on individual transportation choices that the City would not have full control over. Therefore, 2040 General Plan impacts from operational criteria pollutant emissions would be significant and unavoidable.

SPECIFIC PLAN

The greatest source of criteria pollutants in the Specific Plan area are and would continue to be from transportation sources, specifically mobile emissions from roadway traffic. The Specific Plan emphasizes reducing VMT on area roadways through emphasizing greater residential density, proximity of residents to jobs, and the support of alternative methods of transportation. The Specific Plan measures that support a VMT reduction, and thus a reduction in mobile criteria pollutants, are listed below:

Policy LU-1	Infill Development. The City shall support high quality infill development that		
	provides a rich mix of businesses, housing types, and community-serving uses and		
	encourage public transit, walking, and biking		

- Policy LU-2 Mixed-use Development. The City shall encourage vertical mixed-use development with active ground floor uses, and residential and office uses on the upper floors
- **Policy LU-3 El Camino Real.** The City shall prioritize higher density and intensity development along El Camino Real and establish a multimodal complete street, lined with a diverse mix of uses that are context sensitive and includes an attractive streetscape design that creates an inviting pedestrian environment and a positive city image
- **Policy LU-4 Downtown.** The City shall encourage a mix of small- scale, infill development with community gathering places that serves residents and attracts more pedestrian traffic, while enhancing the charming character of downtown.

- Policy CP-11 Pedestrian Crossings. The City shall work with Caltrans to implement the Streetscape Plan and improve pedestrian crossings on El Camino Real to increase the predictability and visibility of pedestrians by providing complete sidewalk coverage, signal controlled crosswalks, minimizing the intersection footprint, reducing pedestrian crossing distances, shortening traffic signal cycle lengths, and using high-visibility treatments. These improvements shall focus on the intersection crossings along El Camino Real, and at Millbrae Avenue and the U.S. Highway 101 onramps.
- **Policy CP-12 Bicycle Lanes on El Camino Real.** The City shall work with Caltrans to add separated bicycle lanes on El Camino Real to increase cyclist safety, enhance connectivity, reduce automobile reliance, and encourage active lifestyle choices
- Policy CP-13 Bicycle Route Alternatives to El Camino Real. The City shall add and maintain bicycle routes along Magnolia Avenue and Hemlock Avenue to provide lower volume and lower speed route alternatives to El Camino Real.
- **Policy CP-14 Bicycle Parking.** The City shall require new development to provide safe and secure bicycle parking facilities, such as bike lockers, bike storage rooms at ground level, and bike racks that allow for proper two-point locking
- Policy CP-15 Bus Stops. The City shall work with partner agencies to encourage improvements to bus stops and addition of amenities along El Camino Real (e.g., shelters, trash receptacles, Wi-Fi) that encourage transit use, contribute to sense of place, and improve the public realm
- **Policy CP-16** Micro-mobility. The City shall provide micro-mobility options such as bike and scooter shares, and design the streetscape and public plazas to accommodate docking stations, bike parking, etc.
- **Policy CP-17** Widened Sidewalk and Multi-use Curb Lane on El Camino Real. The City shall incorporate elements along El Camino Real that provide multi-use curb lanes which accommodate a variety of curb uses such as on-street parking, ride-share pick-up/drop-off, loading, parklets, micro-mobility docking stations, etc.
- Policy OS-1 Pedestrian-oriented Public Realm. The City shall enhance the public realm to promote an engaging, safe, and comfortable pedestrian experience. Improvements should include the addition of plazas, parklets, outdoor seating, consistent street planting and other landscape elements, wide sidewalks, sidewalk furniture, and public art.
- **Policy OS-2** Network of Public Open Spaces. The City shall provide a network of public open spaces, including outdoor plazas, parks, and parklets, that is connected by pedestrian walkways and paths

According to the BAAQMD 2017 *CEQA Air Quality Guidelines,* the threshold for criteria air pollutants and precursors requires an assessment of the rate of increase of plan VMT and population. Table 3.2-10 summarizes the net increase in population versus VMT for Specific Plan buildout. The Specific Plan is projected to accommodate a population increase of 9,111 persons. This is a 54.9 percent increase compared to the existing population of 5,880 persons. The Specific Plan would generate an estimated daily VMT of 307,156 miles in the year 2040, which is an increase of 91,520 miles or 42.4 percent compared to baseline conditions (215,636 miles).

Scenario	Baseline (2019)	Specific Plan Buildout	Net Increase
Population	3,455	5,956	2,501
Percentage change			54.9%
VMT	215,636	307,156	91,520
Percentage change			42.4%

Table 3.2-10 Net Increase in Specific Plan Population versus VMT

Because the VMT associated with Specific Plan buildout would increase by approximately 42 percent, it would not exceed the rate of increase from the forecast population of approximately 55 percent. VMT increases at a lower percentage, because the proposed plans would facilitate land use changes to concentrate growth and residences in proximity to jobs and services in order to reduce singular vehicle trips and encourage alternative models of travel. The proportion of VMT increases under the Specific Plan would not exceed the population growth within the Specific Plan. Therefore, impacts concerning criteria pollutants generated from operation of the Specific Plan would be less than significant.

Overall

Overall, cumulative impacts would be significant and unavoidable.

Mitigation Measures

MITIGATION MEASURE AQ-1: IMPLEMENT BAAQMD BASIC CONSTRUCTION MITIGATION MEASURES

To reduce fugitive dust emissions from the construction of individual projects, the City shall require that future projects implement the BAAQMD Basic Construction Mitigation Measures. The BAAQMD Basic Construction Mitigation Measures are listed below:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times a day.
- All haul trucks transporting soil, sand, or other loose material off-site 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 is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- All roadways, driveways, and 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.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of 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 manufacture's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper conditions prior to operation.

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

Level of Significance

Significant and unavoidable

Effects of Toxic Air Contaminants Emissions

Significance Criterion c: Would the proposed plans expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 CONSTRUCTION ACTIVITIES FOR INDIVIDUAL PROJECTS FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN LASTING LONGER THAN TWO MONTHS OR LOCATED WITHIN 1,000 FEET OF SENSITIVE RECEPTORS COULD EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS. IMPLEMENTATION OF THE PROPOSED PLANS MAY ALSO EXPOSE SENSITIVE RECEPTORS TO ADDITIONAL SOURCES OF TOXIC AIR CONTAMINANTS. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

Development facilitated by the 2040 General Plan and Specific Plan would result in DPM exhaust emissions from off-road, heavy-duty diesel equipment associated with site preparation (e.g., excavation, grading, clearing), building construction, and other miscellaneous construction activities. DPM was identified as a TAC by CARB in 1998. The potential cancer risk from the inhalation of DPM, as discussed below, outweighs the potential non-cancer⁸ health impacts.⁹

Generation of DPM from construction typically occurs in a single area for a short period. Construction of development facilitated by the project would occur over approximately a decade but use of diesel-powered construction equipment in any one area would likely occur for no more than a few years for an individual project and would cease when construction is completed in that area. It is impossible to quantify risk without identified specific project details and locations.

The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period. According to the California Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such

⁸ Non-cancer risks include premature death, hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma, increased respiratory symptoms, and decreased lung function (CARB 2021a).

⁹ California Air Resources Board (CARB). 2021. Overview: Diesel Exhaust & Health. https://ww2.arb.ca.gov/resources/overview-dieselexhaust-and-health

assessments should be limited to the period/duration of activities associated with the development.¹⁰ BAAQMD use an exposure period of 30 years.¹¹

The maximum PM₁₀ and PM_{2.5} emissions would occur during demolition, site preparation and grading activities, which would only occur for a portion of the overall estimated timeframe of one to eight years for individual project construction. These activities would typically last for approximately two weeks to two years, depending on the extent of grading and excavation required (e.g., projects with subterranean parking structures or geological constraints require additional grading as compared to those without). PM₁₀ and PM_{2.5} emissions would decrease for the remaining construction period because construction activities such as building construction and architectural coating would require less intensive construction equipment. While the maximum DPM emissions associated with demolition, site preparation, and grading activities would only occur for a portion of the overall construction period, these activities represent the worst-case condition for the total construction period. This would represent between 0.1 to 7 percent of the total 30-year exposure period for health risk calculation.

The 2040 General Plan contains the following policy that would have the effect of minimizing construction TACs from future projects facilitated by 2040 General Plan and Specific Plan:

Policy NRC-4.2 Reduce Construction and Operational Emissions. The City shall require new development projects to incorporate design or operational features that reduce construction and operational emissions of reactive organic gases (ROG), nitrogen oxides (NOX), and particulate matter (PM10 and PM2.5) to a less than significant level.

Future projects facilitated by the 2040 General Plan and Specific Plan would also be required to be consistent with the applicable 2017 Clean Air Plan, BAAQMD regulatory requirements and control strategies, and the CARB In-Use Off-Road Diesel Vehicle Regulation, which are intended to reduce emissions from construction equipment and activities. Additionally, future development facilitated by the 2040 General Plan and Specific Plan would be required to comply with Mitigation Measure AQ-1 requiring implementation of construction emission measures which would reduce construction-related TACs. According to the OEHHA, construction of individual projects lasting longer than two months or placed within 1,000 feet of sensitive receptors could potentially expose nearby sensitive receptors to substantial pollutant concentrations and therefore could result in potentially significant risk impacts. These future projects could exceed BAAQMD's thresholds of an increased cancer risk of greater than 10.0 in a million and an increased non-cancer risk of greater than 1.0 Hazard Index (Chronic or Acute). Therefore, construction impacts from TAC emissions would be potentially significant. However, implementation of Mitigation Measure AQ-2 would require coordination with the City to determine if a construction HRA would need to be performed for future projects with construction timelines greater than two months and within 1,000 feet of sensitive receptors, in order to reduce potential risk exposure to nearby sensitive receptors. Therefore, construction-related TACs exposure impacts would be less than significant with mitigation.

¹⁰ Office of Environmental Health Hazard Assessment. 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0 ¹¹ Bay Area Air Quality Management District (BAAQMD). 2016. Air Toxics NSR Program Health Risk Assessment Guidelines. December. https://www.baaqmd.gov/~/media/files/planning-and-research/permit-modeling/hra_guidelines_12_7_2016_clean-pdf.pdf?la=en

Operation

The BAAQMD CEQA Guidelines include methodology for jurisdictions wanting to evaluate the potential impacts from placing sensitive receptors proximate to major air pollutant sources. For assessing community risk and hazards for siting a new receptor, sources within a 1,000-foot radius of a project site are typically considered. Sources are defined as freeways or high-volume roadways with 10,000 vehicles or more per day and permitted sources.¹²

2040 GENERAL PLAN

Development facilitated by the 2040 General Plan could accommodate a net increase of approximately 1,880 residential units; 200,000 square feet (240 rooms) of hotel use; 105,000 square feet of office space; 225,000 square feet of commercial use; and 106,000 square feet of restaurant space. The buildout of the 2040 General Plan would not site land uses that typically generate TAC, such as industrial land uses, in proximity to residential land uses. Additionally, if the proposed hotel, commercial, and retail uses site a new stationary TAC source, like an emergency generator, then said stationary source would be required to receive a permit from BAAQMD. The permitting process would ensure that the stationary source does not present a health risk to existing nearby sensitive receptors.

Furthermore, there are several high-volume roadways and freeways in and around Millbrae including United States Highway 101, State Route (SR) 82 (i.e., El Camino Real), and Interstate 280. The 2040 General Plan may facilitate locating sensitive receptors in proximity to these high-volume roadways and freeways. It should be noted that (since land use changes and development facilitated by 2040 General Plan would be located in the Specific Plan area) 2040 General Plan air quality impacts would be related to development in the Specific Plan area, and there would be no impact in this regard outside of the Specific Plan area.

To minimize health risks to sensitive receptors near stationary sources and/or freeways and highvolume roadways, the 2040 General Plan includes Policy NCR-4.3, listed below, which supports implementation of feasible policies to reduce TAC emissions associated with buildout of the 2040 General Plan.

- **Policy NRC-4.2 Reduce Construction and Operational Emissions.** The City shall require new development projects to incorporate design or operational features that reduce construction and operational emissions of reactive organic gases (ROG), nitrogen oxides (NOX), and particulate matter (PM10 and PM2.5) to a less than significant level.
- **Policy NRC-4.3 Minimize Sensitive Receptor Exposure.** The City shall work with BAAQMD to evaluate exposure of sensitive receptors to odors, toxic air contaminants (TAC), and fine particulate matter (PM2.5). The City shall also require new development to implement applicable best management practices that will limit exposure of new sensitive receptors to a less than significant level (e.g., daycare facilities, elderly housing, and convalescent facilities).

In addition, the following policies from the Land Use Element 2040 General Plan, re-enforce the need for compatible land uses to reduce exposure to environmental hazards.

¹² BAAQMD. 2017a. California Environmental Quality Act Air Quality Guidelines. May. https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en (accessed March 2022).

- **Policy LU-11.1 Environmental Justice Consideration.** The City shall consider potential adverse health and safety impacts associated with land use decisions and reduce negative impacts on residents from hazardous materials, industrial activities, facility locations, and design features.
- **Policy LU-11.2 Environmental Protection.** The City shall apply environmental protection measures equally among all neighborhoods and areas within the community.
- **Policy LU-11.4** New Incompatible Uses. The City shall limit the introduction of new incompatible land uses and environmental hazards into existing residential areas.

Policy NRC-4.3 from the 2040 General Plan requires an analysis to determine if proposed or existing sources of TACs would expose sensitive receptors to potential health risks. Best management practices would need to be implemented to reduce impacts. Policy NRC-4.2 also requires that projects under the 2040 General Plan include features that reduce construction and operational emissions, which would also reduce TAC exposure. Additionally, policies from the 2040 General Plan Land Use Element such as Policy LU-11.1 and Policy LU-11.4, call on the City to consider land use compatibility prior to approval of proposed developments to avoid the placement of sensitive receptors near environmental hazards. As individual developments facilitated by the 2040 General Plan are evaluated on a future project-by-project basis policies mentioned above would be implemented to reduce impacts and ensure that sensitive receptors would not be exposed to substantial pollutant concentrations due to location or design. Therefore, with adherence to these 2040 General Plan policies, operational 2040 General Plan impacts related to TAC emissions would be less than significant.

SPECIFIC PLAN

The Specific Plan would not facilitate land uses that typically generate TACs, such as industrial land uses, in proximity to residential land uses. Additionally, if the proposed hotel, commercial, and retail uses would site a new stationary TAC source, like an emergency generator, then said stationary source would be required to receive a permit from BAAQMD. The permitting process would ensure that the stationary source does not present a health risk to nearby sensitive receptors.

Additionally, there are several high-volume roadways and freeways in and around the Specific Plan area including Highway 101 and SR 82. The Specific Plan may facilitate locating sensitive receptors in proximity to these high-volume roadways and freeways. To minimize health risks to sensitive receptors near stationary sources and/or freeways and high-volume roadways, the 2040 General Plan includes Policy NCR-4.3, listed above, which supports implementation of feasible policies to reduce TAC emissions associated with buildout of the Specific Plan. In addition, 2040 General Plan Policies LU-11.1, LU-11.2, and LU-11.4 listed above, reenforce the need for compatible land uses to reduce exposure to environmental hazards in the Specific Plan area. Furthermore, Policy NRC-4.3 from the 2040 General Plan requires an analysis to determine if proposed or existing sources of TACs would expose sensitive receptors to potential health risks.

Best management practices would also need to be implemented to reduce impacts. Policy NRC-4.2 requires that future projects under the 2040 General Plan, and therefore under the Specific Plan, include features that reduce construction and operational emissions, which would in turn also reduce TAC exposure. Additionally, policies from the 2040 General Plan Land Use Element, such as Policy LU-11.1 and Policy LU-11.4, call on the City to consider land use compatibility prior to approval of proposed developments to avoid the placement of sensitive receptors near

environmental hazards. As individual developments facilitated by the Specific Plan are evaluated on a project-by-project basis policies mentioned above would be implemented to reduce impacts and ensure that sensitive receptors would not be exposed to substantial pollutant concentrations due to location or design. Therefore, with adherence to these 2040 General Plan policies, operational Specific Plan impacts related to TAC emissions would be less than significant.

Mitigation Measures

MITIGATION MEASURE AQ-2: CONDUCT CONSTRUCTION HEALTH RISK ASSESSMENT

For individual projects (excluding ADUs, single-family residences, and duplexes) where construction activities would occur within 1,000 feet of sensitive receptors, would last longer than two months, and would not utilize Tier 4 and/or alternative fuel construction equipment, the project applicant shall coordinate with the City to determine if a construction health risk assessment (HRA) shall be performed. If an HRA is to be performed, the HRA shall determine potential risk and compare the risk to the following BAAQMD thresholds:

- Non-compliance with Qualified Community Risk Reduction Plan;
- Increased cancer risk of > 10.0 in a million;
- Increased non-cancer risk of > 1.0 Hazard Index (Chronic or Acute); or
- Ambient PM_{2.5} increase of > 0.3 μg/m³ annual average

If risk exceeds the thresholds, measures such as requiring the use of Tier 4 and/or alternative fuel construction equipment shall be incorporated to reduce the risk to appropriate levels.

Level of Significance

Less than significant with mitigation

Effects of Objectionable Odors

Significance Criterion d: Would the proposed plans result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact AQ-4 THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD NOT CREATE OBJECTIONABLE ODORS THAT COULD ADVERSELY AFFECT A SUBSTANTIAL NUMBER OF PEOPLE. IMPACTS RELATED TO ODORS WOULD BE LESS THAN SIGNIFICANT.

Construction

2040 General Plan and Specific Plan

Implementation of the 2040 General Plan and Specific Plan would generate oil and diesel fuel odors during construction from equipment use as well as odors related to asphalt paving. The odors would be limited to the construction period and would be temporary. Therefore, odors emitted from the construction of individual future projects under the 2040 General Plan and Specific Plan would be less than significant.

Operation

2040 General Plan and Specific Plan

As stated in the BAAQMD *CEQA Guidelines,* land uses typically producing objectionable odors include agricultural uses, wastewater treatment plants, food manufacturing plants, chemical plants, composting, refineries, landfills, and confined animal facilities. Development facilitated by the 2040 General Plan and Specific Plan would include residential, office, and retail development. These land uses typically do not produce objectionable odors. In addition, the 2040 General Plan and Specific Plan would not add additional light industrial/office land uses, such as those identified in Table 3.2-7, that would have the potential to expose sensitive receptors, such as residences, to odors. Odors from new developments proposed under the 2040 General Plan and Specific Plan would also be evaluated under Policy NRC-4.3, *Minimize Sensitive Receptor Exposure*, and be required by the City to implement applicable best management practices that will limit exposure of new sensitive receptors to odors. Other odors from buildout of the 2040 General Plan and Specific Plan include odor emissions that would be limited to odors associated with vehicle and engine exhaust and idling; however, odors from vehicles are not stationary and are dispersed throughout the roadway network. Therefore, operational odor impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Leve of Significance

Less than significant without mitigation

3.2.5 Cumulative Impacts

The geographic scope of the cumulative air quality analysis is the regional air basin, specifically the SFBAAB. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Impact Analysis*) located in Millbrae, Burlingame, South San Francisco, and at the San Francisco International Airport in addition to the proposed plans.

Criteria Air Pollutants

The SFBAAB is in non-attainment for federal standards of ozone and PM2.5 and in non-attainment for the State standard for ozone, PM2.5, and PM10. The SFBAAB is in attainment of all other federal and State standards. Development facilitated by the project would generate particulate matter and the ozone precursors (ROG and NOX) in the area during construction and operation. As described under Impact AQ-1, the 2040 General Plan and Specific Plan would be consistent with the overall goal of the 2017 Clean Air Plan control measures as development would comply with the latest Title 24 regulations and would increase density in urban areas in proximity to transit, allowing for greater use of alternative modes of transportation. Development facilitated by the 2040 General Plan and Specific Plan does not contain elements that would disrupt or hinder implementation of any 2017 Clean Air Plan control measures. In addition, the 2040 General Plan and Specific Plan would support the primary goals of the 2017 Clean Air Plan. Discussion of these impacts considers the cumulative nature of criteria pollutants in the region. Therefore, 2040 General Plan and Specific Plan would not result in a cumulatively considerable contribution to a conflict with or obstruction of implementation of the applicable air quality plan.

As described under Impact AQ-2, 2040 General Plan and Specific Plan construction would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution levels or air quality nuisances. BAAQMD has identified feasible fugitive dust control measures for construction activities because fugitive PM10 and PM2.5 is of concern. These temporary impacts would be mitigated with Mitigation Measures AQ-1. Discussion of these impacts considers the cumulative nature of criteria pollutants in the region; therefore, with mitigation the project would not result in a cumulatively considerable net increase of a criteria pollutant from construction emissions.

In addition, as described under Impact AQ-2, the 2040 General Plan would result in an increase of operational VMT that would proportionally exceed the projected service population increase per the BAAQMD CEQA Air Quality Guidelines for operational emissions from plans. Therefore, impacts from operational criteria pollutant impacts from the 2040 General Plan would be cumulatively considerable. As no feasible mitigation exists to reduce these impacts to less than significant, the 2040 General Plan's contribution to a cumulatively considerable impact would be significant and unavoidable. As the Specific Plan would not result in an increase of VMT that would proportionally exceed the projected service population increase, the Specific Plan's operational criteria pollutant emissions would not be cumulatively considerable.

Therefore, the overall cumulative impact related to criteria air pollutants would be significant and unavoidable.

Toxic Air Contaminants

As identified under Impact AQ-3, 2040 General Plan and Specific Plan development would not have a significant impact from CO hotspots or TACs with implementation of 2040 General Plan policies. Discussion of these impacts considers the cumulative nature of the pollutants in the region, e.g., the cancer risk and non-cancer risk thresholds have been set per existing cancer risks in the area and exceeding those thresholds would be considered a cumulative impact. As implementation of the 2040 General Plan and Specific Plan would not exceed those thresholds with identified mitigation, it would not expose sensitive receptors to a cumulatively considerable amount of substantial pollutant concentrations from CO hotspots or TACs. Therefore, the cumulative impact related to toxic air contaminants would be less than significant with mitigation.

Odors

As identified under Impact AQ-4, 2040 General Plan and Specific Plan development would not have a significant impact from odor emissions. Construction emissions would disperse rapidly with distance, and therefore construction projects in close proximity to one another would not result in combined odors above those analyzed. In addition, 2040 General Plan and Specific Plan development would not contain uses known to result in objectionable odors and therefore cumulative odor impacts from multiple development would not result in a cumulatively considerable increase in odors. Therefore, the cumulative impact related to odors would be less than significant.

Overall Level of Cumulative Significance

Significant and unavoidable

3.3 Biological, Agriculture, and Forestry Resources

3.3.1 Introduction

This section describes existing biological, agricultural, and forestry resources in the General Plan area and Specific Plan area as well as the relevant regulatory framework. This section also evaluates possible direct and indirect impacts to biological resources, including special-status species, sensitive natural communities, regulated waters and wetlands, sensitive habitat and mature native trees, and wildlife movement corridors, associated with implementation of the proposed plans. This section also addresses and evaluates potential impacts related to agricultural and forestry resources. Information included in this section is based on online record searches of the following databases: the California Department of Fish and Wildlife (CDFW) *California Natural Diversity Database* (CNDDB),¹ the California Native Plant Society (CNPS) *Online Inventory of Rare, Threatened and Endangered Plants of California*,² the U.S. Fish and Wildlife Service (USFWS) *National Wetlands Inventory* (NWI),³ USFWS *Critical Habitat Mapper*,⁴ and USFWS *Information, Planning, and Conservation System* (IPaC).⁵

3.3.2 Environmental Setting

Vegetation Communities and Other Land Cover Types

Definitions

Vegetation communities provide wildlife habitat components including food, shelter, movement corridors, and breeding opportunities for wildlife species. They are classified in general terms with an emphasis on vegetation structure, vegetation species composition, soil structure, and water availability. Some wildlife species are generalists that use a variety of habitats, while other species are adapted to very specific habitats. Species that are limited to a single habitat type are more vulnerable to habitat loss and disturbance than are generalists and therefore, may be more at risk to experience population declines.

General Plan Area

The General Plan area encompasses the land within the City of Millbrae limits. The General Plan area is primarily developed and does not offer suitable habitat for special-status species. However, Millbrae is located immediately to the west of the San Francisco Bay, which is an ecologically diverse area supporting many plants and animal species, including special-status species.

Land in the General Plan area largely consists of developed areas that are generally devoid of natural vegetation. According to the City's Existing Conditions Report, approximately 80 percent of the General Plan area is developed with paved areas and structures, while an additional approximately 19 percent of the General Plan area is designated as developed landscaping

¹ California Department of Fish and Wildlife (CDFW). 2022. California Natural Diversity Database, Rarefind V. (accessed April 2022). ² California Native Plant Society (CNPS). 2022. Inventory of Rare and Endangered Plants of California (online edition, v9-01 0.0)

https://www.rareplants.cnps.org (accessed March 2022).

³ U.S. Fish and Wildlife Service (USFWS). 2022a. National Wetlands Inventory (NWI) Wetlands mapper. Available at:

https://www.fws.gov/wetlands/data/mapper.html (accessed March 2022).

⁴ USFWS. 2022b. Environmental Conservation Online System, Critical Habitat Mapper [online].

https://ecos.fws.gov/ecp/report/table/critical-habitat.html (accessed March 2022).

⁵ USFWS. 2022c. Information for Planning and Conservation (IPaC) [online]. https://ecos.fws.gov/ipac/ (accessed March 2022).

(woodland/shrubland/forest). These developed habitats do not offer high quality or suitable habitat for sensitive species. ⁶ Development has altered much of Millbrae's landscape, restricting natural vegetation primarily to the city's parks. Many species are locally rare or no longer occur in portions of Millbrae because of urban development within the city limits. However, these urbanized areas do provide potential habitat for some special-status bat species that may utilize abandoned buildings or structures and large trees as roosting sites. Additionally, the parks within the General Plan area including Junipero Serra County Park, Josephine Waugh Soroptimist Park, and Lions Park have the potential to support special-status species. Seasonal emergent wetlands located alongside Highway 101 at South Lomita Canal have documented occurrences of California red-legged frog (*Rana draytonii*) and San Francisco garter snake (*Thamnophis sirtalis tetrataenia*).⁷

Table 3.3-1 and Figure 3.3-1 display the major vegetation communities and other land cover types present in the General Plan area. This information is based on data from the U.S. Department of Agriculture (USDA) Forest Service Landfire GIS database.⁸ The Landfire GIS database identifies vegetation communities based on Terrestrial Ecological Systems of the United States.⁹ Vegetation communities range from areas of scrub to areas with dense forest cover. Descriptions of each vegetation community but not each land cover type (e.g., developed, introduced, open water) are provided after Table 3.3-1.

Туре	Acres	Percent	
Developed	1,682.42	80.17	
Developed Woodland/Shrubland/Forest	388.30	18.50	
Open Water	12.90	0.61	
Western Oak Woodland and Savanna	7.56	0.36	
Introduced Annual and Biennial Forbland	5.34	0.25	
Western Riparian Woodland and Shrubland	0.89	0.04	
Tidal Marsh	0.44	0.02	
California Mixed Evergreen Forest and Woodland	0.22	0.01	
Redwood Forest and Woodland	0.22	0.01	
Introduced Woody Wetland Vegetation	0.22	0.01	
Total	2098.51	100	
Source: Landfire USDA Forest Service GIS Data 2019			

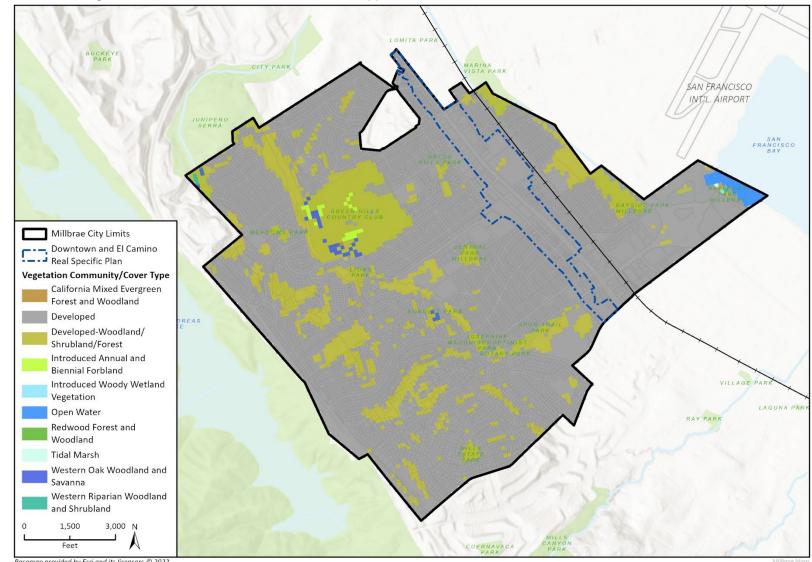
Table 3.3-1 Vegetation Communities and Land Cover Types in the General Plan Area

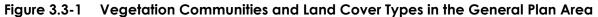
⁶ Millbrae, City of. 2016. Public Review Draft Existing Conditions Report: Millbrae 2040 General Plan. http://www.millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_07_NaturalResources.pdf (accessed April 2022).

⁷ Ibid.

⁸ U.S. Department of Agriculture (USDA). 2019. Forest Service, Landfire Data. http://www.landfire.gov/ (accessed April 2022).

⁹ NatureServe. 2009. International Ecological Classification Standard: Terrestrial Ecological Classifications. NatureServe Central Databases. Arlington, VA, U.S.A. Data current as of 6 February 2009.





Basemap provided by Esri and its licensors © 2022

Additional data provided by LANDFIRE USGS & USFS, 2016; City of Millbrae, 2021.

Millbrae Maps Fig 3.3-1 Vegetation Communities

WESTERN OAK WOODLAND AND SAVANNA

Western oak woodlands are dominated by trees, mostly oaks, 15 to 70 feet tall. These woodlands vary from open savannas to dense, closed-canopy communities. The most common woodland type consists of scattered trees and shrubs with an understory of grasses and forbs. However, in savanna woodlands shrubs are often entirely absent, and the ground is essentially the same as that of grasslands.¹⁰ Western oak woodland and savanna includes California central valley mixed oak savanna and California coastal live oak woodland and savanna. California central valley mixed oak savanna occurs on alluvial terraces and flat plains, often with deep, fertile soils. Valley oak (Quercus lobata) is the characteristic oak species of these savannas, though other characteristic species include interior live oak (Quercus wislizeni), coast live oak (Quercus agrifolia), blue oak (Quercus douglasii), California buckeye (Aesculus californica), western redbud (Cercis occidentalis), California juniper (Juniperus californica), and purple needlegrass (Stipa pulchra). California coastal live oak woodland and savanna are dominated by coast live oak and vary in canopy cover from dense conditions that support sparse understory vegetation of California blackberry (Rubus ursinus), snowberry (Symphoricarpos mollis), toyon (Heteromeles arbutifolia), and poison oak (Toxicodendron diversilobum), to more open conditions with perennial bunchgrass understory. Southern California oak woodlands and savannas are dominated by a mixed closed or open canopy of coast live oak, interior live oak, and/or black oak (Quercus kelloggii). Southern chaparral species such as chamise (Adenostoma fasciculatum), California sagebrush (Artemisia californica), lemonade berry (Rhus integrifolia), sugar sumac (Rhus ovata), fragrant sumac (Rhus aromatica), ceanothus, gooseberry/currant, and manzanita (Arctostaphylos spp.) are also characteristic. This vegetation community is scattered throughout the General Plan area in small patches including in the Green Hills Country Club.

INTRODUCED ANNUAL GRASSLAND/FORBLAND

Introduced annual grasslands are comprised of grasses and forbs introduced during and since the Spanish colonial period.¹¹ Introduced annual and perennial vegetation communities include introduced upland vegetation-annual and biennial forbland, introduced upland vegetation-perennial grassland and forbland, and California annual grassland. Characteristic species of introduced forb and grassland communities include ripgut brome (*Bromus diandrus*), soft chess brome (*Bromus hordeaceus*), foxtail barley (*Hordeum murinum*), broad leaf filaree (*Erodium botrys*), redstem filaree (*Erodium cicutarium*), slender wild oats (*Avena barbata*), wild oats (*Avena fatua*), California goldfields (*Lasthenia californica*), bicolored lupine (*Lupinus bicolor*), and Italian rye grass (*Festuca perennis*). Introduced annual grasslands cover approximately four percent of the General Plan and are scattered throughout the General Plan area in small patches including in the Green Hills Country Club.

WESTERN RIPARIAN WOODLAND AND SHRUBLAND

Western Riparian Woodland and Shrubland communities occur along drainages. These communities are typically dominated by deciduous trees or large shrubs; however, evergreen species may be common or dominant depending on local temperature effects.¹² This community often occurs as a mosaic of multiple communities that are tree dominated with a diverse shrub component. The variety of plant associations connected to this community reflects elevation, stream gradient,

¹⁰ Holland, V. L., and David J. Keil. 1995. California vegetation. Dubuque, Iowa: Kendall/Hunt Pub. Co.

¹¹ ibid.

¹² Ibid.

floodplain width, and flooding events. Dominant trees may include white alder (*Alnus rhombifolia*), boxelder (*Acer negundo*), red alder (*Alnus rubra*), Fremont cottonwood (*Populus fremontii*), red willow (*Salix laevigata*), Goodding's black willow (*Salix gooddingii*), Douglas fir (*Pseudotsuga menziesii*), California sycamore (*Platanus racemosa*), and coast live oak. Dominant shrubs include narrowleaf willow (*Salix exigua*) and arroyo willow (*Salix lasiolepis*). This vegetation community covers approximately one percent of the General Plan area and is found in small patches scattered throughout the General Plan area adjacent to intermittent streams.

TIDAL MARSH

Tidal marshes are a subset of estuarine wetlands defined by the presence of emergent vegetation types uniquely adapted to sheltered intertidal zones of temperate and subtropical coastal plains.¹³ They are found across a full range of salinity conditions from seawater on the immediate coast to freshwater tidal reaches of estuarine river systems. Marshes are transitional ecosystems that provide critical connections between adjacent subtidal and terrestrial ecosystems within the estuarine landscape.

Vegetation of tidal marsh communities are mostly low-growing herbaceous perennials that consist of halophytic species, which are species that prefer growing in water with high salinity. Most species have reduced leaves, and several are succulents.¹⁴ Tidal marsh is located at Bayfront Park along the San Francisco Bay. This community is often permanently or seasonally flooded and dominated by herbaceous plants including cattails, bulrush, and ditch-grass.

CALIFORNIA MIXED EVERGREEN FOREST AND WOODLAND

California Mixed Evergreen Forests and Woodland are dominated by tree species that retain their leaves throughout the year. They generally occur inland in areas that are warmer in summer and that receive less fog and precipitation. Further inland they grade into oak and foothill woodlands.¹⁵ California Mixed Evergreen Forest and Woodland occurs at the Green Hills Country Club and Junipero Serra County Park. Coulter pine trees (*Pinus coulteri*) occur in scattered stands. Characteristic tree species of this vegetation community include three species of oak trees (canyon oak [*Quercus chrysolepis*], coast live oak, and black oak), as well as California bay laurel (*Umbellularia californica*), big leaf maple (*Acer macrophyllum*), and madrone (*Arbutus menziesii*).

REDWOOD FOREST AND WOODLAND

The California coastal redwood forest vegetation community is commonly found on moderately well-drained marine sediments (non-metamorphosed siltstones, sandstones, etc.). This system forms the tallest forests in North America, with individuals reaching 100 meters (m) high (tallest being 106-110 m). Typically, mature stands of coast redwood (*Sequoia sempervirens*) produce a deep shade, so understories can be limited, but coarse woody debris from past disturbance can be quite large. Douglas fir is the common associate among the large trees. Western hemlock (*Tsugo heterophyllu*) is found in old-growth stands, and tanoak (*Notholithocarpus densiflorus*) occurs as a subcanopy in almost all stands (possibly because of fire suppression). This habitat is scattered throughout the General Plan area in small patches intermixed with other habitat types.

¹³ Ibid.

¹⁴ Ibid.

¹⁵ Ibid.

Specific Plan Area

The Specific Plan area encompasses an area immediately parallel to El Camino Real, extending throughout the City. The Specific Plan area is completely developed with existing commercial, residential, and institutional buildings as well as heavily trafficked city streets. The only vegetation present within the Specific Plan area are some scattered street trees lining city streets and El Camino Real, and landscaped ornamental plantings near buildings. The Specific Plan does not offer suitable habitat for plant or wildlife species and has been heavily altered throughout. This Specific Plan area is encompassed in the developed areas of the General Plan area, as described above.

Waters and Wetlands

Definitions

The term "waters of the U.S." has a broad meaning and incorporates both deep-water aquatic habitats and special aquatic sites, including wetlands. Generally, this term applies to the jurisdictional limits of the authority of the U.S. Army Corps of Engineers (USACE) under the Clean Water Act (CWA). Waters of the U.S. includes essentially all surface waters such as all navigable waters and their tributaries, all interstate waters and their tributaries, all wetlands adjacent to these waters, and all impoundments of these waters.

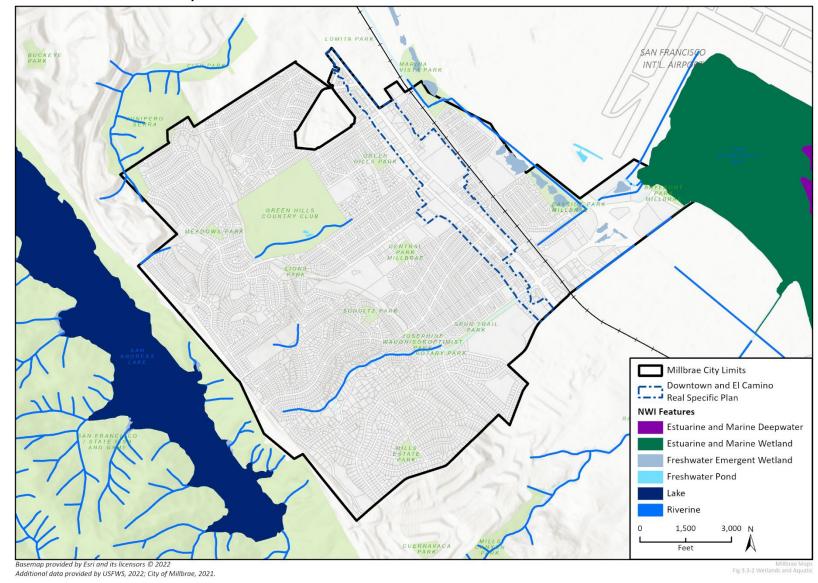
Wetlands are driven by hydrology and occur where water is present near the soil surface resulting in soil and plant characteristics that are not found in upland (mostly dry) or aquatic (almost always wet and un-vegetated) habitats. Wetlands are generally found in transition zones between upland and aquatic habitats. These terms are further defined along with their application in federal and state regulations below under Section 3.3.3, *Regulatory Framework*.

General Plan Area

The USFWS NWI is a publicly available resource that provides detailed information on the abundance, characteristics, and distribution of wetlands. It should be noted that some wetland and stream features, such as freshwater seeps and springs, are generally not identified as part of the NWI because of the general scale of the mapping effort. Therefore, the extent of the major wetlands and waterways in Millbrae, based on NWI mapping, is shown below in Figure 3.3-2. Wetland features that have been mapped either within or near Millbrae include estuarine wetlands, marine habitat (e.g., mudflats), riverine, freshwater emergent wetlands, and freshwater ponds. ¹⁶Wetlands and non-wetland waters provide habitat for a variety of special-status plant and animal species and are typically subject to USACE jurisdiction under section 404 of the CWA. In addition, the State of California has adopted a no-net-loss policy for wetlands which is administered by the CDFW, and State Water Resources Control Board (SWRCB).

Areas of estuarine and marine wetlands are located at the eastern border of the General Plan area at Bayside Park on the San Francisco Bay and provide potential habitat for several special status species. These wetlands are defined as tidally influenced areas subject to flooded and exposed conditions at least once daily and containing perennial emergent vegetation.

¹⁶ USFWS NWI, op. cit.





Freshwater emergent wetlands occur in the eastern part of the General Plan area in undeveloped areas alongside Highway 101. These wetlands are generally seasonally flooded areas where surface water is present for extended periods especially early in the growing season but is absent by the end of the growing season in most years. They are characterized by erect, rooted, herbaceous hydrophytes, excluding mosses and lichens. This vegetation is present for most of the growing season in most years. These wetlands are usually dominated by perennial plants. Freshwater marsh and artificial impoundments such as South Lomita Canal have been documented to support special-status species including California red-legged frog and San Francisco garter snake.

There are several riverine features throughout the General Plan area that are intermittently flooded in nature and generally only contain water briefly after rain events. Some of these features are natural, for example the riverine features at Junipero Serra County Park, while others are manmade or highly altered, such as the drainage canals adjacent to Highway 101.

Specific Plan Area

The Specific Plan area is completely developed with existing buildings and paved areas. According to the NWI, no mapped waters or wetlands are located within the Specific Plan area. $^{\rm 17}$

Sensitive Natural Communities and Critical Habitats

Definitions

Sensitive natural communities are vegetation types, associations, or sub-associations that support concentrations of special-status plant and/or wildlife species, are of relatively limited distribution, and/or are of particular value to wildlife. Currently, CDFW publishes the California Sensitive Natural Communities List online. Natural Communities are evaluated using NatureServe's Heritage Methodology, the same system used to assign global and State rarity ranks for plant and animal species in the CNDDB. Evaluation is done at both the Global (full natural range within and outside of California) and State (within California) levels resulting in a single G (global) and S (State) rank, ranging from 1 (very rare and threatened) to 5 (demonstrably secure). According to the CDFW Vegetation Program, Natural Communities with State ranks of S1-S3 and certain other specified associations are considered imperiled, and thus, potentially of special concern. Natural Communities with these ranks are generally addressed during CEQA environmental review with compensatory mitigation prescribed for impacts as applicable. Riparian areas are also considered sensitive natural communities by CDFW.

Critical habitat is a term used in the federal Endangered Species Act (ESA) and is defined as a specific geographic area (or areas) that contain features essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include an area that is not currently occupied by the species but that will be needed for its recovery. These areas provide notice to the public and land managers of the importance of these areas to the conservation of a listed species. Special protections and/or restrictions are possible in these areas when federal funding, permits, licenses, authorizations, or actions occur or are required.

¹⁷ Ibid

General Plan Area

The CDFW's CNDDB lists four sensitive natural communities that occur within the U.S. Geological Survey (USGS) *Montara Mountain* and the five surrounding 7.5-minute series quadrangles (*San Francisco South, Hunters Point, San Mateo, Half Moon Bay,* and *Woodside*). These natural communities include Northern Coastal Salt Marsh, Northern Maritime Chaparral, Serpentine Bunchgrass, and Valley Needlegrass Grassland. Of these sensitive natural communities, one community, Serpentine Bunchgrass, occurs within General Plan area.¹⁸ Serpentine Bunchgrass is located along the Skyline Blvd and I-280 corridor at the southernmost boundary of the General Plan area.

The USFWS Critical Habitat Mapper¹⁹ and the National Marine Fisheries Service (NMFS) West Coast Critical Habitat website²⁰ depict designated critical habitats in the vicinity of the General Plan area. Federally designated critical habitat for green sturgeon (*Acipenser medirostris*) occurs within the General Plan area in a drainage extending from the San Francisco Bay southwest into the city. Additionally, as shown on Figure 3.3-3, critical habitat for California red-legged frog is located immediately west of the city's boundary across I-280 and around Lower Crystal Springs Reservoir. Critical habitat for Bay checkerspot butterfly (*Euphydryas editha bayensis*) and marbled murrelet (*Brachyramphus marmoratus*) is also designated within the regional vicinity.²¹

Specific Plan Area

No sensitive natural communities or designated critical habitats are located within the Specific Plan area. ^{22, 23}

Special-Status Species

Definitions

For the purpose of this analysis, special-status species are those plants and animals listed, proposed for listing, or candidates for listing as threatened or endangered by the USFWS and/or NMFS under the ESA; those listed or proposed for listing as rare, threatened, or endangered by the CDFW under the California Endangered Species Act (CESA); plants listed as rare by the CDFW under the Native Plant Protection Act; and animals designated as "Species of Special Concern," "Fully Protected," or "Watch List" by the CDFW. Those plants ranked as California Rare Plant Rank (CRPR) 1 or 2 are typically regarded as rare, threatened, or endangered under CEQA by lead agencies and were considered as such in this EIR. The CRPR utilizes the following code definitions:

¹⁸ CDFW CNDDB, op. cit.

¹⁹ USFWS Critical Habitat Mapper, op. cit.

²⁰ National Marine Fisheries Service (NMFS). 2022. Critical Habitat [website]. https://www.fisheries.noaa.gov/national/endangered-species-conservation/critical-habitat#critical-habitat-designations,-maps,-and-gis-data (accessed March 2022).

²¹ USFWS Critical Habitat Mapper, op. cit.

²² Ibid

²³ CDFW CNDDB, op. cit.

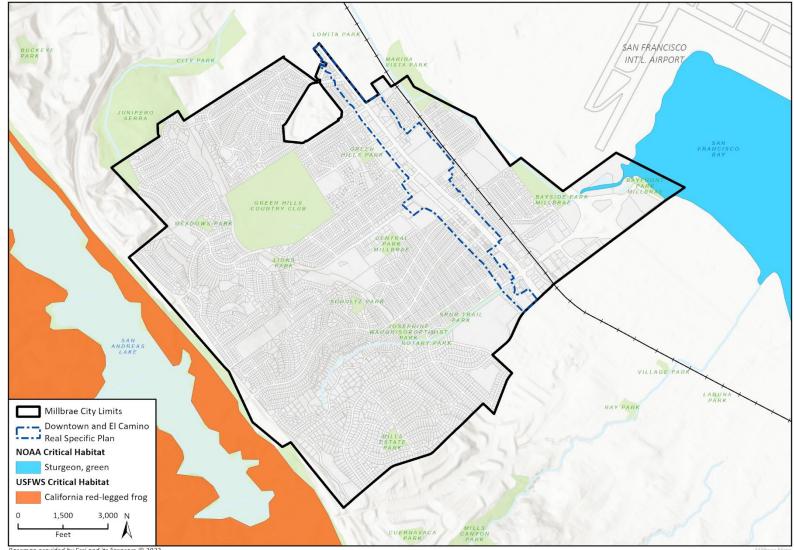


Figure 3.3-3 Critical Habitat in the General Plan Area

Basemap provided by Esri and its licensors © 2022 Additional data provided by USFWS, 2022; NOAA, 2021; City of Millbrae, 2021.

Fig 3.3-3 Critical Habitats in the

- List 1A = Plants presumed extinct in California
- List 1B.1 = Rare or endangered in California and elsewhere; seriously endangered in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
- List 1B.2 = Rare or endangered in California and elsewhere; fairly endangered in California (20-80 percent occurrences threatened)
- List 1B.3 = Rare or endangered in California and elsewhere, not very endangered in California (<20 percent of occurrences threatened, or no current threats known)
- List 2 = Rare, threatened or endangered in California, but more common elsewhere

CRPR List 3 species are "review list," and CRPR 4 species are considered "watch list" species. CRPR 3 and 4 species do not typically warrant analysis under CEQA except where they are part of a unique community, from the type locality, or designated as rare or significant by local governments, or where cumulative impacts could result in population–level effects. The CRPR 3 and 4 species reported from the region are not locally designated as rare or significant by the City of Millbrae or County of San Mateo General Plans and are not part of a unique community. Additionally, the City of Millbrae is not known to be the type locality for any ranked plant species. Therefore, potential impacts to CRPR 3 and CRPR 4 species were not considered in this analysis.

Species of Special Concern (SSC) is a category used by the CDFW for those species which are considered indicators of regional habitat changes or are considered to be potential future protected species. SSC do not have any special legal status except that which may be afforded by the Fish and Game Code. The SSC category is intended by the CDFW for use as a management tool to include these species into special consideration when decisions are made concerning the development of natural lands, and these species are considered sensitive as described under the CEQA Appendix G questions.

Queries of the USFWS IPaC ²⁴, the CDFW CNDDB ²⁵, and CNPS *Online Inventory of Rare, Threatened and Endangered Plants of California* were conducted.²⁶ These queries were conducted to obtain comprehensive information regarding state and federally listed species considered to have potential to occur within the General Plan area.

General Plan Area

The General Plan area is home to several species protected by federal and state agencies. Important animal species can be found in a variety of habitats in the General Plan area. The CNDDB,²⁷ CNPS,²⁸ and USFWS IPaC ²⁹ together list 92 special-status plant and animal species (61 plant species and 35 animal species [inclusive of special animals]) that occur or have potential to occur within the General Plan area. The status and habitat requirements of those species are presented in Appendix B as Tables B-1 and B-2, respectively.

SPECIAL-STATUS PLANTS

Based on the database and literature review, 61 special-status plant species are known to occur, or have potential to occur, in the General Plan area or the surrounding area. Several of these species

²⁷ CDFW CNDDB, op. cit.
²⁸ Ibid.

²⁴ USFWS IPaC, op. cit.

²⁵ CDFW CNDDB, op. cit.

²⁶ CNPS op. cit.

²⁰ Ibid

²⁹ USFWS IPaC, op. cit.

are associated sensitive natural communities including Serpentine Bunchgrass or riparian zones along creeks and waterways. Table B-1 in Appendix B lists these special-status plant species, their listing status, and their CRPR.

Special-status plants that are known or have potential to occur in the General Plan area and surrounding area can occupy a range of habitat types. Some are associated with chaparral, cismontane woodland, and broadleafed upland forests such as western leatherwood (*Dirca occidentalis*), Hillsborough chocolate lily (*Fritillaria biflora* var. *ineziana*), arcurate bush-mallow (*Malacothamnus arcuatus*), and woodland woollythreads (*Monolopia gracilens*). Others are associated with valley and foothill grasslands such as Franciscan onion (*Allium peninsulare* var. *franciscanum*), and white-rayed pentachaeta (*Pentachaeta bellidiflora*). Additionally, some special-status plant species, including congested-headed hayfield tarplant (*Hemizonia congesta* ssp. *congesta*), tolerate developed land cover types and may occur in fallow fields or along roadsides in urban areas. Most of the known special-status plant species occurrences are recorded in areas of open space including Junipero Serra County Park, Lions Park, and Josephine Waugh Soroptimist Park. Additionally, some of the species listed are not currently known to be found within the General Plan area limits but are regionally occurring species that could occur in the General Plan area.

SPECIAL-STATUS WILDLIFE

Based on the database and literature review, 35 special-status wildlife species are known, or have potential, to occur within the General Plan area or surrounding area. Table B-2 in Appendix B lists these special-status wildlife species, their listing status, and other status designations.

Special-status species are most likely to occur in undeveloped areas and open space areas. However, riparian areas that intersect urban development may also provide habitat and movement corridors for special-status species. The General Plan area and the surrounding area also provide habitat for avian wildlife, including several listed species and other special-status species. Several occurrences of California Ridgeway's rail (*Rallus obsoletus obsoletus*), and marbled murrelet (*Brachyramphus marmoratus*) have been recorded surrounding the General Plan area.

Ponds, wetlands, streams, and riparian areas may provide habitat for aquatic and semi-aquatic amphibians and reptiles, including California red-legged frog, San Francisco garter snake, and western pond turtle (*Emys marmorata*). Additionally, a drainage extending to the San Francisco Bay in the General Plan area may provide habitat for special-status fish species such as tidewater goby (*Eucyclogobius newberryi*), steelhead (*Oncorhynchus mykiss irideus* pop. 8), and green sturgeon.

Special-status bats such as pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), and big free-tailed bat (*Nyctinomops macrotis*) are State SSCs and have potential to occur within the General Plan area. In addition, although not listed in the CNDDB, mountain lions (*Puma concolor*) are legally classified as "specially protected species." In July 2019, the Center for Biological Diversity petitioned CDFW to list mountain lions as threatened under the CESA within a proposed evolutionarily significant unit (ESU) located in Southern California and along the central coast of California. In April 2020, CDFW found that listing of this ESU may be warranted and designated mountain lion within the ESU as a candidate species under CESA. Mountain lions inhabit diverse habitats across most of California and can be found wherever deer are present, which includes the foothills and mountainous areas within the southern Bay Area where the General Plan area is located.

Specific Plan Area

The Specific Plan area is completely developed with existing buildings and paved areas. Thus, the Specific Plan area generally does not offer suitable habitat for species protected by federal and state agencies. However, urban areas, including trees or shrubs in landscaped areas, or abandoned structures or buildings may serve as temporary nesting habitat for migratory birds or roosting habitat for special-status bats. Additionally, some special-status plant and wildlife species identified in the database queries listed above and presented in Appendix B, may occur in urban environments, and thus have some potential to occur in the Specific Plan Area.

Wildlife Movement Corridors

Wildlife movement corridors, or habitat linkages, are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as providing a linkage between foraging and denning areas, or they may be regional in nature. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Others may be dispersal corridors for young animals. A group of habitat linkages in an area can form a wildlife corridor network.

The habitats within the link do not necessarily need to be the same as the habitats that are being linked. Rather, the link merely needs to contain sufficient cover and forage to allow temporary inhabitation by ground-dwelling species. Typically, habitat linkages are contiguous strips of natural areas, though dense plantings of landscape vegetation can be used by certain disturbance-tolerant species. Depending upon the species using a corridor, specific physical resources (such as rock outcroppings, vernal pools, or oak trees) may need to be located within the habitat link at certain intervals to allow slower-moving species to traverse the link. For highly mobile or aerial species, habitat linkages may be discontinuous patches of suitable resources spaced sufficiently close together to permit travel along a route in a short period of time.

Wildlife movement corridors can be both large and small scale. Essential Connectivity Areas (ECAs) are mapped in the report, *California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California* and represent principal connections between Natural Landscape Blocks. ECAs are regions in which land conservation and management actions should be prioritized to maintain and enhance connectivity between areas of high ecological importance. ³⁰ ECAs are mapped based on coarse ecological condition indicators, rather than the needs of particular species and thus serve most of the species in each region. It is important to recognize that even areas outside of Natural Landscape Blocks and ECAs support important ecological values and should not be immediately discounted as lacking conservation value without further review.

General Plan Area

Most of the General Plan area is developed and urbanized and does not provide for wildlife movement corridors. Although the General Plan area is not located within an ECA, one ECA runs along the southern border of the city and connects the San Francisco Peninsula south to the Santa Cruz Mountain range. This mountain range may serve as a movement corridor for the state provisionally protected Southern California/Central Coast ESU of mountain lion. Small scale habitat corridors important to wildlife movement are also present within the General Plan area, many of

³⁰ Spencer, W.D., P. Beier, K. Penrod, K. Winters, C. Paulman, H. Rustigian-Romsos, J. Strittholt, M. Parisi, and A. Pettler. 2010. California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California. Prepared for California Department of Transportation, California Department of Fish and Game, and Federal Highways Administration.

which are not mapped as ECAs. Locally, Junipero Serra County Park, Lions Park, and Josephine Waugh Soroptimist Park may serve as smaller scale movement corridors for terrestrial species throughout the General Plan area, as they are mostly continuous vegetated areas connected by the city trails. However, these parks as well as most vegetated areas throughout the city are intersected by city streets and are highly disturbed by both human and domestic animal use and are surrounded by residential development. Additionally, drainages and riverine habitats such as South Lomita Canal throughout the city, provide potential fish and other aquatic wildlife movement habitat.

Specific Plan Area

The Specific Plan area is completely developed with existing buildings and paved areas. Thus, the Specific Plan area generally does not offer suitable habitat for wildlife movement, as it has been heavily altered throughout.

Important Farmland Resources

To characterize the environmental baseline for agricultural resources, Important Farmland Maps produced by the California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP) were reviewed.³¹

General Plan Area and Specific Plan Area

The General Plan area and Specific Plan area are designated as Urban and Built-Up Land and do not include identified forest land.³² No important farmlands, including prime or unique farmland or farmland of local importance, exist within the Millbrae City limits.

Productive Forestry Resources

Forestry resources include forestland, timberland, and timberland production zones. Definitions used for forest land and timberland are those found in the California Public Resources Code (PRC) Sections 12220(g) and 4789.2(g) and California Government Code (CGC) Section 51104(g). These codes define forestland, timberland, and timberland production zones.

General Plan Area and Specific Plan Area

The General Plan area and Specific Plan area are designated as Urban and Built-Up Land and do not include identified forest land.³³ No timberland or timberland production zones exist within the Millbrae City limits.

3.3.3 Regulatory Framework

Federal, State, and local authorities under a variety of statutes and guidelines share regulatory authority over biological resources. The primary authority for general biological resources lies within the land use control and planning authority of local jurisdictions, which in this instance includes the City of Millbrae and for areas outside City limits, the County of San Mateo. The CDFW is a trustee agency for biological resources throughout the State as defined in CEQA and has direct jurisdiction under the California Fish and Game Code, which includes, but is not limited to, resources protected by the State of California under the CESA. In addition, the local Regional Water Quality Control

³¹ California Department of Conservation (DOC). 2022. California Important Farmland Finder [map].

https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed March 2022).

³² Ibid.

³³ Ibid.

Board (RWQCB) is a responsible agency for waters of the State. Below are summaries of the federal, State, and local regulations or guiding documents that could apply. Since it was established under the Environmental Setting discussion above, that there are no agricultural or forestry resources within Millbrae, no agricultural or forestry regulations are included below.

Federal Regulations

Federal Endangered Species Act

Under the ESA, authorization is required to "take" a listed species. Take is defined under Section 3 of the ESA as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Under federal regulation (50 Code of Federal Regulations [CFR] Sections 17.3, 222.102); "harm" is further defined to include habitat modification or degradation where it would be expected to result in death or injury to listed wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Critical habitat is a specific geographic area(s) that is essential for the conservation of a threatened or endangered species and that may require special management and protection. Critical habitat may include an area that is not currently occupied by the species but that will be needed for its recovery. Section 7 of the ESA outlines procedures for federal interagency cooperation to conserve federally listed species and designated critical habitat.

Section 7(a)(2) of the ESA and its implementing regulations require federal agencies to consult with USFWS or NMFS to ensure that they are not undertaking, funding, permitting, or authorizing actions likely to jeopardize the continued existence of listed species, or result in the destruction or adverse modification of critical habitat. For projects where federal action is not involved and take of a listed species may occur, the project proponent may seek to obtain an incidental take permit under Section 10(a) of the ESA. Section 10(a) allows USFWS to permit the incidental take of listed species if such take is accompanied by a Habitat Conservation Plan (HCP) that includes components to minimize and mitigate impacts associated with the take.

The USFWS and NMFS share responsibility and regulatory authority for implementing the ESA (7 United States Code [USC] Section 136, 16 USC Section 1531 et seq.).

Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act

The Migratory Bird Treaty Act (MBTA) authorizes the Secretary of the Interior to regulate the taking of migratory birds. The act provides that it is unlawful, except as permitted by regulations, "to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, possess, [...] any migratory bird, or any part, nest, or egg of any such bird" (16 USC Section 703(a)). The Bald and Golden Eagle Protection Act is the primary law protecting eagles, including individuals and their nests and eggs. The USFWS implements the MBTA (16 USC Section 703-711) and the Bald and Golden Eagle Protection Act (16 USC Section 668). Under the Bald and Golden Eagle Protection Act (16 USC Section 668). Under the Bald and Golden Eagle Protection Act (16 USC Section 668). Under the Bald and Golden Eagle Protection Act of bald eagles and golden eagles.

Magnuson-Stevens Fishery Conservation and Management Act

The Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) regulates marine fisheries in U.S. federal waters. The Magnuson-Stevens Act was first passed in 1976 and was revised in 1996 and 2007. The purpose of the Magnuson-Stevens Act is to provide long-term biological and economic sustainability of U.S. marine fisheries.

The NMFS has regulatory authority for implementing the Magnuson-Stevens Act. The NMFS requires regional fishery management councils to develop Fisheries Management Plans (FMPs) specific to their regions, fisheries, and fish stocks. For waters off the U.S. West Coast, the Pacific Fishery Management Council has developed four FMPs, which are implemented through fisheries regulations for coastal pelagic species, groundfish species, highly migratory species, and salmon species. These FMPs also identify Essential Fish Habitat, which is broadly defined as those waters and substrate necessary to fish for spawning, breeding, feeding or growth to maturity.

Section 10 of the River and Harbors Act

Section 10 of the Rivers and Harbors Act of 1899 requires authorization from the Secretary of the Army, acting through the USACE, for the construction of any structure in or over any navigable water of the United States. Regulated activities include dredging or disposal of dredged materials, excavation, filling, re-channelization and construction of any structure or any other modification of a navigable water of the United States.

Clean Water Act (CWA)

Under Section 404 of the CWA, the USACE, with U.S. Environmental Protection Agency (EPA) oversight, has authority to regulate activities that result in discharge of dredged or fill material into wetlands or other "waters of the United States" (WOTUS). Perennial and intermittent creeks are considered WOTUS if they are hydrologically connected to other jurisdictional waters. In achieving the goals of the CWA, the USACE seeks to avoid adverse impacts and offset unavoidable adverse impacts on existing aquatic resources. Any discharge of dredged or fill material into jurisdictional wetlands or other jurisdictional WOTUS would require a Section 404 permit from the USACE prior to the start of work. Typically, when a project involves impacts to WOTUS, the goal of no net loss of wetlands is met by compensatory mitigation; in general, the type and location options for compensatory mitigation should comply with the hierarchy established by the USACE/EPA 2008 Mitigation Rule (in descending order): (1) mitigation banks; (2) in-lieu fee programs; and (3) permittee-responsible compensatory mitigation. Also, in accordance with Section 401 of the CWA, applicants for a Section 404 permit must obtain water quality certification from the SWRCB or appropriate RWQCB.

State Regulations

California Endangered Species Act

CESA (California Fish and Game Code Section 2050 et seq.) prohibits take of State-listed threatened and endangered species without a CDFW incidental take permit. Take under CESA is restricted to direct harm of a listed species and does not prohibit indirect harm by way of habitat modification.

Protection of fully protected species is described in California Fish and Game Code Sections 3511, 4700, 5050 and 5515. These statutes prohibit take or possession of fully protected species. Incidental take of fully protected species may be authorized under an approved Natural Communities Conservation Plan (NCCP).

Natural Community Conservation Planning Act

The Natural Communities Conservation Planning Act was established by the California Legislature, is directed by the CDFW, and is implemented by the State, as well as public and private partnerships to protect habitat in California. The Natural Communities Conservation Planning Act takes a regional

approach to preserving habitat. An NCCP identifies and provides for the regional protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. Once an NCCP has been approved, CDFW may provide take authorization for all covered species, including fully protected species, Section 2835 of the California Fish and Game Code.

California Fish and Game Code Sections 3503, 3503.5 and 3511

California Fish and Game Code Sections 3503, 3503.5 and 3511 describe unlawful take, possession, or destruction of birds, nests, and eggs. Fully protected birds (California Fish and Game Code Section 3511) may not be taken or possessed except under specific permit. Section 3503.5 protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs.

California Native Plant Protection Act

The CDFW also has authority to administer the Native Plant Protection Act (NPPA) (California Fish and Game Code Section 1900 et seq.). The NPPA requires the CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare. Under Section 1913(c) of the NPPA, the owner of land where a rare or endangered native plant is growing is required to notify the CDFW at least 10 days in advance of changing the land use to allow for salvage of the plant(s).

Section 1600 et seq. of the California Fish and Game Code

Section 1600 et seq. of the California Fish and Game Code prohibits, without prior notification to CDFW, the substantial diversion or obstruction of the natural flow of, or substantial change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake. In order for these activities to occur, the CDFW must receive written notification regarding the activity in the manner prescribed by the CDFW and may require a lake or streambed alteration agreement. Lakes, ponds, perennial, and intermittent streams and associated riparian vegetation, when present, are subject to this regulation.

Porter-Cologne Water Quality Control Act

Pursuant to Section 401 of the CWA, projects that apply for a USACE permit for discharge of dredged or fill material must also obtain water quality certification under Section 401 from the RWQCB. Additionally, the SWRCB and each of nine local RWQCBs have jurisdiction over "waters of the State" pursuant to the Porter-Cologne Water Quality Control Act, which are defined as any surface water or groundwater, including saline waters, within the boundaries of the State. The SWRCB has issued general Waste Discharge Requirements regarding discharges to "isolated" waters of the State (Water Quality Order No. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the USACE to be Outside of Federal Jurisdiction). The local RWQCB implements this general order for isolated waters not subject to federal jurisdiction.

The CWA and associated federal regulations (Title 40 of the CFR 123.25(a)(9), 122.26(a), 122.26(b)(14)(x) and 122.26(b)(15)) require nearly all construction site operators engaged in clearing, grading, and excavating activities that disturb one acre or more, including smaller sites in a larger common plan of development or sale, to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit for their stormwater discharges, and develop a Storm

Water Pollution Prevention Plan (SWPPP). The NPDES Program is a federal program which has been delegated to the State of California for implementation through the SWRCB and RWQCBs.

California Code of Regulations (Wetlands and Waters Definition)

The State Water Board indicates that no single accepted definition of wetlands exists at the State level, and that RWQCBs may have different requirements and levels of analysis with regard to the issuance of water quality certifications. Generally, an area is a wetland if, under normal circumstances:

- 1. the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both;
- 2. the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and
- 3. the area's vegetation is dominated by hydrophytes or the area lacks vegetation.

Under California State law, waters of the State means "any surface water or groundwater, including saline waters, within the boundaries of the state." As such, water quality laws apply to both surface water and groundwater. After the U.S. Supreme Court decision in *Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers* (53 USC 159), the Office of Chief Counsel of the State Water Board released a legal memorandum confirming the State's jurisdiction over isolated wetlands. The memorandum stated that under the California Porter-Cologne Water Quality Control Act, discharges to wetlands and other waters of the State are subject to State regulation, and this includes isolated wetlands. In general, the State Water Board regulates discharges to isolated waters in much the same way as it does for waters of the United States, using Porter-Cologne rather than CWA authority.

Local Regulations

Millbrae Municipal Code

Chapter 8.60 of the Millbrae Municipal Code (MMC) is known as the tree protection and urban forestry program. This chapter establishes policies, regulations, and standards necessary to ensure that the City will continue to realize the benefits provided by its urban forest. This chapter adopts the City's Master Tree Plan prescribing regulations on the care, preservation, and proliferation of street trees within the City. Under this chapter, the planting, pruning, removal, alteration, or any other work on a street tree without an authorized permit is prohibited. It makes property owners responsible for the care and maintenance of street trees fronting upon or abutting their property, including watering as needed. In addition, the City requires a permit for the removal or alteration of street trees.

3.3.4 Impacts and Mitigation Measures

Significance Criteria

The City of Millbrae utilizes the following 2022 CEQA Guidelines Appendix G significance criteria questions related to Biological Resources and Agriculture and Forestry Resources.

Would the 2040 General Plan or Specific Plan:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?
- c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?
- g) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?
- h) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- i) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timber Production?
- j) Result in the loss of forest land or conversion of forest land to non-forest use?
- k) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

Approach to Analysis

Environmental impacts to biological, agricultural, and forestry resources have been assessed using impact significance criteria from federal, State, and local regulations. CEQA, Chapter 1, Section 21001(c) states that it is the policy of the State of California to "prevent the elimination of fish and wildlife species due to man's activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities." Environmental impacts relative to biological, agricultural, and forestry resources have been assessed using impact significance criteria set forth in the CEQA Guidelines and federal, State, and local plans, regulations, and ordinances.

Biological Resources

The impact analysis is based on available literature regarding the existing biological resources in the General Plan area. Data used for this analysis are summarized in Section 3.3.1.

Rincon Biologists evaluated impacts on biological resources based on the likelihood that specialstatus species, sensitive habitats, wildlife corridors, and protected trees are present within the plan areas, and the likely effects of construction or operation on these resources. For the purposes of this EIR, the word "substantial" as used in the significance thresholds above is defined by the following three principal components:

- Magnitude and duration of the impact (e.g., substantial/not substantial),
- Uniqueness of the affected resource (rarity), and
- Susceptibility of the affected resource to disturbance.

Agricultural and Forestry Resources

This impact analysis is based on available literature regarding the existing agricultural and forestry resources in the General Plan area. The primary source of information reviewed to evaluate impacts in this area was the DOC FMMP database to search for documented areas of important farmland, Williamson contracts, and forestry lands. ³⁴

EIR Scoping Comments Consideration

No comments relevant to CEQA were received in response to the EIR NOP specific to biological, agricultural, and forestry resources that need to be addressed in the impacts discussion.

Specific Threshold of Significance

For purposes of this analysis, the following thresholds are used to evaluate the significance of Biological Resources and Agriculture and Forestry Resources impacts resulting from implementation of the proposed plans.

- Result in direct take or habitat removal or alteration for candidate, sensitive, or special-status species.
- Adversely affect any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS.
- Remove, fill, or damage a federally protected wetland.
- Interrupt fish movement in an aquatic channel or impede terrestrial movement via a land corridor.
- Remove, damage, or replace trees designated as protected by the City of Millbrae Tree Ordinance.
- Conflict with the provisions of an applicable habitat conservation plan.
- Result in conversion of agricultural resources to non-agricultural resources.
- Result in conversion of forestry resources to non-forestry resources.

³⁴ DOC, op. cit.

Impact Evaluation

Effects on Special-status Species

Significance Criterion a:	Would the plans have a substantial adverse effect, either directly or
	through habitat modifications, on any species identified as a candidate,
	sensitive, or special status species in local or regional plans, policies, or
	regulations, or by the California Department of Fish and Wildlife or U.S.
	Fish and Wildlife Service?

Impact BIO-1 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND/OR SPECIFIC PLAN COULD RESULT IN DIRECT OR INDIRECT IMPACTS TO SPECIAL-STATUS SPECIES OR THEIR ASSOCIATED HABITATS INCLUDING IMPACTS TO MIGRATORY BIRD NEST SITES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Construction

2040 GENERAL PLAN

As indicated above in Table 3.3-1, most of the General Plan area is developed and does not provide habitat for the special-status species reported or known to occur in or near to Millbrae. Areas that may provide habitat for special-status species are primarily located in the open space and undeveloped areas of the General Plan area and the marshes and wetlands adjacent to the Bay in the eastern part of the General Plan area.

As shown in Tables B-1 and B-2 in Appendix B, special-status species with the potential to occur in and near the General Plan area include, for example, California red-legged frog, San Francisco garter snake, western pond turtle, California Ridgeway's rail, and marbled murrelet. Generally, these species are associated with waterways and wetlands as well as open space and thus would most likely be found at the eastern limit of the General Plan area along the Bayfront Park, in wetlands located along Highway 101 at South Lomita Canal, and to the northern extent of the General Plan area reaching to Junipero Serra County Park. Federally designated critical habitat for green sturgeon occurs within the General Plan area in a drainage extending into the San Francisco Bay to the northeast. Additionally, critical habitat for California red-legged frog is located immediately west of the General Plan area boundary across I-280 and around Lower Crystal Springs Reservoir. Specialstatus plant species with the potential to occur in the General Plan area include, for example, San Francisco collinsia (*Collinsia multicolor*), San Francisco owl's clover (*Triphysaria floribunda*), whiterayed pentachaeta (*Pentachaeta bellidiflora*), and Franciscan onion (*Allium peninsulare* var. *franciscanum*). These species would be expected to occur within open space areas of Junipero Serra County Park on the fringes of the General Plan area within vegetative habitat.

One special-status plant community, Serpentine Bunchgrass, occurs within the General Plan area. Serpentine Bunchgrass is located along the Skyline Blvd and I-280 corridor at the southernmost boundary of the General Plan area. Additionally, riparian habitat occurs along Mills Creek and other drainages in the General Plan area.³⁵

The 2040 General Plan would facilitate infill development and redevelopment within the Millbrae City limits. These areas are currently developed with residential and non-residential uses and do not provide habitat suitable for special-status species described above. The 2040 General Plan

³⁵ USFWS NWI Wetlands Mapper, op. cit.

designates the existing wetlands at the eastern extent of the General Plan area, next to Highway 101 and the land at Bayfront Park along the San Francisco Bay, as Parks, Recreation, and Open Space. The land along Mills Creek extending south from Junipero Serra County Park through the General Plan area is also designated as Parks, Recreation, and Open Space. This land use designation would prevent substantial development of the habitat that these open space, wetlands, and shoreline areas provide.

The 2040 General Plan would not include changes to existing Parks, Recreation and Open Space land use designations, including along creeks and waterways in the General Plan area. Therefore, the 2040 General Plan would not facilitate permanent development in riparian vegetation along these creeks and drainages. Because the development facilitated by the 2040 General Plan would occur as redevelopment and infill within developed areas, existing roads, water, and sewer are already in place and would minimize the need for construction of new utilities and infrastructure. However, the 2040 General Plan increases the allowable density that could be constructed on some infill and redevelopment sites within the General Plan area, which could require upgraded utilities. The construction of these upgraded facilities could require work within riparian vegetation along creeks and drainages in the General Plan area, resulting in potential temporary riparian and aquatic habitat impacts. These habitats could support several special-status species, such as California red-legged frog and/or San Francisco garter snake. Additionally, development facilitated by the 2040 General Plan could impact isolated trees and pockets of vegetation in the urbanized areas of the General Plan area. These trees and isolated pockets could provide habitat for special-status species, including migratory nesting birds.

The development facilitated under the 2040 General Plan would be subject to the provisions of the various federal and State natural resources regulations and their respective permitting processes. Additionally, the 2040 General Plan contains goals and policies that call for the preservation and protection of natural resources and the managed production of natural resources. These goals and policies, listed below, would reduce impacts to special-status species and their habitats.

Goal NRC-1 Protect, enhance, and restore undeveloped open space areas and biological resources so they can be sustained and remain viable

- **Policy NRC-1.2 Permanent Open Space Dedication.** The City shall require permanent dedication of open space areas with habitat, visual, recreational, or archaeological value as a condition of new development approval. These areas should be owned and maintained by private parties unless they are appropriate for use as trails or other public-access uses.
- **Policy NRC-1.7 Open Space Improvement.** The City shall strive to ensure that any improvements to open space areas maintain the open space and do not adversely impact habitats, views, and other open space resources.
- **Policy NRC-1.10** Habitat Protection. The City shall protect sensitive biological resources, including habitats of State and Federally designated sensitive, rare, threatened, and endangered plant, fish, and wildlife species from urban development and incompatible land uses through analysis in the CEQA and permitting process. If new development results in impacts to any of these resources, loss of habitat should be fully compensated on-site whenever it is feasible to do so. If off-site mitigation is necessary, it should occur within the city of Millbrae whenever it is feasible to do so.

Policy NRC-1.11 Development Setbacks. The City shall protect lands adjacent to sensitive habitat areas as public or private permanent open space through dedication or easements. The City shall ensure new development adjacent to such areas provides adequate building setbacks to buffer against potential impacts, with adequate access easements to allow for necessary open space maintenance.

The policies listed above would prevent loss of special-status wildlife habitat in the open space areas throughout the General Plan area. Policies NRC-1.2 and 1.7 would require permanent open space dedication and protection such that urban development does not adversely impact habitats or open space resources. Policy NRC-1.11 would ensure that development is setback from sensitive habitat areas by requiring new development adjacent to these areas be set back at an appropriate buffer to avoid impacts and maintain open space access. Additionally, Policy NRC-1.10 requires that the City protect sensitive biological resources such as habitats of State and federally designated sensitive, rare, threatened, and endangered plant, fish, and wildlife species from urban development and incompatible land uses. Additionally, Policy NRC-1.10 requires impacts to sensitive habitats resulting from development to be fully compensated on-site, if it is feasible to do so. If on-site compensation is not possible, then compensation will should within the city of Millbrae if it is feasible to do so.

The requirement for special-status habitat and species protection as well as plans for adequate buffering of development outside of sensitive biological areas prior to development would ensure that potential special-status species that could be impacted by future development would be identified and potential impacts would be reduced or avoided. Therefore, implementation of these policies would avoid potential direct impacts to sensitive species identified above under Section 3.3.1.d.

While the policies above would prevent impacts to large tracts of open space that provide habitat for special-status species, as with most urbanized environments, landscape features within the urbanized areas of the City, such as trees, shrubs, herbaceous plants, and parklands, could serve as temporary habitats for nesting migratory birds. Migratory bird species may use the General Plan area for nesting during the breeding season and are protected under the California Fish and Game Code and MBTA. Construction-related activities such as vegetation removal, building demolition and/or relocation, grading, materials laydown, access, and infrastructure improvements, and building construction, could result in the disturbance of nesting migratory birds. The most identifiable potential direct impact to migratory bird species would involve the removal of vegetation, particularly trees and landscaping shrubs that may serve as perching or nesting sites for migratory birds. These adverse effects on listed or special-status bird species would represent a potentially significant impact, and implementation of Mitigation Measure BIO-1 would be required for future projects where mature trees and other habitat are present and construction activities are scheduled from early spring to late summer.

Special-status bats such as pallid bat, Townsend's big-eared bat, and big free-tailed bat are State SSCs and have potential to occur within the General Plan area. Pallid bats are found in grasslands, shrublands, woodlands, and forests, and may roost in trees or buildings. Townsend's big-eared bat and big free-tailed bats are found in a wide variety of habitats and may roost in abandoned buildings or large trees. Bats prefer open areas or areas under a tree canopy for foraging, and often roost near water. Although Millbrae is primarily developed, large trees, abandoned structures and buildings in the city provide suitable roosting habitat for special-status bat species. Disturbance of maternity roosts from construction activities, resulting in roost destruction or abandonment, would be a potentially significant impact to bat species and would potentially constitute violations of the California Fish and Game Code. Adverse effects on special-status bats would be a potentially

significant impact. However, Mitigation Measure BIO-2 would be required for future 2040 General Plan projects where trees, abandoned structures or other habitat for roosting bats is present and construction activities may occur during seasonal periods of bat activity. Therefore, 2040 General Plan construction impacts related to special-status species would be less than significant with mitigation.

SPECIFIC PLAN

As described above under Section 3.3.2, *Environmental Setting*, the Specific Plan area is completely developed and the only vegetation present are some scattered street trees lining city streets and El Camino Real, and landscaped ornamental plantings near buildings. As such, the Specific Plan area generally does not offer suitable habitat for plant or wildlife species and has been heavily altered throughout. However, urban areas, including trees or shrubs in landscaped areas, or abandoned structures or buildings may serve as temporary nesting habitat for migratory birds or roosting habitat for special-status bats.

Although there are no specific development projects associated with the Specific Plan, implementation of the Specific Plan would guide development in the Specific Plan area. New residential and commercial uses would be implemented by new development, especially in the areas identified as opportunity sites in the Specific Plan, where existing land use would change from General Commercial to allow for mixed uses, including residential. Development facilitated by the Specific Plan may include vegetation removal, site preparation, demolition, and construction activities which may result in impacts to nesting migratory birds protected under the California Fish and Game Code and MBTA. Although the Specific Plan area is primarily developed, large trees, abandoned structures and buildings in the city provide suitable roosting habitat for special-status bat species. Disturbance of maternity roosts from construction activities, resulting in roost destruction or abandonment, would represent a potentially significant impact to bat species and would potentially constitute violations of the CFGC. Adverse effects on special-status bats and nesting birds would represent a potentially significant impact. However, implementation of Mitigation Measures BIO-1 and BIO-2 would reduce potential Specific Plan impacts related to nesting bird and roosting bats, habitat for special-status, locally important species, and nesting birds by requiring pre-construction surveys and avoidance of nesting birds and roosting bats. Therefore, Specific Plan construction impacts related to special-status species would be less than significant with mitigation.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Given that potential impacts to special status species would occur during construction either directly or indirectly related to habitat modification, there would be no 2040 General Plan or Specific Plan operational impacts related to biological resources.

Mitigation Measures

MITIGATION MEASURE BIO-1 PRE-CONSTRUCTION BIRD SURVEYS, AVOIDANCE, AND NOTIFICATION

For construction activities initiated during the bird nesting season (February 1 – September 15) involving removal of vegetation that could potentially serve as habitat for special-status bird species or other nesting bird habitat, including abandoned structures and other man-made features, a pre-

construction nesting bird survey shall be conducted no more than 14 days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot and shall include a buffer around the construction site at a distance determined by a qualified biologist. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in California Bay Area communities (i.e., qualified biologist). If nests are found, an avoidance buffer shall be determined by a qualified biologist dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site. The buffer shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s) shall be prepared by a qualified biologist and shall be submitted to the City prior to the commencement of construction activities.

Future project site plans shall include a statement acknowledging compliance with the federal MBTA and California Fish and Game Code that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to September 15 and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.

MITIGATION MEASURE BIO-2 ROOSTING BATS SURVEYS AND AVOIDANCE PRIOR TO REMOVAL

Prior to the removal or alteration of trees and structures that may serve as roosting habitat for special-status bat species, a qualified biologist shall conduct a focused survey of all trees and structures to be removed or impacted by construction activities to determine whether active roosts of special-status bats are present on site. Tree or structure removal shall be planned for either the spring or the fall and timed to ensure both suitable conditions for the detection of bats and adequate time for tree and/or structure removal to occur during seasonal periods of bat activity exclusive of the breeding season, as described below. Trees and/or structures containing suitable potential bat roost habitat features shall be clearly marked or identified. If no bat roosts are found, the results of the survey will be documented and submitted to the City within 30 days of the survey, after which no further action will be required.

If day roosts are present, the biologist shall prepare a site-specific roosting bat protection plan to be implemented by the contractor following the City's approval. The plan shall incorporate the following guidance as appropriate:

- When possible, removal of trees/structures identified as suitable roosting habitat shall be conducted during seasonal periods of bat activity, including the following:
 - a) Between September 1 and about October 15, or before evening temperatures fall below 45 degrees Fahrenheit and/or more than 0.5 inch of rainfall within 24 hours occurs.
 - b) Between March 1 and April 15, or after evening temperatures rise above 45 degrees Fahrenheit and/or no more than 0.5 inch of rainfall within 24 hours occurs.

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- If a tree /structure must be removed during the breeding season and is identified as potentially containing a colonial maternity roost, then a qualified biologist shall conduct acoustic emergence surveys or implement other appropriate methods to further evaluate if the roost is an active maternity roost. Under the biologist's guidance, the contractor shall implement measures that consist of (or exceed) the following:
 - a) If it is determined that the roost is not an active maternity roost, then the roost may be removed in accordance with the other requirements of this measure.
 - b) If it is found that an active maternity roost of a colonial roosting species is present, the roost shall not be disturbed during the breeding season (April 15 to August 31).
- Tree removal procedures shall be implemented using a two-step tree removal process. This method is conducted over two consecutive days and works by creating noise and vibration by cutting non-habitat branches and limbs from habitat trees using chainsaws only (no excavators or other heavy machinery) on day one. The noise and vibration disturbance, together with the visible alteration of the tree, is very effective in causing bats that emerge nightly to feed to not return to the roost that night. The remainder of the tree is removed on day two.
- Prior to the demolition of vacant structures within the project site, a qualified biologist shall conduct a focused habitat assessment of all structures to be demolished. The habitat assessment shall be conducted enough in advance to ensure the commencement of building demolition can be scheduled during seasonal periods of bat activity (see above), if required. If no signs of day roosting activity are observed, no further actions will be required. If bats or signs of day roosting by bats are observed, a qualified biologist will prepare specific recommendations such as partial dismantling to cause bats to abandon the roost, or humane eviction, both to be conducted during seasonal periods of bat activity, if required.
- If the qualified biologist determines a roost is used by a large number of bats (large hibernaculum), bat boxes shall be installed near the project site. The number of bat boxes installed will depend on the size of the hibernaculum and shall be determined through consultation with CDFW. If a maternity colony has become established, all construction activities shall be postponed within a 500-foot buffer around the maternity colony until it is determined by a qualified biologist that the young have dispersed. Once it has been determined that the roost is clear of bats, the roost shall be removed immediately.

Level of Significance

Less than significant with mitigation

Effects on Sensitive Natural Communities

Significance Criterion b:	Would the plans have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?
Significance Criterion c:	Would the plans have a substantial adverse effect on State or federally protected wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact BIO-2 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND/OR SPECIFIC PLAN COULD ADVERSELY IMPACT RIPARIAN HABITAT, OTHER SENSITIVE NATURAL COMMUNITIES, OR PROTECTED WETLANDS IN THE GENERAL PLAN AREA AND/OR SPECIFIC PLAN AREA. IMPLEMENTATION OF FEDERAL, STATE, AND LOCAL REGULATIONS AND POLICIES WOULD ENSURE RIPARIAN HABITAT AND WETLANDS ARE NOT SIGNIFICANTLY IMPACTED. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN

Riparian habitats have been recorded in and around the General Plan area. According to the NWI database (see Figure 3.3-2), areas of freshwater emergent wetlands occur in the eastern part of the General Plan area in undeveloped areas alongside Highway 101.³⁶ Additionally, several riverine features occur throughout the General Plan area including those at Junipero Serra County Park and in drainage canals adjacent to Highway 101. Development facilitated by the 2040 General Plan that would be located near or be bisected by waterways and other tributaries and drainages throughout the General Plan area, would be potentially subject to USACE, CDFW, and RWQCB permitting requirements.

Most of the development facilitated by the 2040 General Plan would be located on infill sites that are already developed with structures and/or parking and are not proximate to wetlands or waterways. Because these areas are urbanized and currently developed, they are unlikely to contain jurisdictional wetlands or other surface waters and associated riparian vegetation zones. However, it is possible that wetlands or streams occur in areas that could be developed based on the land use designations in the 2040 General Plan. Additionally, the infill development facilitated by the 2040 General Plan would increase density in some areas, which could require upgraded utilities or stormwater drainage. The construction of these upgraded facilities could require work, including dredge or fill, within jurisdictional wetlands and streams and could require ground disturbance in riparian habitat associated with these wetlands and streams. For development that would occur in these areas, a jurisdictional delineation would be required in accordance with CWA Section 404. Therefore, any proposed development in areas identified as jurisdictional waters and/or wetlands, streambed/banks, or riparian vegetation would be subject to the permit requirements of the USACE, RWQCB, and CDFW, pursuant to Section 404 of CWA and the Porter-Cologne Water Quality Control Act. Actual jurisdictional areas are determined by the State and federal authorities at the time that permits are requested.

³⁶ USFWS NWI Wetlands Mapper, op. cit.

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Reasonably foreseeable development within or adjacent to sensitive habitats could result in potential direct impacts through removal of vegetation, filling of wetland habitat, runoff of pollutants into riparian habitats or wetlands, compaction of soils, and/or indirectly through dust and vegetation thinning. The issuance of a grading permit by the Director of Public Works for ministerial and discretionary projects requires obtaining other permits required by State or federal agencies. These include but are not limited to streambed alteration permits from the CDFW and permits for grading in the vicinity of wetlands and certain watercourses from the USACE. These permit clearances may also be required as conditions of approval for grading work to commence. Approval of permits also requires findings that the proposed grading will not result in erosion, stream sediment, or other adverse off-site effects to riparian habitat.

On future project sites one acre or larger, implementation of the required Stormwater Pollution Prevention Plan Best Management Practices, in accordance with the NPDES construction general permit, during project construction would reduce the potential for eroded soil and any contaminants attached to that soil to contaminate a waterbody following a storm event. Additionally, MMC Section 9.45.260 provides design standards to address erosion and sedimentation. Future developments facilitated by the 2040 General Plan would employ erosion and stormwater control measures as outlined in the MMC Chapter 8.70, *Storm Water Management and Discharge Control*, to reduce, capture, and treat stormwater pollution to reduce impacts to waterways, including water quality. Impacts related to drainage and pollution are further discussed in Section 3.8, *Hydrology and Water Quality*.

The 2040 General Plan contains goals and policies that would further reduce impacts to riparian and wetland habitats. The following goal and policies address development in or near riparian habitat:

Goal NRC-2 Improve water quality by protecting surface water resources and restoring creeks and rivers to their natural state.

- Policy NRC-2.1 San Mateo Countywide Water Pollution Prevention Program. The City shall continue to participate in the San Mateo Countywide Water Pollution Prevention Program.
- Policy NRC-2.2 Storm Water National Pollutant Discharge Elimination System (NPDES). In coordination with the San Mateo City and County Association of Governments, the City shall continue to implement measures consistent with the Municipal Regional Stormwater NPDES Permit.
- **Policy NRC-2.3 Best Management Practices to Reduce Water Pollution**. The City shall require implementation of Best Management Practices consistent with the Municipal Regional Stormwater NPDES Permit to reduce non-point source pollutants in the drainage system.
- **Policy NRC-2.4 Green Infrastructure.** The City shall ensure all new developments implement green infrastructure, per the City's Green Infrastructure Plan, adopted by City Council in September 2019. Development, including public improvement projects, shall include "green" stormwater collection and treatment and employ Low Impact Development (LID) features that minimize surface water runoff and pollutants. LID features may include bioretention systems, swales, green roofs, infiltration systems, and permeable pavers.

Implementation Program A. **Creek Daylighting and Restoration Study**. The City shall prepare a Creek Daylighting and Restoration Study that will identify specific actions to maintain and restore creeks and streams to a more natural state. Based on findings from the Study, the City shall prepare and submit recommendations to the City Council on priority actions to maintain and restore creeks and streams

Implementation of these goals and policies, as well as Policy NRC-1.10 and NRC-1.11 described under Impact BIO-1, would reduce direct impacts to riparian habitat during construction and operation by reducing direct and indirect modifications to creeks, embankments, and other waterways in the General Plan area. Furthermore, if jurisdictional waters occur on any site identified by the 2040 General Plan for development, a jurisdictional delineation and permits issued by the relevant State and/or federal authorities (CDFW, RWQCB, and USACE) would be required that would address potential impacts to those waters. Additionally, under Implementation Program A, the City is required to identify specific actions to maintain and restore creeks and streams within the General Plan area, thus further improving these habitats for the future. Adherence to State and federal regulations, the MMC, and implementation of proposed 2040 General Plan goals and polices would result in a 2040 General Plan sensitive natural community impact that is less than significant.

SPECIFIC PLAN

The Specific Plan area is completely developed with existing buildings and paved areas. As shown on Figure 3.3-2 above, no riparian habitats, sensitive natural communities, or protected wetlands occur within the Specific Plan area. Additionally, there are no specific development projects associated with the Specific Plan although implementation of the plan would guide development in the Specific Plan area. None of the programs, policies or rezones that would be adopted as part of the Specific Plan area would allow ground disturbance or development within or in proximity to any riparian habitats, sensitive natural communities, and/or State or federally protected wetlands. In addition, as discussed in Section 3.3.2, *Regulatory Setting*, several federal, State, and local regulations protect wetlands and sensitive habitats from adverse effects from development, including the CWA and numerous 2040 General Plan polices. As implementation of the Specific Plan would not increase the likelihood for development that could affect sensitive natural communities including riparian habitats or protected wetlands, no Specific Plan sensitive natural community impact would occur.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Given that potential impacts to riparian habitats and wetlands would occur during construction either directly via fill or indirectly related to habitat modification, there would be no 2040 General Plan or Specific Plan operational impacts related to sensitive natural communities.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Effects on Wildlife Movement Corridors

Significance Criterion d:	Would the plans interfere substantially with the movement of any native
	resident or migratory fish or wildlife species or with established native
	resident or migratory wildlife corridors, or impede the use of native
	wildlife nursery sites?

Impact BIO-3 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN WOULD AVOID IMPACTS TO WILDLIFE MOVEMENT CORRIDORS BY CONSERVING OPEN SPACE AREAS IN THE GENERAL PLAN AREA, AS DIRECTED BY POLICIES IN THE 2040 GENERAL PLAN. DEVELOPMENT FACILITATED BY THE SPECIFIC PLAN WOULD NOT BE PLACED IN ANY AREAS USED BY WILDLIFE AS MOVEMENT CORRIDORS, AS THE SPECIFIC PLAN AREA IS ENTIRELY DEVELOPED. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN

Most of the General Plan area is developed and urbanized and does not provide for wildlife movement corridors. Wildlife movement corridors in the General Plan area are generally limited to riparian corridors and creeks that connect areas of open space to the San Francisco Bay. These creeks may be used by migratory fish and riparian corridors and other undeveloped areas in the city may provide corridors for wildlife movement, including migratory birds and western pond turtle, San Francisco garter snake, and California red-legged frog when migrating to aquatic breeding habitat and during juvenile dispersal. The 2040 General Plan does not include changes to existing Parks, Recreation, and Open Space land use designations, including along creeks and waterways in the General Plan area. Therefore, the 2040 General Plan would not facilitate permanent development within these wildlife movement corridors. Wildlife movement within areas of open space would not be affected by the 2040 General Plan because the 2040 General Plan facilitates development in the urbanized areas of the City. Development would not be facilitated in riparian areas along creeks or in the tidal marsh and wetlands habitat next to the San Francisco Bay. These predominantly open space areas would remain undeveloped.

The 2040 General Plan would focus on infill development along corridors and on parcels currently developed with structures and/or parking lots. Additionally, the 2040 General Plan contains Policy NRC-1.11, listed above, which requires development setbacks and open space easements along natural habitats and stream corridors. General Plan Goal NRC-2 and Implementation Program A, listed above, supports restoration of surface water resources including wetlands and streams, which would restore wildlife movement corridors provided by streams. Policy NRC-1.2 and NRC-1.7, also listed above, require the City to permanently dedicate areas of open space and apply improvements to this open space as a condition of new development approval. These policies would help to preserve important local wildlife corridors as new development is permitted throughout the General Plan area. Additionally, the following policies in the 2040 General Plan, would provide for a connected open space network, which could facilitate wildlife movement.

Policy NRC-1.1 Open Space Preservation and Maintenance. The City shall continue to preserve open space lands in the city, including scenic resources and environmentally-sensitive habitat areas, and maintain them as necessary to protect public health, safety, and welfare.

- **Policy NRC-1.3 Open Space Resource Acquisition**. The City shall explore possible resources for public acquisition of parcels with high habitat, visual, archaeological, or recreational values, including State and public trust funds, leases for private open space use, and additional bond measures.
- **Policy NRC-1.5 Collaboration for Open Space Acquisition**. The City shall work with non-profit organizations and other public agencies to acquire and maintain open space areas, perform creek restoration, and support other projects related to open space preservation.
- **Policy NRC-1.6 Open Space Funding.** The City shall work with local, regional, and State agencies, non-profit and community organizations, foundations, and grant sources to provide funding for open space land acquisition, maintenance, and programming.
- **Policy NRC-1.8 Open Space Access.** The City shall pursue public access to open space lands through the Tentative Map process to require dedications, easements, and other mechanisms in the Conditions of Approval for a project.
- **Policy NRC-1.9 Open Space Access Maintenance.** The City shall maintain and improve access to open space areas by clearly delineating areas that are appropriate for public use and access and differentiating them from those areas to be protected from human disturbance. In areas where public use is appropriate, the City shall provide access points and accessible design features (e.g., trails and related facilities).

Considering that the 2040 General Plan would not facilitate development in open space areas, including stream corridors, and that it contains policies to reduce impacts to stream corridors and protect wildlife movement corridors and open space, impacts would be less than significant.

SPECIFIC PLAN

The Specific Plan area is completely developed with existing buildings and paved areas. As such, the Specific Plan area generally does not offer suitable habitat for wildlife movement as it has been heavily altered throughout. Development facilitated by Specific Plan would be required to comply with existing City standards and processes, including the General Plan Policies listed above to protect and maintain open space areas that function as wildlife corridors and habitat linkages throughout the City and region. Considering that the Specific Plan would not facilitate development in open space areas, including riparian and stream corridors, and that development would be required to comply with General Plan policies to protect and enhance local movement corridors available in open space, there would be no impact.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Given that potential impacts to wildlife movement corridors would occur during construction either directly via fill or indirectly related to open space development, there would be no 2040 General Plan or Specific Plan operational impacts related to biological resources.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Local Biological Resources Policies or Ordinances Consistency

Significance Criterion e: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact BIO-4 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND/OR THE SPECIFIC PLAN WOULD BE REQUIRED TO CONFORM WITH APPLICABLE LOCAL POLICIES PROTECTING BIOLOGICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN

Development facilitated by the 2040 General Plan would occur on parcels that have mature street trees along their boundaries and sometimes have mature trees on the project site. Removal or alteration of these trees would be subject to the City's Tree Protection and Urban Forestry Program in MMC Chapter 8.60. This chapter adopts the City's Master Tree Plan prescribing regulations on the care, preservation, and proliferation of street trees within the city. Additionally, MMC Section 9.45.290 addresses the preservation of "protected trees" and prohibition of damage to these trees before, during and after grading per the recommendations of the project arborist. "Protected trees" under this section include any healthy tree with a trunk or multiple trunks with a circumference of 36 inches or greater measured 24 inches above mean existing grade.

Development facilitated by the 2040 General Plan would be required to comply with MMC Chapter 8.60 – Tree Protection and Urban Forestry Program and Section 9.45.290 for the preservation of "protected trees" during specific grading activities. The Tree Protection and Urban Forestry Program provides standards for the planting, pruning, removal, alteration, or any other work on a street tree as well as requirements for a tree removal permit and replacement plantings for any protected tree that would be removed during project construction. In addition to requiring tree removal permits, MMC Section 9.45.290 requires measures to protect existing trees during project construction during specific grading activities.

Additionally, the following goals and policies are included in the 2040 General Plan designed to protect trees and other vegetation in the General Plan area:

- **Policy LU-6.5** Street Trees. The City shall preserve existing street trees, replace dying or diseased trees, and plant new trees along El Camino Real consistent with the Downtown and El Camino Real Specific Plan, including the Streetscape Plan.
- Policy LU-9.4 Trees and Landscaping. The City shall protect the existing tree canopy and encourage tree planting including drought-tolerant landscaping and green infrastructure.

Implementation Program E. Street Tree and Landscape Master Plan. The City shall complete and adopt a Street Tree and Landscape Master Plan. The plan shall include an inventory of existing street trees, establish locations and a timeline for new tree plantings, and implement the Broadway and El Camino Real Streetscape Plan. The plan should include special plantings at gateways to the city. Themes throughout the plan shall include promoting the use of indigenous species and the concept of interconnected open space linked by dense street plantings along the sides of streets and in median strips.

Implementation Program F. Tree Preservation Ordinance. The City shall update the Tree Protection and Urban Forestry Program Ordinance to update the types and sizes of trees on private property to be protected, and to establish the standards to make decisions about tree removal permits, the procedures for tree removal or major trimming, and the requirements for replacement trees.

Goal RAC-3 Maintain, restore, and increase the existing trees and enhance the urban tree canopy into the future.

- **Policy RAC-3.1 Grow the Urban Forest.** The City shall update the City's Tree Inventory and Management Report and adopt an associated implementation plan to support opportunities to grow the urban forest by planting new trees, managing and caring for publicly-owned trees, and working to retain healthy trees.
- **Policy RAC-3.2 Reduce Urban Forest Loss**. The City shall support the identification and removal of aging or diseased trees near the end of their lifespan to prevent potential hazards and should support succession plantings to reduce net loss to the urban forest.
- **Policy RAC-3.3** New Funding Sources. The City shall explore new and innovative funding sources for tree planting and maintenance.
- **Policy RAC-3.4 Tree City USA Designation**. The City shall strive to maintain its status as a Tree City USA community by continuing to meet the program's requirements.
- **Policy RAC-3.5 City Tree Regulations.** The City shall update the Tree Protection and Urban Forestry Program Ordinance to include provisions for the protection of trees on private property.
- **Policy RAC-3.6** Street Trees. The City shall require new street trees as part of new development or other discretionary applications.

Implementation Program K. Tree Management Plan. The City shall prepare and maintain a Street Tree Management Plan that includes an inventory of existing trees on public property (data on age, location, species, and condition of the City's street trees), outlines a maintenance strategy, plans for the succession and growth of the urban canopy, and identifies funding strategies.

Implementation Program L. City's Tree Inventory and Management Report. The City shall update the Tree Inventory and Management Report.

Implementation Program N. Updated Tree Protection and Urban Forestry Ordinance. The City shall update the Tree Protection and Urban Forestry Ordinance to include provisions for the protection of trees on private property.

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Implementation of these goals, policies and implementation programs would require protection of street trees and the urban forest consistent with the MMC. Development facilitated by the 2040 General Plan would be required to comply with the MMC's requirements and 2040 General Plan goals, policies, and programs listed above. Therefore, the 2040 General Plan would be consistent with local biological resources policies and ordinances, and 2040 General Plan construction impacts would be less than significant.

SPECIFIC PLAN

The Specific Plan area is completely developed, and the only vegetation present are street trees lining city streets and El Camino Real, and landscaped ornamental plantings near buildings. Although there are no specific development projects associated with the Specific Plan, implementation of the plan would guide development in the Specific Plan area. Development facilitated by the Specific Plan could require some tree removal, which would be determined during the project's design and application process. However, development facilitated by the Specific Plan would be required to comply with MMC Chapter 8.60 standards for street tree preservation and Section 9.45.290 requiring applications for tree removal permits for "protected trees" and compliance with associated measures (e.g., tree replacement) where applicable. Compliance with these regulations, in addition to the proposed 2040 General Plan goals, policies, and programs listed above, would result in Specific Plan construction impacts related to local biological resources policies and ordinance consistency that are less than significant.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Given that potential impacts to trees would occur during construction, there would be no 2040 General Plan or Specific Plan operational impacts related to biological resources.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Habitat or Natural Community Conservation Plans Consistency

Significance Criterion f:	Would the project conflict with the provisions of an adopted Habitat
	Conservation Plan, Natural Community Conservation Plan, or other
	approved local, regional, or state habitat conservation plan?

Impact BIO-5 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND/OR SPECIFIC PLAN WOULD NOT CONFLICT WITH AN ADOPTED HCP, NCCP, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN. NO IMPACT WOULD OCCUR.

Construction and Operation

2040 GENERAL PLAN

There are no adopted HCPs or NCCPs within the City of Millbrae limits.³⁷ Therefore, there are no HCPs or NCCPs applicable to the 2040 General Plan. Therefore, development construction facilitated by the 2040 General Plan and operational implementation of General Plan policies would have no impacts related to conflicts with an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan.

SPECIFIC PLAN

There are no adopted HCPs or NCCPs within the Specific Plan area.³⁸ Therefore, there are no HCPs or NCCPs applicable to the Specific Plan. Therefore, development construction facilitated by the Specific Plan and operational implementation of Specific Plan policies would have no impacts related to conflicts with an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan.

Mitigation Measures

No mitigation is required.

Level of Significance

No impact

³⁸ Ibid.

³⁷ USFWS. 2022d. Environmental Conservation Online System: Habitat Conservation Plans. https://ecos.fws.gov/ecp/report/conservationplans-region-summary?region=8&type=HCP (accessed April 2022).

Significance Criterion g:	Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
Significance Criterion h:	Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?
Significance Criterion k:	Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?

Impact BIO-6 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND/OR SPECIFIC PLAN WOULD NOT RESULT CONVERT PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE (FARMLAND) TO NON-AGRICULTURAL USE NOR CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE OR A WILLIAMSON ACT CONTRACT. NO IMPACT WOULD OCCUR.

Construction and Operation

2040 GENERAL PLAN

The General Plan area is located entirely in the Urban and Built-Up Land area.³⁹ Development facilitated by the 2040 General Plan and implementation of General Plan policies would not modify Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The City of Millbrae does not have any land zoned for agricultural use.⁴⁰ Development facilitated by the 2040 General Plan would not be located on agricultural land. Therefore, the Plan would not conflict with agricultural zoning or Williamson Act contracts for preservation of agricultural use. No impact related to conversion of agricultural uses to non-agricultural uses would occur.

SPECIFIC PLAN

The Specific Plan area is located entirely in the Urban and Built-Up Land area.⁴¹ Development facilitated by the Specific Plan and implementation of Specific Plan policies would not modify Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Specific Plan area does not have any land zoned for agricultural use.⁴² Development facilitated by the Specific Plan would not be located on agricultural land. Therefore, the Plan would not conflict with agricultural zoning or Williamson Act contracts for preservation of agricultural use. No impact related to conversion of agricultural uses to non-agricultural uses would occur.

Mitigation Measures

No mitigation is required.

³⁹ DOC, op. cit.

⁴⁰ Millbrae, City of. 2009. City of Millbrae Official Zoning Map.

https://www.ci.millbrae.ca.us/home/showpublisheddocument/4871/635829382978030000 (accessed April 2022).

⁴¹ Ibid.

⁴² Ibid.

Level of Significance

No impact

Effects to Forest Land and Forest/Timberland Zoning Consistency

Significance Criterion i:	Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?
Significance Criterion j:	Would the project result in the loss of forest land or conversion of forest land to non-forest use?
Significance Criterion k:	Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?

Impact BIO-7 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND/OR SPECIFIC PLAN WOULD NOT RESULT IN THE CONVERSION OF LAND USED FOR AGRICULTURAL OR FORESTRY PURPOSES. NO IMPACT WOULD OCCUR.

Construction and Operation

2040 GENERAL PLAN

Development facilitated by the 2040 General Plan and implementation of General Plan policies would not result in the conversion of land used for agricultural or forestry purposes. The City of Millbrae does not provide forest and timber resources. As such, implementation of the Plan would not convert forest or timberland uses, and no impact related to conversion of forestry uses to non-forestry uses would occur.

SPECIFIC PLAN

Development facilitated by the Specific Plan and implementation of Specific Plan policies would not result in the conversion of land used for forestry purposes. The Specific Plan area does not provide forest and timber resources. As such, implementation of the Plan would not convert forest or timberland uses, and no impact would occur.

Mitigation Measures

No mitigation is required.

Level of Significance

No impact

3.3.5 Cumulative Impacts

The geographic scope of the cumulative biological, agriculture, and forestry resources analysis is the General Plan and Specific Plan areas and the immediate vicinities in adjacent cities and in unincorporated San Mateo County. The cumulative analysis considers the nearby past, present, and

reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Impact Analysis*) located in Millbrae, Burlingame, South San Francisco, and at the San Francisco International Airport in addition to the proposed plans.

Special-status Wildlife and Plant Species

Most of the cumulative plans and project would be located in a highly developed urban area that has limited potential to support special-status wildlife and plant species. There are waterways that provide habitat for riparian species of flora and fauna, the closest of which is San Andreas Lake. In addition, there are various open space areas throughout Millbrae and the surrounding area, including Junipero Serra Park to the north and Crystal Springs Regional Park that display grassland and shrubland/chaparral habitat. Riparian habitat and the open space grasslands within the plan areas are relatively small and generally isolated areas surrounded by urban development. Cumulative plans and projects listed in Table 3-1 consist predominantly of general plan buildouts including commercial and residential development, area plan buildout, and active transportation projects. Development and projects planned within the cumulative projects area would occur in similar, disturbed habitat common in urban areas. However, due to the presence of habitat for some special-status species in and near Millbrae, including the western pond turtle, California Ridgeway's rail, and marbled murrelet, these species also have the potential, albeit low, to occur within the cumulative projects area. Additionally, nesting birds protected by the MBTA, and specialstatus bat species have the potential to occur within the plan areas' surroundings. Standard preconstruction surveys and, if necessary, avoidance procedures would be required for cumulative projects with the potential to impact nesting birds and protected bat species. While there are isolated pockets of natural habitat that can support special-status wildlife and plant species, the urban and built-up nature of the general plan area and specific plan area as well as the other cumulative plan and projects area precludes the possible adverse cumulative impacts to biological resources related to special-status wildlife and plant species. Therefore, the cumulative impact related to special-status wildlife and plant species would be less than significant.

Sensitive Natural Communities

Millbrae contains several protected aquatic features and smaller riparian areas that would be considered wetlands and/or sensitive natural communities. These features are relatively small and often isolated from each other by large, urban developments. To address possible cumulative impacts to sensitive natural communities and wetlands, the 2040 General Plan includes several policies under proposed 2040 General Plan Goal NRC-2 to address these issues and to avoid impacts to water resources including creeks and rivers. Most planned developments in the cumulative projects area are designed to address future growth problems, prevent urban sprawl, and minimize developmental impacts to sensitive natural communities. This is accomplished by designing projects to occur in previously developed or highly disturbed areas that the characteristics of lack sensitive natural communities or riparian habitat. Cumulative plans and projects listed in Table 3-1 consist predominantly of general plan buildouts including commercial and residential development, area plan buildout, and active transportation projects. Development and projects planned within the cumulative projects area would occur in similar, disturbed habitat common in urban areas. Therefore, the cumulative impact related to sensitive natural communities and associated riparian habitat would be less than significant.

Wildlife Movement Corridors

Millbrae and its surrounding vicinity contain a variety of creeks and open space areas that act as potential movement corridors for fish and wildlife, such as in riparian areas along creeks or in the tidal marsh and wetlands habitat next to the San Francisco Bay. Any future cumulative development that occurs within the general plan and specific plan areas would have to take into account the potential impact to these corridors. Cumulative plans and projects listed in Table 3-1 consist of predominantly general plan buildouts including commercial and residential development, area plan buildout, and active transportation projects. Cumulative development would occur in similar, disturbed habitat common in urban areas. The areas surrounding the potential corridors within Millbrae and its surroundings in the Bay Area are highly developed, further impeding the movement of species out from these areas. Additionally, the current development plans would adhere to the 2040 General Plan's open space and creek setback requirements to reduce any potential cumulative impacts to fish and wildlife movement corridors to a less then significant level. Therefore, the cumulative impact related to wildlife movement corridors would be less than significant.

Protected Trees

Development may require the removal or encroachment on certain protected trees as listed by the City of Millbrae ordinances. Cumulative plans and projects listed in Table 3-1 consists of predominantly general plan buildouts including commercial and residential development, area plan buildout, and active transportation projects. Development and projects planned within the cumulative projects area would occur in similar, disturbed habitat common in urban areas. Future projects that occur in or near undeveloped areas may require an arborist report to determine the identity of trees planed for removal or encroachment. As such, the 2040 General Plan and Specific Plan, in conjunction with other cumulative plans and projects, would be required to adhere to applicable tree ordinances and regulations set by Cit of Millbrae and adjacent Cities of South San Francisco and Burlingame. Therefore, the cumulative impact related to protected trees would be less than significant.

Agriculture and Forestry Resources

Since there is no plans'-level impact related to agriculture and forestry resources, there would also be no cumulative impact related to agriculture and forestry resources.

Overall Level of Cumulative Significance

Less than significant

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3.4 Cultural and Tribal Cultural Resources

3.4.1 Introduction

This section addresses cultural and tribal resources in the General Plan area and Specific Plan area as well as the relevant regulatory framework. This section also analyzes the potential impacts to cultural resources and tribal cultural resources anticipated to result from development and growth under the 2040 General Plan and Specific Plan (proposed plans). Information in this section is based, in part, on a review of the results of a cultural resources records search conducted at the Northwest Information Center (NWIC) for the Millbrae Active Transportation Plan project, which overlaps a portion of the proposed plans area, additional archival and online research, a search of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC), and tribal consultation conducted by the City of Millbrae.

3.4.2 Environmental Setting

Cultural Resources Definitions

The term "cultural resources" under CEQA encompasses historic, archaeological, and tribal cultural resources as well as burial sites. Below is a brief summary of each definition:

- Historical Resources: Historical resources are resources listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources or identified in a historical resources survey, or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant. Historical resources may include eligible built environment resources of the precontact¹ or historic periods. For purposes of this section, historical resources are associated with the recent past. Specifically in California, historic resources are typically associated with the Spanish, Mexican, and American periods in the State's history and are generally less than 200 years of age.
- Archaeological Resources: Archaeology is the study of artifacts and material culture with the aim of understanding human activities and cultures in the past. Archaeological resources may be associated with prehistoric indigenous cultures as well as historic periods.
- **Tribal Cultural Resources:** Tribal cultural resources include sites, features, places, or objects that are of cultural value to one or more California Native American Tribes.
- **Burial Sites and Cemeteries:** Burial sites and cemeteries are formal or informal locations where human remains have been interred.

Overall Cultural Setting

Following is a brief overview of the indigenous history, ethnographic background, and post-contact history of the General Plan and Specific Plan area. This section is not intended to be a comprehensive review of the current resources available; rather, it serves as a general overview. Further details can be found in ethnographic studies, mission records, and major published sources.

¹ Precontact refers to the period prior to European settler contact with Native Americans, in this case specifically in California.

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Indigenous History

The City of Millbrae lies within the San Francisco Bay Area archaeological region.² Milliken et al. (2007) generally divided the prehistoric chronology of the Bay Area into five periods: The Early Holocene (8,000-3,500 Before Common Era [BCE]), Early Period (3,500-500 BCE), Lower Middle Period (500 BCE to CE 430 CE), the Upper Middle Period (430-1050 CE), and the Late Period (1050 CE-contact).

It is presumed that early Paleoindian groups lived in the area prior to 8,000 BCE; however, no evidence for that period has been discovered in the Bay Area to date.³ Sites dating to this period may be submerged or deeply buried as a result of rising sea levels and widespread sediment deposition that has occurred since the Terminal Pleistocene.⁴ For this reason, the Terminal Pleistocene Period (ca. 11,700-8,000 BCE) is not discussed here.

The earliest intensive study of archaeology of the San Francisco Bay Area began with N. C. Nelson of the University of California, Berkeley, between 1906 and 1908. He documented over 400 shell mounds throughout the area. Nelson was the first to identify the Bay Area as a discrete archaeological region.⁵

EARLY HOLOCENE (8000-3500 BCE)

Archaeological evidence from the early Holocene is limited as many sites dating to this period are likely buried under Holocene alluvial deposits.⁶ The available data suggest that the Early Holocene in the San Francisco Bay Area is characterized by a mobile forager pattern and the presence of millingslabs, handstones, and a variety of leaf-shaped projectile points. Two archaeological sites (CA-CCO-696 and CA-CCO-637) that date to this period have been identified in Contra Costa County at the Los Vaqueros Reservoir. The earliest date for the Early Holocene comes from the CA-CCO-696, approximately 7000 BCE.⁷

EARLY PERIOD (3500-600 BCE)

The Early Period saw increased sedentism with the introduction of new ground stone technologies (i.e., mortar and pestle), an increase in regional trade, and the first cut shell beads. The earliest evidence for the use of the mortar and pestle dates to 3800 BCE and comes from CA-CCO-637. By 1500 BCE, mortars and pestles had almost completely replaced millingslabs and handstones. The advent of the mortar and pestle indicates a greater reliance on processing nuts, especially acorns. Faunal evidence from various sites indicates a diverse faunal exploitation pattern based on mussel and other shellfish, marine mammals, terrestrial mammals, and birds.⁸

The earliest cut bead horizon is also associated with this period. Rectangular *Haliotis* spp. (abalone) and *Olivella spp*. (snail) beads have been identified at several Early Period sites, including CA-CCO-

² Michael J. Moratto, *California Archaeology*, (Salinas: Coyote Press, 1984).

³ Randall Milliken et al. *California Prehistory: Colonization, Culture, and Complexity,* "Punctuated Culture Change in the San Francisco Bay Area," (Lanham: Alta Mira Press, 2007).

⁴ Brian F. Byrd and L. Mark Raab, "Prehistory of Southern Bight: Models for a New Millennium," 2007.

⁵ Moratto, *California Archaeology*, 1984.

⁶ Sonia Ragir, *Contributions of the University of California Archeological Research Facility,* "The Early Horizon in Central California Prehistory, (Berkeley: University of California, Berkeley, 1972) and Moratto, *California Archaeology*, 1984.

⁷ Milliken et al. "Punctuated Culture Change in the San Francisco Bay Area," 2007.

⁸ Stella D'Oro, "Native California prehistory and climate in the San Francisco Bay Area," Master's Theses and Graduate Research, (San Jose State University, 2009).

637, CA-SCL-832 in Sunnyvale, and CA-ALA-307 in Berkeley.⁹ These early examples of cut beads were recovered from mortuary contexts.

LOWER MIDDLE PERIOD (500 BCE-CE 430)

The Lower Middle Period saw numerous changes from the previous period. The presence of chipped stone points and bone tools became typical. Rectangular shell beads, common during the Early Period, disappear completely and are replaced by split-beveled and saucer Olivella beads. In addition to the changes in beads, *Haliotis* spp. ornaments, bone tools and ornaments, and basketry awls also became typical, indicating the development of coiled basketry technology. Mortars and pestles continued to be the dominant grinding tool.¹⁰

Evidence for the Lower Middle Period in the Bay Area comes from sites such as the Emeryville shell mound (CA-ALA-309) and Ellis Landing (CA-CCO-295). CA-ALA-309 is one of the largest shell mounds in the Bay Area and contains multiple cultural sequences. The lower levels of the site, which date to the Middle Period, contain flexed burials with bone implements, chert bifaces, charmstones, and oyster shells.¹¹

UPPER MIDDLE PERIOD (430-1050 CE)

Around 430 CE, Olivella saucer bead trade networks that had been established during earlier periods collapsed and over half of known sites occupied during the Lower Middle Period were abandoned. Olivella saucer beads were replaced with Olivella saddle beads. New types of material culture appear within these sites, including elaborate, decorative blades, fishtail charmstones, new Haliotis ornament forms, and mica ornaments. Sea otter bones became more abundant, while salmon and other fish became less abundant, suggesting changes in faunal exploitation patterns from earlier periods.¹² Excavations at CA-ALA-309 indicate that a shift from mussels to oysters to clams may have occurred, and isotopic analysis confirms that San Francisco Bay individuals shifted from hunting higher-trophic-level foods in the Early Period to gathering foods like plants and shellfish in the Middle and Upper Periods.¹³ Subsistence analyses at various sites dating to this period indicate a diverse diet that included numerous species of fish, mammals, birds, shellfish, and plant resources that varied by location in the Bay Area.¹⁴

LATE PERIOD (CE 1050-CONTACT)

The Late Period saw an increase in social complexity, indicated by differences in burials and an increased level of sedentism relative to preceding periods, as evidenced by mortars weighing up to 90.7 kg.¹⁵ An increase in imported Napa Valley obsidian occurred during this time for the production of smaller points, preforms and simple flake tools. Small, finely worked projectile points of the Stockton Serrated series associated with bow and arrow technology appear around 1250 CE. Olivella shell beads disappeared and were replaced with *Olivella* lipped and spire -lopped beads in the south

⁹ Milliken et al. "Punctuated Culture Change in the San Francisco Bay Area," 2007.

¹⁰ Edward M. Luby and Mark F. Gruber, "The Dead Must be Fed: Symbolic Meanings of the Shellmounds of the San Francisco Bay Area," in *Cambridge Archeological Journal*, April 1999.

¹¹ Moratto, *California Archaeology*, 1984.

¹² Dwight D. Simons and Tim Carpenter, "Fish Remains From CA-MRN-44/H, Angel Island, Marin County, California," in *Proceedings of the Society for California Archaeology*, Vol. 21, 2009.

¹³ Edward Winslow Gifford, "Composition of California Shellmounds," in *American Archaeology and Ethnology*, "(Berkeley: University of California Press, 1916)

Gregory R. Burns et al. "Isotopic Evidence for Changing Residence Patterns Though the Middle to Late Holocene in Central California," (Chico: California State University, Chico, 2012).

¹⁴ Mark G. Hylkema, "Tidal Marsh, Oak Woodlands, and Cultural Florescence in the Southern San Francisco Bay Region," 2002.

¹⁵ Kari Lentz, "Flaked and Geound Stone Technology at CA-ALA-54: Mortar Bowls and Stockton Points," 2012.

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bay and clamshell disk beads in the north bay, where thicker and larger beads indicated higher affluence. The toggle harpoon, hopper mortar, and magnesite tube beads also appeared during this period.¹⁶ This period saw an increase in the intensity of resource exploitation that correlates with an increase in population.¹⁷ Many of the well-known sites of earlier periods, such as the Emeryville shell mound (CA-ALA-309) and the West Berkeley site (CA-ALA-307), were abandoned, as indicated by the lack of Late Period elements. Researchers have suggested that the abandonment of these sites may have resulted from fluctuating climates and drought that occurred throughout the Late Period.¹⁸

Ethnographic Background

The General Plan and Specific Plan areas lie within an area traditionally occupied by the Ohlone (or Costanoan) people. Ohlone territory extends along the California coast from the point where the San Joaquin and Sacramento Rivers merge into the San Francisco Bay to Point Sur. Their inland boundary was limited to the interior Coast Ranges.¹⁹ The Ohlone language belongs to the Penutian family, with several distinct dialects throughout the region.²⁰ It is divided into eight regional dialects: Karkin, Chochenyo, Ramaytush, Awaswas, Taymen, Mutsun, Rumsen, and Chalon.²¹

The pre-contact Ohlone were semi-sedentary, with a settlement system characterized by base camps and seasonal reserve camps composed of tule reed houses with thatched roofs made of matted grass.²² Just outside base camps, large sweat houses were built into the ground near stream banks used for spiritual ceremonies and possibly hygiene.²³ Villages were divided into small polities, each of which was governed by a chief responsible for settling disputes, acting as a war leader during times of conflict, and supervising economic and ceremonial activities.²⁴ Social organization appeared flexible to ethnographers and any sort of social hierarchy was not apparent to mission priests.²⁵

Archaeological investigations inform us about Ohlone mortuary rituals. Cemeteries were set away from villages and visited during the annual Mourning Anniversary Ceremonial human grave offerings might include Olivella beads, as well as tools like drills, mortars, pestles, hammerstones, bone awls, and utilized flakes.²⁶ Ohlone mythology included animal characterization and animism, which was the basis for several creation narratives. Ritually burying of animals, such as a wolf, squirrel, deer, mountain lion, gray fox, elk, badger, grizzly bear, blue goose, and bat ray, was

¹⁶ Peter Von Der Porten, Katherine Dixon, and Alex Degeorgey, "Seriation of Clam Shell Disk Beads in Central California," 2014.

¹⁷ Moratto, *California Archaeology*, 1984.

¹⁸ Kent G. Lightfoot and Edward M. Luby, "Late Halocene in the San Francisco Bay Area: Temporeal Trends in the Use and Abandonment of Shell Mounds in the East Bay," 2002.

¹⁹ A.L. Kroeber, *Handbook of the California Indians,* (New York: Dover Publications, Inc. 1925).

²⁰ A.L. Kroeber, Handbook of the California Indians, 1925.

²¹ Doug Jones, "Ritual and Religion in the Ohlone Cultural Area of Central California," Master's Theses and Graduate Research, (San Jose State University, 2015).

²² Grant William Schick, "The Ohlone and the Oak Woodlands: Cultural Adaptation in the Santa Clara Valley," *Research Manuscript Series*, No. 4, (Santa Clara University, 1994).

Russel K. Skowronek, "Shifting the Evidence: Perceptions of Life at the Ohlone (Costanoan) Missions of Alta California," *Ethnohistory*, 1998.

²³ Schick, "The Ohlone and the Oak Woodlands: Cultural Adaptation in the Santa Clara Valley," 1994.

²⁴ Russel K. Skowronek, "Shifting the Evidence: Perceptions of Life at the Ohlone (Costanoan) Missions of Alta California," *Ethnohistory*, 1998.

²⁵ Skowronek, "Shifting the Evidence: Perceptions of Life at the Ohlone (Costanoan) Missions of Alta California," *Ethnohistory*, 1998.

²⁶ Alan Leventhal et al., "Final Report on the Burial and Archaeological Data Recovery Program Conducted on a Portion of a Middle Period Ohlone Indian Cemetery, Katwas Ketneyma Wareeptak (The Four Matriarchs Site) CA-SCL-869," May 2009.

commonly practiced. Similar to human burials, ceremonial offerings were added to ritual animal graves like shell beads, ornaments, and exotic goods.²⁷

Ohlone subsistence strategies were based on hunting, gathering, and fishing.²⁸ Larger animals, like bears, might be avoided, but smaller game was hunted and snared on a regular basis.²⁹ Like the rest of California, the acorn was an important staple and was prepared by leaching acorn meal in openwork baskets and in holes dug into the sand.³⁰ The Ohlone also practiced controlled burning to facilitate plant growth.³¹ During specific seasons or in times of drought, the reserve camps would be utilized for gathering seasonal food and accessing food storage.³² Fishing would be done with nets and gorge hooks out of tule reed canoes.³³ Mussels were a particularly important food resource. Sea mammals such as sea lions and seals were hunted and beached whales were exploited.³⁴

Seven Franciscan missions were built within Ohlone territory in the late 1700s, and all members of the Ohlone group were eventually brought into the mission system.³⁵ After the establishment of the missions, Ohlone population dwindled from roughly 10,000 people in 1770 to 1,300 by 1814.³⁶ In 1973, the population of people with Ohlone descent was estimated at fewer than 300. The descendants of the Ohlone united in 1971 and have since arranged political and cultural organizations to revitalize aspects of their culture.³⁷

Post-Contact History

Post-contact history for the State of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican-American War, signals the beginning of the American Period when California became a territory of the United States.

SPANISH PERIOD (1769 – 1822)

Spanish explorers made sailing expeditions along the coast of California between the mid-1500s and mid-1700s. Juan Rodriguez Cabrillo in 1542 led the first European expedition to observe what was known by the Spanish as Alta (upper) California. For more than 200 years, Cabrillo and other Spanish, Portuguese, British, and Russian explorers sailed the Alta California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968; Rolle 2003). The

²⁷ Les W. Field and Alan Leventhal, "What Must it Have Been Like!' Critical Considerations of Precontact Ohlone Cosmology as Interpreted through Central California Ethnohistory," 2003.

²⁸ Russel K. Skowronek, "Shifting the Evidence: Perceptions of Life at the Ohlone (Costanoan) Missions of Alta California," *Ethnohistory*, 1998.

²⁹ Grant William Schick, "The Ohlone and the Oak Woodlands: Cultural Adaptation in the Santa Clara Valley," *Research Manuscript Series*, No. 4, (Santa Clara University, 1994).

³⁰ A.L. Kroeber, *Handbook of the California Indians,* (New York: Dover Publications, Inc. 1925).

³¹ Russel K. Skowronek, "Shifting the Evidence: Perceptions of Life at the Ohlone (Costanoan) Missions of Alta California," *Ethnohistory*, 1998.

³² Schick, "The Ohlone and the Oak Woodlands: Cultural Adaptation in the Santa Clara Valley," *Research Manuscript Series*, No. 4, 1994. ³³ Schick, "The Ohlone and the Oak Woodlands: Cultural Adaptation in the Santa Clara Valley," *Research Manuscript Series*, No. 4, 1994.

³⁴ A.L. Kroeber, *Handbook of the California Indians*, (New York: Dover Publications, Inc. 1925).

³⁵ Skowronek, "Shifting the Evidence: Perceptions of Life at the Ohlone (Costanoan) Missions of Alta California," *Ethnohistory*, 1998.

³⁶ Skowronek, "Shifting the Evidence: Perceptions of Life at the Ohlone (Costanoan) Missions of Alta California," *Ethnohistory*, 1998.

³⁷ Skowronek, "Shifting the Evidence: Perceptions of Life at the Ohlone (Costanoan) Missions of Alta California," *Ethnohistory*, 1998.

Spanish crown laid claim to Alta California based on the surveys conducted by Cabríllo and Vizcaíno.³⁸

By the 18th century, Spain developed a three-pronged approach to secure its hold on the territory and counter against other foreign explorers. The Spanish established military forts known as presidios, as well as missions and pueblos (towns) throughout Alta California. The 1769 overland expedition by Captain Gaspár de Portolá marks the beginning of California's Historic period, occurring just after the King of Spain installed the Franciscan Order to direct religious and colonization matters in assigned territories of the Americas. Portolá established the Presidio of San Diego as the first Spanish settlement in Alta California in 1769. Franciscan Father Junípero Serra also founded Mission San Diego de Alcalá that same year, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823.

Construction of missions and associated presidios was a major emphasis during the Spanish Period in California to integrate the Native American population into Christianity and communal enterprise. Incentives were also provided to bring settlers to pueblos or towns; just three pueblos were established during the Spanish Period, only two of which were successful and remain as California cities (San José and Los Angeles).

During this period, Spain also granted ranchos to prominent citizens and soldiers, though very few in comparison to the subsequent Mexican Period. To manage and expand their herds of cattle on these large ranchos, colonists enlisted the labor of the surrounding Native American population, often forcibly.³⁹ The missions governed the local Native Americans and sought to convert the population to Christianity. The influx of European settlers brought the local Native American population in contact with European diseases which they had no immunity against, resulting in a catastrophic reduction in native populations throughout the state.⁴⁰

MEXICAN PERIOD (1822 - 1848)

Several factors kept growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants.⁴¹

Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos. About 22 land grants (ranchos) were located in San Mateo County. Commonly, former soldiers and well-connected Mexican families were the recipients of these land grants, which now included the title to the land.⁴²

The Mexican Period ended in early January 1848, following several decisive battles against the United States. On January 10, leaders of the Pueblo of Los Angeles surrendered peacefully after Mexican General Jose Maria Flores withdrew his forces. Shortly thereafter, newly appointed

 ³⁸ Blake Gumprecht, *The Los Angeles River: Its Life, Death, and Possible Rebirth,* (Maryland: The Johns Hopkins University Press, 1999).
 ³⁹ Zephyrin Engelhardt, *San Fernando Rey, the Mission of the Valley.* (Chicago: Franciscan Herald Press, Chicago, 1927a.)
 Andres Resendez, *The Other Slavery: The Uncovered Story of Indian Enslavement in America,* (New York: Houghton Mifflin, 2016).

⁴⁰ William McCawley, *The First Angelinos: The Gabrielino Indians of Los Angeles, (Novato: Bellena Press Cooperative, 1996).*

⁴¹ Ramon Gutierrez et al., *Contested Eden: California Before the Goldrush*, (Berkeley: University of California Berkeley Press, 1998).

⁴² Burgess Shumway, *California Ranchos,* (San Bernadino: Borgo Press, 2006).

Mexican Military Commander of California Andrés Pico surrendered all of Alta California to US Army Lieutenant Colonel John C. Fremont in the Treaty of Cahuenga.

AMERICAN PERIOD (1848 – PRESENT)

The American Period officially began with the signing of the Treaty of Guadalupe Hidalgo in 1848, in which the United States agreed to pay Mexico \$15 million for conquered territory including the present-day states of California, Nevada, Utah, and parts of Colorado, Arizona, New Mexico, and Wyoming. Settlement of Southern California continued to increase during the early American Period. Ranchos were sold or otherwise acquired by Americans, with many subdivided into agricultural parcels or towns.

The discovery of gold in northern California in 1848 led to the California Gold Rush and California's population, particularly that of the bay area, grew exponentially. During this time, San Francisco became California's first true city, growing from a population of 812 to 25,000 in only a few years.⁴³ During the 1850s cattle boom, rancho vaqueros drove large herds from southern to northern California to feed that region's burgeoning mining and commercial boom.

By 1853, the population of California exceeded 300,000. Thousands of settlers and immigrants continued to pour into the state, particularly after the completion of the transcontinental railroad in 1869. By the 1880s, the railroads had established networks throughout northern California, resulting in fast and affordable shipment of goods, as well to transport new residents to the growing region.⁴⁴

History of the City of Millbrae

The Mexican Army took over the San Francisco Bay area in 1822. Jose Antonio Sanchez was stationed at the Presidio of San Francisco. He retired from the army in 1834 and was awarded a Rancho Grant from Mexican governor Jose Maria de Echeandia for agricultural purposes. Rancho Buri extended from Burlingame to South San Francisco and served as grazing land for Mission Dolores and Presidio of San Francisco. Sanchez built two adobes at the current intersection of El Camino Real and Millbrae Avenue, becoming an early hub of Millbrae. After his death, his 10 children inherited portions of the Rancho. Following the end of the Mexican-American War in 1848, Sanchez's son Jose de la Cruz Sanchez applied for a claim to the Rancho as required by the Land Act of 1851. He and his siblings earned the land patent in 1872. The portion of the Rancho now known as Millbrae was controlled by Jose De la Cruz Sanchez.⁴⁵ Jose De la Cruz Sanchez was forced to sell his holdings for property taxes, legal fees, and loans and the land was sold at sheriff auction to James Wilson. Wilson resold the land to gold rush entrepreneur Darius Ogden Mills in 1860, whom the city of Millbrae is named after from Mills and the Scottish word "brae," which means "rolling hills".⁴⁶ Mills with his partner A.F. Green established a dairy farm that became the primary economic driver of the area. Following the establishment of the dairy, several other supportive services and industries emerged to cater to the growing population, including small business establishments, a porcelain works, and housing developments. Mills died in 1910 and his estate house survived until it burned in 1954.47

⁴³ J.M. Guinn, "Gold! Gold! Gold! from San Francisquito! In *Los Angeles", Biography of a City*, edited by John Caughey and LaRee Caughey, (Berkeley: University of California Press, 1977).

⁴⁴ Glenn Dumke, "The Boom of the 1880s in Southern California," Southern California Quarterly, 76, 1994.

⁴⁵ Millbrae Chamber of Commerce, "History of Millbrae," https://millbrae.com/business-resources/, accessed April 2022.

⁴⁶ Millbrae Historical Society, "Millbrae: A Brief History," http://www.millbraehs.org/files/43529022.pdf, accessed April 2022.

⁴⁷ Millbrae Chamber of Commerce, "History of Millbrae," https://millbrae.com/business-resources/, accessed April 2022.

In 1926 the City of San Francisco decided to establish an airport east of Millbrae, naming it Mills Field and further spurring development in the area. Throughout the 1920s residential development expanded and the Millbrae Villa and Millbrae Highlands subdivisions were formed.⁴⁸ During this time, Millbrae was accessible locally by the interurban streetcar, which traveled from San Francisco to San Mateo. It was also accessible regionally from the Southern Pacific Railroad, which linked Millbrae to the surrounding region thanks, in part, to a right of way for a rail depot granted to the railroad by Mills.

After failing to obtain approval for incorporation in 1931, the Millbrae Civic Club was created to form a municipal government and in 1948, the City of Millbrae was incorporated as a General Law City, 92 two years after being found in 1856. At the time of founding, the chief industries of the city were agriculture, floriculture, dairy farming, and porcelain manufacturing.⁴⁹ Following suburban development after the end of World War II, Millbrae's residential development continued. By 1950 Millbrae's population had reached 8,972 residents and had more than doubled by 1960 to 15,873 residents. As of 2020, the population of Millbrae had reached 23,216 residents.⁵⁰

Existing Cultural Resources

Historical Resources

GENERAL PLAN AREA

A review of the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), and the California State Office of Historic Preservation Built Environment Directory (BERD), along with the City of Millbrae's Existing Conditions Report revealed that there are two designated historical resources in Millbrae: the Southern Pacific Depot and 1 Lewis Avenue, also known as the Alfred F. Green House.⁵¹ The Southern Pacific Depot is listed in the NRHP. The Alfred F. Green House was assigned California State Office of Historic Preservation status code or 2S2, meaning it was determined eligible for inclusion in the NRHP and is listed on the CRHR. Additionally, the site of the 1769 Portola Expedition Camp is listed as California Historical Landmark. Listed as California Historical Landmark #27, it was evaluated using criteria that have since been updated. The specific standards now in use were first applied in the designation of Landmark #770. Those California Historical Landmarks below #770 were not automatically listed in the CRHR and would require evaluation to determine whether they meet the definition of a historical resource pursuant to CEQA Guidelines Section 15064.6. The Millbrae Historical Society has identified eight (8) additional historical sites and 11 points of interest and marked the locations with informational plaques. These 19 sites and points do not meet the definition of a historical resource pursuant to CEQA Guidelines.

SPECIFIC PLAN AREA

A review of the NRHP, CRHR, and the California State Office of Historic Preservation Built Environment Directory (BERD), along with the City of Millbrae's Existing Conditions Report revealed that there are no designated historical resources in the Specific Plan area. Additionally, there are no historic districts within or adjacent to the Specific Plan area.

⁴⁸ Millbrae Historical Society, "Millbrae: A Brief History," http://www.millbraehs.org/files/43529022.pdf, accessed April 2022.

⁴⁹ Millbrae Chamber of Commerce, "History of Millbrae," https://millbrae.com/business-resources/, accessed April 2022.

⁵⁰ US Census Bureau (1950, 1960, 2020), retrieved from www.census.gov, accessed April 2022.

⁵¹ Millbrae, City of. 2016. "Natural Resources," Public Review Draft Existing Conditions Report

Archaeological Resources

GENERAL PLAN AREA AND SPECIFIC PLAN AREA

The City of Millbrae requested a review of the SLF and received a response from the NAHC on March 30, 2022, which indicated that the General Plan and Specific Plan areas are positive for Sacred Lands. Based on the NWIC records search conducted for the separate Citywide Millbrae ATP, it is known that archaeological resources (specifically, four prehistoric/Native American resources) have been identified within Millbrae. However, information on archaeological resources is confidential and will not be further discussed here.

Tribal Cultural Resources

GENERAL PLAN AREA

As part of its Tribal Cultural Resource identification process under AB 52 and SB 18, the City of Millbrae sent letters via certified mail to eight Native American tribal contacts identified by the Native American Heritage Commission (NAHC) as being traditionally and culturally affiliated with the 2040 General Plan Area. The tribal contacts included the following:

- Irene Zweirelein, Chairperson of the Amah Mutsun Band of Mission San Juan Bautista
- Tony Cerda, Chairperson of the Costanoan Rumsen Carmel Tribe
- Kanyon Sayers-Roods, MLD of the Indian Canyon Mutsun Band of Costanoan
- Ann Marie Sayers, Chairperson of the Indian Canyon Mutsun Band of Costanoan
- Monica Arellano, Vice Chairwoman of the Muwekma Ohlone Indian Tribe of the SF Bay Area
- Charlene Nijmeh, Chairperson of the Muwekma Ohlone Indian Tribe of the SF Bay Area
- Andrew Galvan, contact for the Ohlone Indian Tribe
- Kenneth Woodrow, Chairperson of the Wuksache Indian Tribe/Eshom Valley Band

Under AB 52, tribes have 30 days and under the provisions of SB 18, have 90 days to respond and request consultation. To date, the City has not received any responses for additional consultation under AB 52 or SB 18.

SPECIFIC PLAN AREA

The Specific Plan Area lies entirely within the General Plan Area. The AB 52/SB 18 letters discussed above covered both the General Plan and Specific Plan areas.

3.4.3 Regulatory Framework

Federal Regulations

National Historic Preservation Act

Properties which are listed in or have been formally determined eligible for listing in the NRHP are automatically listed in the CRHR. The following is therefore presented to provide applicable regulatory context. The NRHP was authorized by Section 101 of the National Historic Preservation Act and is the nation's official list of cultural resources worthy of preservation. The NRHP recognizes the quality of significance in American, state, and local history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects. Per 36 CFR

Part 60.4, a property is eligible for listing in the NRHP if it meets one or more of the following criteria:

- **Criterion A:** Are associated with events that have made a significant contribution to the broad patterns of our history
- **Criterion B:** Are associated with the lives of persons significant in our past
- **Criterion C:** Embody the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction
- **Criterion D:** Have yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, defined as follows:

Location:	The place where the historic property was constructed or the place where the historic event occurred
Design:	The combination of elements that create the form, plan, space, structure, and style of a property
Setting:	The physical environment of a historic property
Materials:	Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property
Workmanship:	The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory
Feeling:	A property's expression of the aesthetic or historic sense of a particular period of time
Association:	The direct link between an important historic event or person and a historic property

Certain properties are generally considered ineligible for listing in the NRHP, including cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions, relocated structures, or commemorative properties. Additionally, a property must be at least 50 years of age to be eligible for listing in the NRHP. The National Park Service states that 50 years is the general estimate of the time needed to develop the necessary historical perspective to evaluated significance (National Park Service 1997:41). Properties which are less than 50 years must be determined to have "exceptional importance" to be considered eligible for NRHP listing.

Archaeological Resources Protection Act

The ARPA amended the Antiquities Act of 1906 (16 USC 431–433) and set a broad policy that archaeological resources are important to the nation and should be protected, and required special permits before the excavation or removal of archaeological resources from public or Indian lands.

The purpose of the ARPA was to secure, for the present and future benefit of the American people, the protection of archaeological resources and sites that are on public lands and Indian lands, and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals having collections of archaeological resources and data that were obtained before October 31, 1979.

American Indian Religious Freedom Act

The American Indian Religious Freedom Act (AIRFA) established federal policy to protect and preserve the inherent rights of freedom for Native groups to believe, express, and exercise their traditional religions. These rights include but are not limited to access to sites, use and possession of sacred objects, and freedom to worship through ceremonial and traditional rites.

Native American Graves Protection and Repatriation Act

The NAGPRA of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains and associated funerary objects and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any federally funded institution housing Native American remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American tribe claiming affiliation.

State Regulations

California Register of Historical Resources

The CRHR was established in 1992 and codified by PRC §§5024.1 and 4852. The CRHR is an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (Public Resources Code, 5024.1(a)). The criteria for eligibility for the CRHR are consistent with the NRHP criteria but have been modified for state use in order to include a range of historical resources that better reflect the history of California (Public Resources Code, 5024.1(b)). Unlike the NRHP however, the CRHR does not have a defined age threshold for eligibility; rather, a resource may be eligible for the CRHR if it can be demonstrated sufficient time has passed to understand its historical or architectural significance (California Office of Historic Preservation 2006). Further, resources may still be eligible for listing in the CRHR even if they do not retain sufficient integrity for NRHP eligibility (California Office of Historic Preservation 2006). Generally, the California Office of Historic Preservation 2006).

Properties are eligible for listing in the CRHR if they meet one of more of the following criteria:

- **Criterion 1:** Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
- **Criterion 2:** Is associated with the lives of persons important to our past

- **Criterion 3:** Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
- **Criterion 4:** Has yielded, or may be likely to yield, information important in prehistory or history

California Environmental Quality Act

CEQA GUIDELINES SECTION 15064.5(A) - CEQA DEFINITION OF HISTORICAL RESOURCES

California Public Resources Code (PRC) Section 21804.1 requires lead agencies determine if a project could have a significant impact on historical or unique archaeological resources. As defined in PRC Section 21084.1, a historical resource is a resource listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR); a resource included in a local register of historical resources or identified in a historical resources survey pursuant to PRC Section 5024.1(g); or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant. PRC Section 21084.1 also states resources meeting the above criteria are presumed to be historically or culturally significant unless the preponderance of evidence demonstrates otherwise. Resources listed in the National Register of Historic Places (NRHP) are automatically listed in the CRHR and are, therefore, historical resources under CEQA. Historical resources may include eligible built environment resources and archaeological resources of the precontact or historic periods.

CEQA GUIDELINES SECTION 15064.5(B) - SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE

According to CEQA, an impact that results in a substantial adverse change in the significance of a historical resource is considered a significant impact on the environment. A substantial adverse change could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired (CEQA Guidelines §15064.5 [b][1]). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR or a local register (CEQA Guidelines §15064.5[b][2][A]).

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC §21083.2[a], [b]).

CEQA GUIDELINES SECTION 15064.5(C) - EFFECTS ON ARCHAEOLOGICAL RESOURCES

CEQA Guidelines Section 15064.5(c) provides further guidance on the consideration of archaeological resources. If an archaeological resource does not qualify as a historical resource, it may meet the definition of a "unique archaeological resource" as identified in PRC Section 21083.2. PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: 1) it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; 2) has a special and particular quality such as being the oldest of its type or the best available example of its type; or 3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological resource does not qualify as a historical or unique archaeological resource, the impacts of a project on those resources will be less than significant and need not be considered further (CEQA Guidelines Section 15064.5[c][4]). CEQA Guidelines Section 15064.5 also provides guidance for addressing the potential presence of human remains, including those discovered during the implementation of a project.

CEQA GUIDELINES SECTION 15064.5(D) - EFFECTS ON HUMAN REMAINS

Native American human remains and associated burial items may be significant to descendant communities and/or may be scientifically important for their informational value. They may be significant to descendant communities for patrimonial, cultural, lineage, and religious reasons. Human remains may also be important to the scientific community, such as prehistorians, epidemiologists, and physical anthropologists. The specific stake of some descendant groups in ancestral burials is a matter of law for some groups, such as Native Americans (CEQA Guidelines § 15064.5(d); PRC § 5097.98). CEQA and other State regulations regarding Native American human remains provide the following procedural requirements to assist in avoiding potential adverse effects on human remains within the contexts of their value to both descendant communities and the scientific community:

- When an initial study identifies the existence or probable likelihood that a project would affect Native American human remains, the lead agency is to contact and work with the appropriate Native American representatives identified through the NAHC to develop an agreement for the treatment and disposal of the human remains and any associated burial items (CEQA Guidelines § 15064.5(d); PRC § 5097.98).
- If human remains are accidentally discovered, the county coroner must be contacted. If the county coroner determines that the human remains are Native American, the coroner must contact the NAHC within 24 hours. The NAHC must identify the most likely descendant (MLD) to provide for the opportunity to make recommendations for the treatment and disposal of the human remains and associated burial items.
- If the MLD fails to make recommendations within 24 hours of notification or the project applicant rejects the recommendations of the MLD, the Native American human remains and associated burial items must be reburied in a location not subject to future disturbance within the project site (PRC § 5097.98).
- If potentially affected human remains or a burial site may have scientific significance, whether or not it has significance to Native Americans or other descendent communities, then under CEQA, the appropriate mitigation may require the recovery of the scientific information of the remains/burial through identification, evaluation, data recovery, analysis, and interpretation (CEQA Guidelines § 15064.5(c)(2)).

CEQA GUIDELINES SECTION 15126.4 - CULTURAL RESOURCES MITIGATION

Section 15126.4 of the CEQA Guidelines stipulates an EIR shall describe feasible measures to minimize significant adverse impacts. In addition to being fully enforceable, mitigation measures must be completed within a defined time period and be roughly proportional to the impacts of the project. Generally, a project which is found to comply with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (the Standards) is considered to be mitigated below a level of significance (CEQA Guidelines Section 15126.4(b)(1)). For historical resources of an archaeological nature, lead agencies should also seek to avoid damaging effects where feasible. Preservation in

place is the preferred manner to mitigate impacts to archaeological sites; however, data recovery through excavation may be the only option in certain instances (CEQA Guidelines Section 15126.4(b)(3)).

California Health and Safety Code §7050.5 - Human Remains

Section 7050.5 of the California Health and Safety Code states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined if the remains are subject to the coroner's authority. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification.

California Public Resources Code §5097.91 – Sacred Lands Inventory

Section 5097.91 of the Public Resources Code established duties include the inventory of places of religious or social significance to Native Americans and the identification of known graves and cemeteries of Native Americans on private lands. This inventory is referred to as the NAHC Sacred Lands File. Under Section 5097.9 of the Public Resources Code, a State policy of noninterference with the free expression or exercise of Native American religion was articulated along with a prohibition of severe or irreparable damage to Native American sanctified cemeteries, places of worship, religious or ceremonial sites or sacred shrines located on public property. Section 5097.98 of the Public Resources Code specifies a protocol to be followed when the NAHC receives notification of a discovery of Native American human remains from a county coroner. Section 5097.5 defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands.

California Senate Bill 18 – Tribal Consultation

California Government Code Section 65352.3 (adopted pursuant to the requirements of Senate Bill [SB] 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005); "The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places." SB 18 refers to PRC Section 5097.9 and 5097.995 to define cultural places as:

Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9) and Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historical Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.995).

California Assembly Bill 52 – Effects on Tribal Cultural Resources

Assembly Bill (AB) 52 expanded CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect

on the environment" (PRC Section 21084.2). AB 52 further states when feasible, the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe," and meets either of the following criteria:

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k).
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

In recognition of California Native American tribal sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments and with respect to the interests and roles of project proponents, it is the intent AB 52 to accomplish all of the following:

- 1. Recognize that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities.
- 2. Establish a new category of resources in CEQA called "tribal cultural resources" that considers the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation.
- 3. Establish examples of mitigation measures for tribal cultural resources that uphold the existing mitigation preference for historical and archaeological resources of preservation in place, if feasible.
- 4. Recognize that California Native American tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated (because CEQA calls for a sufficient degree of analysis, tribal knowledge about the land and tribal cultural resources at issue should be included in environmental assessments for projects that may have a significant impact on those resources).
- 5. In recognition of their governmental status, establish a meaningful consultation process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning tribal cultural resources, early in the CEQA environmental review process, so that tribal cultural resources can be identified, and culturally appropriate mitigation and mitigation monitoring programs can be considered by the decision-making body of the lead agency.
- 6. Recognize the unique history of California Native American tribes and uphold existing rights of all California Native American tribes to participate in, and contribute their knowledge to, the environmental review process pursuant to CEQA.
- 7. Ensure that local and tribal governments, public agencies, and project proponents have information available, early in CEQA environmental review process, for purposes of identifying and addressing potential adverse impacts to tribal cultural resources and to reduce the potential for delay and conflicts in the environmental review process.

- 8. Enable California Native American tribes to manage and accept conveyances of, and act as caretakers of, tribal cultural resources.
- 9. Establish that a substantial adverse change to a tribal cultural resource has a significant effect on the environment.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed in the jurisdiction of the lead agency.

Local Regulations

The City of Millbrae does not have an existing regulatory process or local regulations pertaining to plans or projects that may impact cultural resources or tribal cultural resources.

3.4.4 Impacts and Mitigation Measures

Significance Criteria

The City of Millbrae utilizes the following 2022 CEQA Guidelines Appendix G significance criteria questions related to Cultural Resources and Tribal Cultural Resources.

Would the 2040 General Plan or Specific Plan:

- a) Cause a substantial adverse change in the significance of a historic resource pursuant to §15064.5?
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
- c) Disturb any human remains, including those interred outside of formal cemeteries?
- d) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? or
 - 2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Approach to Analysis

This evaluation focuses on whether implementation of the proposed plans would impact historical, archaeological, or tribal cultural resources.

Both direct and indirect effects of the proposed plans implementation were considered for this analysis below. Direct impacts are typically associated with construction and/or ground-disturbing activities, and have the potential to immediately alter, diminish, or destroy all or part of the character and quality of a cultural resource or tribal cultural resource. Indirect impacts are typically associated with post-project implementation conditions that have the potential to alter or diminish the setting of a cultural resource or tribal cultural resource by introducing visual intrusions on existing sites that are considered undesirable.

Historic Resources

The significance of a historical resources would be "materially impaired" if the proposed plans could result in the following effects at or adjacent to a known historical site within the plan areas:

- (A) Demolish or materially alter in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; or
- (B) Demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources... or its identification in a historical resources survey... unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- (C) Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA. (CEQA Guidelines Section 15064.5[b][2])

Archeological Resources and Human Remains

The analysis of the impacts to cultural resources is based, in part, on the results of a cultural resources records search previously conducted at the Northwest Information Center (NWIC) for the Millbrae Active Transportation Plan project, which overlaps a small portion of the proposed General Plan area and Specific Plan area, extensive archival and online research, and a search of the SLF that was conducted by the NAHC.

Tribal Cultural Resources

In accordance with AB 52 and SB18, the City of Millbrae sent letters via certified mail to eight Native American tribal contacts identified by the Native American Heritage Commission (NAHC) as being traditionally and culturally affiliated with the 2040 General Plan Area.

EIR Scoping Comments Consideration

This section also addresses a written comment from NAHC received in response to the EIR NOP regarding the proposed plans being subject to the requirements and provisions under SB 18 and AB 52 for tribal cultural resources. Consistency of the proposed plans with SB 18 and AB 52 is verified under Impact CR-4.

Specific Threshold of Significance

For purposes of this analysis, the following thresholds are used to evaluate the significance of cultural resources and tribal cultural resources impacts resulting from implementation of the proposed plans.

- Impair a historic resource's eligibility ability to convey its significance (i.e., affect a resources' inclusion in the NRHP or CRHR) or not adhere to the Secretary of Interior's Standards for Rehabilitation.
- Physically damage or destroy archaeological data or human remains.
- Physically damage, destroy, or otherwise adversely impact a site, feature, place, or cultural landscape with cultural value to a California Native American tribe and that is a resource determined by the City of Millbrae, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

Impact Evaluation

Effects to Historical Resources

Significance Criterion a: Would the proposed plans cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Impact CR-1 THE 2040 GENERAL PLAN AND SPECIFIC PLAN HAVE THE POTENTIAL TO RESULT IN SIGNIFICANT IMPACTS IF DEVELOPMENT CARRIED OUT UNDER THE PLANS WOULD CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A HISTORICAL RESOURCE. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE EVEN WITH MITIGATION.

Construction

2040 GENERAL PLAN

There is one known historical resource that is listed in NRHP and CRHR and one resource determined eligible for the NRHP, listed in the CRHR. In addition to these known historical resources, there may be other yet unidentified resources which are eligible for inclusion in the NRHP or CRHR. The General Plan would guide the general distribution, location, and extent of the various land uses in Millbrae.

Effects on cultural resources are only knowable once a specific project has been proposed, because the effects are highly dependent on both the individual project site conditions, project activities that may alter the character of a built environment resource, and/or the characteristics of the proposed ground-disturbing activity. Demolition or other structural alteration associated with development facilitated by the 2040 General Plan has the potential to impair historic built-environment resources. Consequently, damage to or destruction of cultural resources could occur as a result of development under the proposed 2040 General Plan. In order to ensure that development within Millbrae does not have a detrimental effect on cultural resources, each project would need to be assessed as it is proposed.

Although there are no specific development projects associated with the 2040 General Plan, implementation of the plan would guide development in Millbrae through the year 2040. New residential, commercial, and industrial uses would be implemented by new development and the conversion of existing properties to new uses. Changes to the transportation network would include the redesign of streets and streetscapes, while public spaces would be enhanced through the development of trails and park facilities. Potential future development occurring under the 2040 General Plan may include site preparation, demolition and construction activities. As noted in the

2040 General Plan, there is very little vacant land remaining in Millbrae, limiting new housing development opportunities and most new housing will have to be developed on existing underutilized land and through the reuse of existing buildings. The 2040 General Plan's Priority Development Area (PDA), which includes the Station Area, Downtown, and the El Camino Real corridor would allow for higher density and intensity development, as outlined in Policy LU-1.1. Similarly, Policy LU-1.2 would encourage higher-intensity development around the Millbrae Station and along the El Camino corridor to maximize transit use. In addition, such densification could occur over an 18-year planning period through 2040, during which additional structures would age into the category of potential historical resource. As such, these activities could have the potential to result in the physical demolition, destruction, relocation, or alteration of potential historical resources.

Goal RAC-2 and its associated policies and implementation program in the Recreation, Arts, and Culture Element of the Plan, listed below, would reduce potential impacts to a historical resource.

Goal RAC-2	Identify and preserve historic districts and structures to help define Millbrae's
	identity and character, enhance the built environment, and contribute to
	economic development.

- **Policy RAC-2.1 Historic Resource Inventory.** The City shall prepare and maintain an inventory of sites and structures of historical significance and evaluate the establishment of Historic Resource Districts.
- **Policy RAC-2.2** New Development near Historic Structures. The City shall encourage new development to complement the character of nearby historic structures.
- **Policy RAC-2.3** Historical and Archaeological Resource Preservation. The City shall strive to prevent destruction of significant historical and archaeological resources through review as part of the CEQA process.
- **Policy RAC-2.5** Adaptive Reuse. The City shall maintain flexible land use standards to allow adaptive reuse of historic buildings to preserve their original design and character, consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.
- Policy RAC-2.6 Historic Resource Protection. The City shall apply the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings where required to adequately protect and preserve historic resources.

The goals, policies, and implementation programs listed above would reduce the potential for historical resources to be adversely impacted from the development facilitated by the 2040 General Plan, but there would still be potential for development to impact historical resources. However, implementation of Mitigation Measure CR-1 would reduce impacts to historical resources by identifying and evaluating significant historical resources and managing relocation, rehabilitation, or alteration in compliance with the Standards as applicable. Nonetheless, even with implementation of Mitigation Measure CR-1, existing and eligible historical resources could still be materially impaired by future development that would be carried out under the 2040 General Plan. While Historic American Building Survey (HABS) documentation would reduce impacts to the greatest extent feasible in cases where compliance with the Standards or avoidance is not possible, legal precedent has established that such a measure cannot mitigate impacts to a level of less than significant, because the loss of historical fabric cannot be readily compensated for by

commemorative mitigation.⁵² Therefore, construction-related 2040 General Plan impacts related to historical resources would be significant and unavoidable with mitigation.

SPECIFIC PLAN

There are no known historical resources that are listed in the NRHP or CRHR within the Specific Plan area. However, there may be other yet unidentified resources which are eligible for inclusion in the NRHP or CRHR within the Specific Plan area.

Although there are no specific development projects associated with the Specific Plan, implementation of the plan would guide development in the Downtown and El Camino Specific Plan area. New residential and commercial uses would be implemented via new development, especially in the areas identified as opportunity sites in the Specific Plan area, where existing land use would change from General Commercial to allow for residential uses in Downtown Mixed Use (DMU), Neighborhood Commercial Mixed Use (NCMU), Corridor Mixed Use (CMU), and Residential Focused Mixed Use (RFMU). As such, development facilitated by the Specific Plan may include site preparation, demolition, and construction activities. Furthermore Section 15064.5(b) of the CEQA Guidelines recognizes that changes to a property's immediate surrounding, which may include new construction on parcel adjacent to a historical resource, could result in material impairment and a significant impact to a historical resource.

Specific Plan Standard DSG-1 and one of its implementation policies of the Development Standards and Guidelines, listed below, would reduce impacts to a historical resource.

Standard DSG-1 Development Intensity, Density and Height. Development Intensity and building height are defining features in establishing overall character, aesthetics, and experience of a place. The Downtown and El Camino Real Specific Plan uses both Floor to Area Ratio (FAR), residential densities and building height to regulate the building envelope.

> **Guideline Building Height.** Maximum allowable building heights work together with development intensity standards to regulate the urban form. The majority of existing buildings in the Plan Area are quite low. The Specific Plan Vision, and the proposed land uses are expected to result in a significantly high projected growth and economic development. Additionally, the Plan Area offers many opportunity sites to fulfill RHNA (Regional Housing Needs Allocation) goals. Increasing allowable building heights in the Plan Area will create optimal conditions for accommodating projected growth.

Key factors that inform density and height limits established for the Plan Area include:

Proximity to historic buildings

The Specific Plan standard and implementation program listed above would reduce the potential for historical resources to be adversely impacted from the development facilitated by the Specific Plan, but there would still be potential for development to impact historical resources. However, implementation of Mitigation Measure CR-1 would reduce impacts to historical resources by identifying and evaluating significant historical resources and managing relocation, rehabilitation, or alteration in compliance with the Standards as applicable. Nonetheless, even with implementation of Mitigation Measure CR-1, existing and eligible historical resources could still be materially

⁵² League for Protection of Oakland's etc. Historic Resources v. City of Oakland (1997) 52 Cal.App.4th 896.

impaired by future development that would be carried out under the Specific Plan. While HABS documentation would reduce impacts to the greatest extent feasible in cases where compliance with the Standards or avoidance is not possible, legal precedent has established that such a measure cannot mitigate impacts to a level of less than significant, because the loss of historical fabric cannot be readily compensated for by commemorative mitigation.⁵³ Therefore, construction-related Specific Plan impacts related to historical resources would be significant and unavoidable with mitigation.

Operation

Given that impacts to historical resources occur during construction, there would be no 2040 General Plan or Specific Plan operational impact related to historical resources.

Mitigation Measures

MITIGATION MEASURE CR-1: PREPARE HISTORICAL RESOURCES EVALUATION FOR PROJECTS INVOLVING BUILDINGS 45 YEARS OR OLDER AND IMPLEMENT MITIGATION PRIOR TO AND DURING CONSTRUCTION

A historical resources evaluation shall be prepared prior to approval of a project subject to discretionary review carried out under the 2040 General Plan and/or Specific Plan involving the demolition or substantial improvement, as defined in Section 8.50.020 of the Millbrae Municipal Code, and as deemed necessary by the Community Development Director of a building, structure, object, or other built environment feature that is 45 years of age or older. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify potential historical resources within the proposed development site. All properties 45 years of age or older shall be evaluated within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. All evaluated properties shall be documented on Department of Parks and Recreation Series 523 Forms. The report will be submitted to the City for review and concurrence. If the property is already listed in the NRHP or CRHR, the historical resources evaluation described above shall not be required.

If historical resources are identified within the development site of a proposed development, efforts shall be made to the extent feasible to ensure that impacts are mitigated. Application of mitigation shall generally be overseen by a qualified architectural historian or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g., preservation in place). In conjunction with a development application that may affect the historical resource, the historical resources evaluation report shall also identify and specify the treatment of character-defining features and construction activities.

Efforts shall be made to the greatest extent feasible to ensure that the relocation, rehabilitation, or alteration of the resource is consistent with the Secretary of the Interior's Standards for the Treatments of Historic Properties (Standards). In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (CEQA Guidelines § 15126.4(b)(1)). Application of the Standards shall be overseen by a qualified architectural historian or historic architect meeting the PQS. In conjunction with any development application that may affect the historical resource, a

⁵³ League for Protection of Oakland's etc. Historic Resources v. City of Oakland (1997) 52 Cal.App.4th 896.

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

report identifying and specifying the treatment of character-defining features and construction activities shall be provided to the City for review and concurrence. As applicable, the report shall demonstrate how the project complies with the Standards and be submitted to the City for review and approval prior to the issuance of permits.

If significant historical resources are identified on a development site and compliance with the Standards and or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. Mitigation measures may include documentation of the historical resource in the form of a Historic American Building Survey (HABS) report, or equivalent. The report shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the PQS and submitted to the City prior to issuance of any permits for demolition or alteration of the historical resource.

Level of Significance

Significant and unavoidable with mitigation

Effects to Archaeological Resources

Significance Criterion b: Would the proposed plans cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact CR-2 THE 2040 GENERAL PLAN AND SPECIFIC PLAN HAVE THE POTENTIAL TO RESULT IN SIGNIFICANT IMPACTS IF DEVELOPMENT CARRIED OUT UNDER THE PLANS WOULD CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE, INCLUDING THOSE THAT QUALIFY AS HISTORICAL RESOURCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Construction

2040 GENERAL PLAN

It is presumed that archaeological resources that are eligible for inclusion in the NRHP or CRHR exist throughout Millbrae. Effects on archaeological resources are only known once a specific development has been proposed because the effects are highly dependent on both the individual development site conditions and the characteristics of the proposed ground-disturbing activity. Ground-disturbing activities associated with development facilitated by the 2040 General Plan, particularly in areas that have not been studied through a cultural resources investigation, or when excavation depths exceed those previously attained, have the potential to damage or destroy previously-unknown historic or prehistoric archaeological resources are especially likely in instances where ground disturbance will occur in native soils, in historic-age fill of unknown origin, and in areas that were developed prior to the implementation of a City-wide sewer system and trash collection service. Consequently, damage to or destruction of cultural resources could occur as a result of development under the proposed 2040 General Plan. In order to ensure that development within Millbrae does not have a detrimental effect on archaeological resources, each project would need to be assessed once project location and design concept is available.

Although there are no specific development projects associated with the 2040 General Plan, implementation of the plan would guide development in Millbrae through the year 2040. New residential, commercial, and industrial uses would be implemented by new development and the conversion of existing properties to new uses. Potential future development occurring under the 2040 General Plan may include site preparation, demolition and construction activities.

The Recreation, Arts, and Culture (RAC) Element of the 2040 General Plan includes several goals, policies, and implementation programs that address archaeological resources.

Goal RAC-2 and its associated policies and implementation programs, listed below, would reduce potential impacts to archaeological resources, whether prehistoric or historic in nature.

- Goal RAC-2 Identify and preserve historic districts and structures to help define Millbrae's identity and character, enhance the built environment, and contribute to economic development.
 - **Policy RAC-2.1 Historic Resource Inventory**. The City shall prepare and maintain an inventory of sites and structures of historical significance and evaluate the establishment of Historic Resource Districts.
 - **Policy RAC-2.3 Historical and Archaeological Resource Preservation**. The City shall strive to provision of incentives (such as the State Historical Building Code) for the preservation, restoration, and adaptive reuse of qualifying historic structures that are threatened with demolition or degradation.
 - **Policy RAC-2.6 Historic Resource Protection**. The City shall apply the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings where required to adequately protect and preserve historic resources.

Goal RAC-4 and several of its associated policies and implementation programs, listed below, would reduce potential impacts to archaeological resources.

- Goal RAC-4 Identify and preserve sites and structures of cultural significance to strengthen City identity, encourage appreciation for history and culture, and contribute to economic vitality.
 - **Policy RAC-4.1** Native American Cultural Resource Protection. The City shall require the preservation and protection of Native American cultural resources, sacred sites, places, features, and objects, including historic or prehistoric ruins, burial grounds, cemeteries, and ceremonial sites, and shall ensure appropriate treatment of Native American and other human remains discovered during a project.
 - **Policy RAC-4.3 Cultural Sites Inventory.** The City shall comply with State requirements to identify and maintain an inventory of sites and structures of cultural and architectural significance.

Implementation Programs associated with the Recreation, Arts, and Culture (RAC) Element that are relevant to archaeological resources include the following:

Implementation Program I: Historical Property Inventory. The City shall prepare an inventory of sites and structures of historical and archaeological significance consistent with the criteria outlined by the California Register of Historical Resources.

Implementation Program J: Protection of Historic Resources. The City shall review and amend, as necessary, City regulatory procedures and codes to ensure adequate recognition and protection of historic resources, including but not limited to objective standards for historic structures and adjacent development.

The goals, policies, and implementation programs listed above would help reduce the potential for archaeological resources to be adversely impacted by the ground-disturbing activities associated with the development facilitated by the 2040 General Plan. However, there would still be potential for development to impact archaeological resources and those impacts would be potentially significant. However, implementation of Mitigation Measures CR-2 and CR-3 (evaluate and protect significant archaeological resources if encountered during construction associated with development under the 2040 General Plan), would reduce 2040 General Plan construction impacts related to archeological resources to less than significant with mitigation.

SPECIFIC PLAN

Although there are no specific development projects associated with the Specific Plan, implementation of the plan would guide development in the Downtown and El Camino Specific Plan area. New residential and commercial uses would be implemented by new development, especially in the areas identified as opportunity sites in the Specific Plan, where existing land use would change from General Commercial to allow for residential uses in Downtown Mixed Use (DMU), Neighborhood Commercial Mixed Use (NCMU), Corridor Mixed Use (CMU), and Residential Focused Mixed Use (RFMU). Development facilitated by the Specific Plan may include site preparation, demolition, and construction activities.

Effects on archaeological resources are only known once a specific development has been proposed because the effects are highly dependent on both the individual development site conditions and the characteristics of the proposed ground-disturbing activity. Ground-disturbing activities associated with development facilitated by the Specific Plan, particularly in areas that have not been studied through a cultural resources investigation, or when excavation depths exceed those previously attained, have the potential to damage or destroy previously-unknown historic or prehistoric archaeological resources that may be present on or below the ground surface. Impacts to archaeological resources are especially likely in instances where ground disturbance will occur in native soils, in historic-age fill of unknown origin, and in areas that were developed prior to the implementation of a City-wide sewer system and trash collection service. Consequently, damage to or destruction of cultural resources could occur as a result of development under the proposed Specific Plan. In order to ensure that development within Millbrae does not have a detrimental effect on archaeological resources, each project would need to be assessed as it is proposed.

Projects associated with the Specific Plan would be required to adhere to the goals and policies listed in the 2040 General Plan. While the goal and policies listed in the 2040 General Plan address the protection and preservation of tribal cultural resources, there would still be a potential for development facilitated by the Specific Plan to impact archaeological resources. However, implementation of Mitigation Measures CR-2 and CR-3 (evaluate and protect significant archaeological resources if encountered during construction associated with development under the Specific Plan), would reduce Specific Plan construction impacts related to archeological resources to less than significant with mitigation.

Operation

Given that potential impacts to archaeological resources would occur during construction, there would be no 2040 General Plan or Specific Plan operational impact related to archaeological resources.

Mitigation Measures

MITIGATION MEASURE CR-2: CONDUCT ARCHAEOLOGICAL RESOURCES ASSESSMENT PRIOR TO PROJECT APPROVAL

Prior to approval of a project subject to discretionary review carried out under the 2040 General Plan or Specific Plan that will involve ground disturbance activities in native or previously undisturbed soils that may include, but are not limited to, pavement removal, potholing, grubbing, tree removal, excavation or grading, an archaeological resources assessment shall be prepared under the supervision of an archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in either prehistoric or historic archaeology. Assessments shall include a California Historical Resources Information System (CHRIS) records search at the Northwest Information Center (NWIC) and of the Sacred Lands File Search maintained by the Native American Heritage Commission (NAHC). The records searches shall characterize the results of previous cultural resource surveys and disclose any cultural resources that have been recorded and/or evaluated in and around the project site. A Phase I pedestrian survey shall be undertaken in proposed project areas that are on previously undeveloped land to locate any surface cultural materials. By performing a records search, consultation with the NAHC, and a Phase I survey, a qualified archaeologist shall be able to classify the project area as having high, medium, or low sensitivity for archaeological resources.

If the Phase I archaeological survey identifies resources that may be affected by the project, the archaeological resources assessment shall also include Phase II testing and evaluation. If resources are determined significant or unique through Phase II testing and site avoidance is not possible, appropriate site-specific mitigation measures shall be identified in the Phase II evaluation. These measures shall include, but would not be limited to, a Phase III data recovery program, avoidance, or other appropriate actions to be determined by a qualified archaeologist. If significant archaeological resources cannot be avoided, impacts may be reduced to less-than-significant levels by filling on top of the sites rather than cutting into the cultural deposits. Alternatively, and/or in addition, a data collection program may be warranted, including mapping the location of artifacts, surface collection of artifacts, or excavation of the cultural deposit to characterize the nature of the buried portions of sites. Curation of the excavated artifacts or samples would occur as specified by the archaeologist.

MITIGATION MEASURE CR-3: STOP WORK IN THE EVENT OF UNANTICIPATED CULTURAL RESOURCES DISCOVERIES DURING CONSTRUCTION

If cultural resources are encountered during ground-disturbing activities for a proposed project subject to policies of the 2040 General Plan or Specific Plan, work in the immediate area shall be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology in either prehistoric or historic archaeology shall be contacted immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by the project, additional work such as excavating

the cultural deposit to fully characterize its extent, and collecting and curating artifacts may be warranted to mitigate any significant impacts to cultural resources. In the event that archaeological resources of Native American origin are identified during project construction, a qualified archaeologist will consult with the City to begin Native American consultation procedures.

Level of Significance

Less than significant with mitigation

Effects on Human Remains

Significance Criterion c: Would the proposed plans disturb any human remains, including those interred outside of formal cemeteries?

Impact CR-3 THE DISCOVERY OF HUMAN REMAINS IS ALWAYS A POSSIBILITY DURING GROUND-DISTURBING ACTIVITIES. GROUND DISTURBANCE ASSOCIATED WITH DEVELOPMENT CARRIED OUT UNDER THE 2040 GENERAL PLAN AND SPECIFIC PLAN MAY DISTURB OR DAMAGE KNOWN OR UNKNOWN HUMAN REMAINS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH ADHERENCE TO EXISTING REGULATIONS.

Construction

2040 GENERAL PLAN

Human burials outside of formal cemeteries can occur in prehistoric archaeological contexts. Excavations during construction activities could have the potential to disturb these resources, which could include Native American burial sites. As such, ground disturbing activities that may occur during implementation of the 2040 General Plan have the potential to unearth previously unidentified human remains.

Human burials, in addition to being potential archaeological resources, have specific provisions for treatment in PRC Section 5097. The California Health and Safety Code (Section 7050.5, 7051, and 7054) has specific provisions for the protection of human burial remains. Existing regulations address the illegality of interfering with human burial remains, and protect them from disturbance, vandalism, or destruction. They also include established procedures to be implemented if Native American skeletal remains are discovered. PRC Section 5097.98 also addresses the disposition of Native American burials, protects such remains, and established the NAHC to resolve any related disputes.

All development projects are subject to State of California Health and Safety Code Section 7050.5, which states that, if human remains are unearthed, no further disturbance can occur until the county coroner has made the necessary findings as to the origin and disposition of the remains pursuant to the PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site and make recommendations to the landowner within 48 hours of being granted access. With adherence to these existing regulations, impacts related to human remains would be less than significant.

SPECIFIC PLAN

Human burials outside of formal cemeteries can occur in prehistoric archaeological contexts. Excavations during construction activities could have the potential to disturb these resources, which could include Native American burial sites. As such, ground disturbing activities that may occur during implementation of the Specific Plan have the potential to unearth previously unidentified human remains.

Regulations exist to address the discovery of human remains. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. If an unanticipated discovery of human remains occurs, the county coroner must be notified immediately. If the human remains are determined to be of Native American origin, the coroner will notify the NAHC, which will determine and notify a most likely descendant, who shall complete an inspection of the site and provide recommendations for treatment to the landowner within 48 hours of being granted access. With adherence to existing regulations, impacts would be less than significant.

Operation

Given that potential impacts to human remains would occur during construction, there would be no 2040 General Plan or Specific Plan operational impact related to human remains.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Effects to Tribal Cultural Resources

Significance Criterion d:	Would the proposed plans cause a substantial adverse change in the
	significance of a tribal cultural resource as defined in Public Resources
	Code Section 21074 that is either 1) listed or eligible for listing in the
	California Register of Historical Resources, or in a local register of historical
	resources as defined in Public Resources Code Section 5020.1(k) or 2) a
	resource determined by the lead agency, in its discretion and supported by
	substantial evidence, to be significant pursuant to criteria set forth in
	subdivision (c) of Public Resources Code Section 5024.1?

Impact CR-4 DEVELOPMENT CARRIED OUT UNDER THE 2040 GENERAL PLAN AND SPECIFIC PLAN HAS THE POTENTIAL TO IMPACT UNIDENTIFIED TRIBAL CULTURAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Construction

Ground-disturbing activities associated with individual development projects under both the 2040 General Plan and Specific Plan could expose previously unidentified subsurface archaeological

resources that may qualify as tribal cultural resources and could be adversely affected by future project construction.

2040 GENERAL PLAN

The 2040 General Plan is a high-level planning document, and it remains a possibility that tribal cultural resources may be present within the General Plan area. AB 52 and SB 18 tribal consultation, thus far, has not identified known tribal cultural resources in the General Plan area; however, the SLF results received from the NAHC were positive for Sacred Lands. Adherence to the requirements of AB 52 would require Tribal consultation with local California Native American Tribes prior to implementation of any future project activities that are subject to CEQA. In compliance with AB 52, a determination of whether project-specific substantial adverse effects on tribal cultural resources would occur along with identification of appropriate project-specific avoidance, minimization, or mitigation measures would be required. Future projects facilitated by the 2040 General Plan that are not subject to AB 52 shall adhere to the General Plan policies listed below, which include protection of tribal cultural resources and compliance with AB 52 and SB 18 when applicable.

The Recreation, Arts, and Culture (RAC) Element of the 2040 General Plan includes one goal and two associated policies that address tribal cultural resources.

Goal RAC-4 and several of its associated policies and implementation programs, listed below, would reduce potential impacts to archaeological resources.

- Goal RAC-4 Identify and preserve sites and structures of cultural significance to strengthen City identity, encourage appreciation for history and culture, and contribute to economic vitality.
 - **Policy RAC-4.1** Native American Cultural Resource Protection. The City shall require the preservation and protection of Native American cultural resources, sacred sites, places, features, and objects, including historic or prehistoric ruins, burial grounds, cemeteries, and ceremonial sites, and shall ensure appropriate treatment of Native American and other human remains discovered during a project.
 - **Policy RAC-4.2 Tribal Consultation.** The City shall continue to comply with applicable regulations and requirements by consulting with local California Native American tribes on potential disturbance, recovery, and preservation of tribal cultural resources.

Therefore, implementation of these 2040 General Plan policies would ensure that constructionrelated 2040 General Plan impacts related to tribal cultural resources would be less than significant.

SPECIFIC PLAN

As mentioned above, AB 52 consultation, thus far, has not identified known tribal cultural resources in the Specific Plan area as part of this analysis; however, the SLF results received from the NAHC were positive for Sacred Lands. Any effects on tribal cultural resources can only be known once a specific project has been proposed, because the effects are highly dependent on both the individual project site conditions and the characteristics of the proposed activity. Future projects associated with the Specific Plan would adhere to the goals and policies listed in the 2040 General Plan. While the policies listed in the 2040 General Plan address the protection and preservation of tribal cultural resources, there would still be a potential for development facilitated by the Specific Plan to impact tribal cultural resources. However, implementation of Mitigation Measure CR-4 would protect tribal cultural resources in the event of their discovery on construction sites, construction-related Specific Plan impacts related to tribal cultural resources would be less than significant with mitigation.

Operation

Given that impacts to tribal cultural resources occur during construction, there would be no 2040 General Plan or Specific Plan operational impacts related to tribal cultural resources.

Mitigation Measures

MITIGATION MEASURE CR-4: SUSPEND WORK AROUND TRIBAL CULTURAL RESOURCES IDENTIFIED DURING CONSTRUCTION

In the event that cultural resources of Native American origin are identified during construction of a proposed project implemented under the 2040 General Plan or Specific Plan, all earth-disturbing work in the vicinity of the find shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with State guidelines and in consultation with local Native American group(s). The mitigation plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery.

Level of Significance

Less than significant with mitigation

3.4.5 Cumulative Impacts

The geographic scope of the cumulative cultural and tribal cultural resources analysis is the General Plan and Specific Plan areas and the adjacent areas. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Impact Analysis*) located in Millbrae, Burlingame, South San Francisco, and at the San Francisco International Airport in addition to the proposed plans.

Historical Resources

The combination of the proposed plans as well as the Millbrae Active Transportation Plan and Millbrae Station Area Specific Plan (see Table 3-1) could potentially involve the cumulative demolition or alteration of historical resources. Although Mitigation Measure CR-1 would be required to reduce impacts to these resources to the maximum extent feasible, cumulative development and redevelopment could nonetheless cause the loss of built-environment historical resources. Alteration or demolition of historical resources remains a possibility throughout the plan areas and immediate surroundings with potentially cumulative impacts. As such, the incremental

effect of the 2040 General Plan and Specific Plan would be cumulatively considerable. Therefore, the cumulative impact related to historical resources would be significant and unavoidable.

Archaeological and Tribal Cultural Resources

Development facilitated by the 2040 General Plan and Specific Plan in conjunction with other nearby past, present and reasonably foreseeable future projects listed in Table 3-1 could potentially disturb areas that may contain archaeological and tribal cultural resources. While there is the potential for significant cumulative impacts to archaeological and tribal cultural resources, it is anticipated that potential impacts associated with individual cumulative projects would be addressed and mitigated on a case-by-case basis and would be subject to local and State regulations regarding the protection of such resources. Therefore, the cumulative impact related to archaeological and tribal cultural resources would be less than significant with mitigation.

Overall Level of Cumulative Significance

Significant and unavoidable

3.5 Geology, Soils, and Mineral Resources

3.5.1 Introduction

This section describes the existing geology, soils, and mineral resources in the region and General Plan and Specific Plan areas, as well as the relevant regulatory framework. This section also analyzes the possible impacts related to geology, soils, and mineral resources that could result from implementation of the proposed plans. Information in this section is based on review of the Millbrae General Plan, the United States Geological Survey (USGS), and California Geological Survey, the University of California Museum of Paleontology database, and available information from the City of Millbrae.

3.5.2 Environmental Setting

Geologic Setting

San Mateo County

Millbrae is located in San Mateo County within the Coast Ranges geomorphic province, one of the eleven geomorphic provinces of California.¹ The Coast Ranges extend along the majority of California's coast from the California-Oregon border to Point Arguello in Santa Barbara County in the south and consist of northwest-trending mountain ranges and valleys. The Coast Ranges are composed of Mesozoic and Cenozoic sedimentary, igneous, and metamorphic strata. The eastern side is characterized by strike-ridges and valleys in the upper Mesozoic strata. The Coast Ranges province runs parallel to and overlaps the San Andreas Fault in some areas, including portions of the San Francisco Peninsula west of Millbrae.¹

General Plan Area

As shown on Figure 3.5-1, the General Plan area covers the extent of Millbrae and is underlain by soils that are consistent with alluvial fan deposits of the Pleistocene, Pliocene, Cretaceous to Jurassic, and Holocene eras.

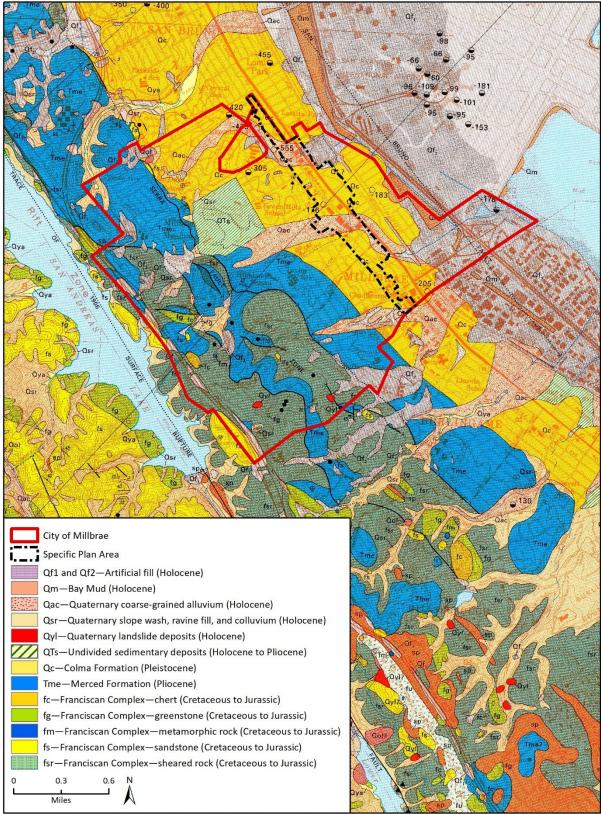
Specific Plan Area

As shown on Figure 3.5-1, the Specific Plan area covers the extent of downtown Millbrae and is underlain by soils that are consistent with alluvial fan deposits of the Pleistocene and Holocene eras.

Existing Soils

Corrosive soils are a geologic hazard, because they react with concrete and ferrous metals, which can cause damage to foundations and buried pipelines. Expansive soils are a geologic hazard, because an increase in soil volume can exert forces on structures and, thus, damage building foundations, walls, and floors. In general, areas are susceptible to differential settlement if underlain by compressible sediments, such as poorly engineered artificial fill or loose unconsolidated alluvial sediments. When these soils dry out and shrink, structural damage can occur.

¹ California Geological Survey (CGS). 2002. Note 36 – California Geomorphic Provinces. https://www.conservation.ca.gov/cgs/Documents/CGS-Note-36.pdf (accessed April 2022)





Pampeyan, E.H. 1994. Geologic map of the Montara Mountain and San Mateo 7.5' quadrangles, San Mateo County, California. United States Geological Survey, Miscellaneous Investigations Series Map I-2390, scale 1:24,000.

General Plan Area

As shown on Figure 3.5-2, the General Plan area lies mostly atop urban land and urban land-Orthents with up to 75 percent slopes in the westernmost areas of Millbrae.

Most of the soils underlying Millbrae are not considered to be expansive. However, there are small pockets of soils in the western portion of Millbrae that are considered to have low to moderate expansive potential in the westernmost areas of Millbrae. These soils include the Candlestick-Kron-Buriburi Complex, the Los Gatos loam, and the Fagan Loam soils.² Soils underlying Millbrae are shown in Figure 3.5-2, with expansive soils shown as cross-hatched areas.

Specific Plan Area

As shown on Figure 3.5-2, the Specific Plan area is lies mostly atop urban land with some urban land – Orthents soils in the northernmost area of the Specific Plan.

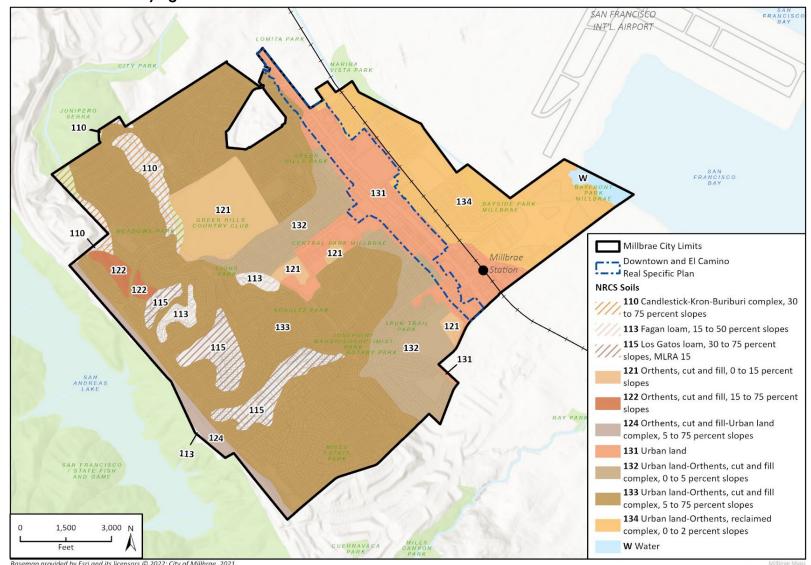
The majority of soils underlying Millbrae are not considered to be expansive. However, there are small pockets of soils in the western portion of Millbrae that are considered to have low to moderate expansive potential. These soils include the Candlestick-Kron-Buriburi Complex, the Los Gatos loam, and the Fagan Loam soils.³ The Specific Plan area is not underlain by expansive soils.

Seismicity

The term seismicity describes the effects of seismic waves that are radiated from an earthquake fault in motion. While most of the energy released during an earthquake results in the permanent displacement of the ground, as much as 10 percent of the energy may dissipate immediately in the form of seismic waves. Seismicity can result in seismic-related hazards such as fault rupture, ground shaking, and liquefaction. Faults form in rocks when stresses overcome the internal strength of the rock, and fault rupture occurs when movement on a fault breaks through to the surface and can result in damage to infrastructure and persons. Ground movement during an earthquake can vary depending on the overall magnitude, distance to the fault, focus of earthquake energy, and type of geologic material. The composition of underlying soils, even those relatively distant from faults, can intensify ground shaking. Strong ground shaking from an earthquake can result in damage, with buildings shifted off their foundations and underground pipes being broken. Liquefaction occurs when an earthquake causes ground shaking that result in saturated soil losing shear strength, deforming, and acting like a liquid. When liquefaction occurs, it can result in ground failure that can result in damage to roads, pipelines, and buildings

The San Francisco Bay Area contains numerous active earthquake faults. Because of the presence of nearby active faults, the San Francisco Bay Area is considered seismically active. Numerous small earthquakes occur every year in the San Francisco Bay Area, and larger earthquakes have been recorded and can be expected to occur in the future. According to the third version of Uniform California Earthquake Forecast (UCERF 3), there is an aggregated 98 percent probability of a moment magnitude 6.0 (Richter scale) or greater earthquake occurring in the plan area on an active Bay Area fault over the next 30 years.

 ² Millbrae, City of. 2016. Existing Conditions Report – Public Review Draft: Chapter 8, Hazards and Safety. August 2016. https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed April 2022)
 ³ Millbrae, City of. 2016. Existing Conditions Report – Public Review Draft: Chapter 8, Hazards and Safety. August 2016. https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed April 2022)





Basemap provided by Esri and its licensors © 2022; City of Millbrae, 2021. Additional data provided by NRCS, 2021. Millbrae Maps Fig 3.5-2 Expansive Soils

San Mateo County Area

The San Francisco Bay Area is a region of high seismic activity. San Mateo County has been subjected to numerous seismic events, originating both on faults within the County and in other parts of the region. Six major Bay Area earthquakes have occurred since 1800 that affected the County, and at least two of the faults that produced them run through or into the County. These earthquakes and the originating faults include the 1836 and 1868 earthquakes on the Hayward Fault, and the 1861 earthquake on the Calaveras Fault. Two earthquakes, in 1838 and 1906, originated on the San Andreas Fault, while one earthquake (with two major shocks) occurred in 1872 and was centered in the Vacaville-Winters area of Solano County. These latter events likely occurred on a thrust fault and are not known to have been accompanied by surface fault rupture. A smaller earthquake, centered near Collinsville in Solano County on a fault of uncertain identity, occurred in 1889. The Loma Prieta earthquake, of 6.9 magnitude⁴, occurred in October 1989. The epicenter of which was located on the San Andrea fault roughly 56 miles south of San Francisco, 10 miles northeast of Santa Cruz, near Mt. Loma Prieta in the Santa Cruz Mountains.

Using the available data and information, an earthquake probability estimate has been developed for San Mateo County and is shown in Table 3.5-1.

Causative Fault	Magnitude	Approximate Probability of Occurrence (over a 50-year period)
San Andreas	7.0–8.0	Likely ¹
	8.0-8.5	Intermediate ²
Hayward	6.0–7.0	Likely
	7.0–7.5	Intermediate
Calaveras	6.0–7.0	Likely
	7.0–7.5	Intermediate-Low ³
Concord	5.0-6.0	Likely
	6.0–7.0	Intermediate-Low
Antioch	5.0–6.0	Likely
	6.0–7.0	Intermediate-Low

 Table 3.5-1
 Approximate Probability of Occurrence of Earthquake on Bay Area Faults

Notes:

¹ Greater than 50 percent probability of occurrence

² A 15-50 percent probability of occurrence

³ Less than 15 percent probability of occurrence

Source: Contra Costa County Conservation and Development Department estimates

General Plan Area and Specific Plan Area

Like most cities in the region, Millbrae is subject to risks associated with potentially destructive earthquakes. Earthquakes are most common along geologic faults that are planes of weakness or fractures along which rocks have been displaced. There are four major faults in proximity to the city of Millbrae, the San Andreas Fault, San Gregorio Fault, Hayward Fault, and Calaveras Fault. The nearest major fault to Millbrae is the San Andreas Fault, which passes within one mile west of

⁴ California Geological Survey (CGS). 2019. The 1989 Loma Prieta Earthquake. https://www.conservation.ca.gov/cgs/earthquakes/lomaprieta (accessed July 2022).

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Millbrae in a north to south direction. The Serra Fault, which is considered an active fault by the City of Millbrae, is the nearest fault to Millbrae and runs parallel to the San Andreas Fault and nearly bisects Millbrae.⁵ Neither the San Andreas Fault nor the Serra Fault run through the Specific Plan area. Faults within and near the General Plan area and Specific Plan area are shown in Figure 3.5-3.

Seismic Hazards and Areas

Surface Rupture

Surface rupture represents the breakage of ground along the surface trace of a fault, which is caused by the intersection of the fault surface area ruptured in an earthquake with the earth's surface. Fault displacement occurs when material on one side of a fault moves relative to the material on the other side of the fault. This can have particularly adverse consequences when buildings are located within the rupture zone. It is not feasible, from a structural or economic perspective, to design and build structures that can accommodate rapid displacement involved with surface rupture. Amounts of surface displacement can range from a few inches to tens of feet during a rupture event.

Faults are geologic hazards because of both surface fault displacement and seismic ground shaking that are distinct but related properties. Surface fault displacement results when the fault plane ruptures and that rupture surface extends to, or intersects, the ground surface. Surface fault rupture can be very destructive to structures constructed across active faults. However, the zone of damage is limited to a relatively narrow area along either side of the fault as opposed to seismic ground shaking damage that can be quite widespread. Faults are categorized as active, potentially active, and inactive. A fault is classified as active if it has moved during the Holocene time, which consists of approximately the last 11,000 years. A fault is classified as potentially active if it has experienced movement within Quaternary time, which is during the last 1.8 million years. Faults that have not moved in the last 1.8 million years are generally considered inactive.

GENERAL PLAN AREA

Within the General Plan area, the Serra fault is not considered to be an active fault line with potential for surface rupture per the United States Geological Survey. The closest active fault zone outside of the General Plan area is the San Andreas Fault Zone – Peninsula, located approximately one mile from Millbrae's western boundary.⁶

SPECIFIC PLAN AREA

No active fault line with potential for surface rupture exists within the Specific Plan area. The closest active fault zone outside of the Specific Plan area is the San Andreas Fault Zone – Peninsula, located approximately one mile from the Specific Plan area's western boundary.

 ⁵ Millbrae, City of. 2016. Existing Conditions Report – Public Review Draft: Chapter 8, Hazards and Safety. August 2016. https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed April 2022)
 ⁶ Millbrae, City of. 2016. Existing Conditions Report – Public Review Draft: Chapter 8, Hazards and Safety. August 2016. https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed April 2022)

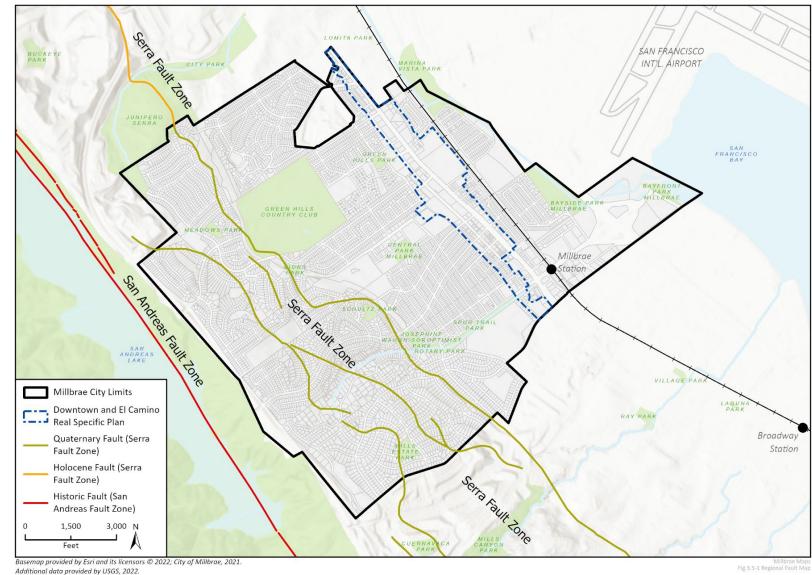


Figure 3.5-3 Faults Within and Near Millbrae

Ground Shaking

In addition to surface rupture, the major cause of structural damage from earthquakes is ground shaking. The intensity of ground motion expected at a particular site depends upon the magnitude of the earthquake, the distance to the epicenter, and the geology of the area between the epicenter and the property. Greater movement can be expected at sites located on poorly consolidated material, such as alluvium, within close proximity to the ruptured fault, or in response to a seismic event of great magnitude.

GENERAL PLAN AREA

Millbrae has been impacted by ground shaking during major earthquakes in the seismically active San Francisco Bay Area region, and is likely to experience ground shaking from major earthquakes in the future. Due to the proximity of the Serra Fault and the San Andreas Fault, the Association of Bay Area Governments (ABAG) Resiliency Program has identified the ground-shaking potential in Millbrae as "violent." Groundshaking would be most intense resulting from an earthquake originating from any of the other nearby faults have the potential to create significant groundshaking throughout the city. The eastern portion of Millbrae has been mapped by the United States Geologic Survey (USGS) as being underlain by soil type E, or water saturated mud and artificial fill. This soil type is expected to have the strongest amplification of groundshaking during an earthquake event compared to the more stable soils underlying the western portion of Millbrae.⁷

SPECIFIC PLAN AREA

The eastern portion of Millbrae has been mapped by the United States Geologic Survey (USGS) as being underlain by soil type E, or water saturated mud and artificial fill. This soil type is expected to have the strongest amplification of groundshaking during an earthquake event compared to the more stable soils underlying the western portion of Millbrae.⁸ The easternmost portion of the Specific Plan area is underlain by soil type E.

Liquefaction

Liquefaction is a seismic phenomenon in which loose, saturated granular and non-plastic finegrained soils lose their structure/strength when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: 1) shallow groundwater within the top 50 feet of the ground surface; 2) low-density non-plastic soils; and 3) high-intensity ground motion.

GENERAL PLAN AREA

Bay mud underlies the eastern portion of General Plan area near the San Francisco Bay and is considered to have very high susceptibility to experience liquefaction.⁹¹⁰¹¹

 ⁷ Millbrae, City of. 2016. Existing Conditions Report – Public Review Draft: Chapter 8, Hazards and Safety. August 2016. https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed April 2022)
 ⁸ Millbrae, City of. 2016. Existing Conditions Report – Public Review Draft: Chapter 8, Hazards and Safety. August 2016. https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed April 2022)
 ⁹ Millbrae, City of. 2016. Existing Conditions Report – Public Review Draft: Chapter 8, HazardsSafety.pdf (accessed April 2022)
 ⁹ Millbrae, City of. 2016. Existing Conditions Report – Public Review Draft: Chapter 8, Hazards and Safety. August 2016.

https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed April 2022)

¹¹ Millbrae, City of. 2016. Existing Conditions Report – Public Review Draft: Chapter 8, Hazards and Safety. August 2016. https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed April 2022)

SPECIFIC PLAN AREA

The centermost area along El Camino Real within the Specific Plan area is identified as being within a very high liquefaction zone. Most of the Specific Plan area is identified as being within a very low liquefaction hazard area.

Landslides and Slope Stability

Seismic ground shaking can also result in landslides and other slope instability issues. Landslides occur when slopes become unstable and masses of earth material move downslope. Landslides are usually rapid events, often triggered during periods of rainfall or by earthquakes. Mudslides and slumps are a more-shallow type of slope failure. They typically affect the upper surficial soil horizons rather than bedrock features. Usually, mudslides and slumps occur during or soon after periods of rainfall, but they can be triggered by seismic shaking. The areas most susceptible to landslides are shown on maps prepared by the California Division of Mines and Geology. In addition, landslides occur where faults have fractured rock and along the base of slopes or cliffs where supporting material has been removed by stream or wave erosion, or human activities. Heavy rainfall, human actions, or earthquakes can trigger landslides. They may take the form of a slow continuous movement such as a slump or may move very rapidly as a semi-liquid mass such as a debris flow or avalanche.

GENERAL PLAN AREA

The General Plan area is not located in a State designated earthquake induced landslide hazard zone, but it is identified within the ABAG Resilience Program as having had past landslides on the steeper slopes throughout the western portion of Millbrae.¹²

SPECIFIC PLAN AREA

The Specific Plan area is not in a State designated earthquake induced landslide hazard zone, but it is identified within the ABAG Resilience Program as having had past landslides in the steeper slopes throughout the western portion of the city.¹³ There are no steep slopes within the Specific Plan area, and landslide susceptibility is low.

Subsidence

Subsidence or settlement can occur from immediate settlement, consolidation, shrinkage of expansive soil, and liquefaction. Immediate settlement occurs when a load from a structure or placement of new fill material is applied, causing distortion in the underlying materials. This settlement occurs quickly and is typically complete after placement of the final load. Consolidation settlement occurs in saturated clay from the volume change caused by squeezing out water from the pore spaces. Consolidation occurs over a period of time and is followed by secondary compression, which is a continued change in void ratio under the continued application of the load. Soils tend to settle at different rates and by varying amounts depending on the load weight or changes in properties over an area, which is referred to as differential settlement. Areas underlain by soft sediments or undocumented fills are most prone to settlement.

 ¹² Millbrae, City of. 2016. Existing Conditions Report – Public Review Draft: Chapter 8, Hazards and Safety. August 2016. https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed April 2022)
 ¹³ Millbrae, City of. 2016. Existing Conditions Report – Public Review Draft: Chapter 8, Hazards and Safety. August 2016. https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed April 2022)

GENERAL PLAN AREA

Within the General Plan area, bay mud underlies the eastern portion of the city near San Francisco Bay and may experience subsidence. When fill or structure loads are placed on these muds for development, flood control, or other purposes, settlement can result.

SPECIFIC PLAN AREA

Within the Specific Plan area, Bay mud underlies theses eastern portion of the city near San Francisco Bay and may experience subsidence. When fill or structure loads are placed on these muds for development, flood control, or other purposes, settlement can result. The easternmost portion of the Specific Plan area is susceptible to subsidence.

Slope Disturbance

Slope disturbance from long-term geologic cycle of uplift, mass wasting, intense precipitation or wind, and gravity can result in slope failure in the form of mudslides and rock fall. Mass wasting refers to a variety of erosional processes from gradual downhill soil creep to mudslides, debris flows, landslides, and rock fall—processes that are commonly triggered by intense precipitation or wind, which varies according to climactic shifts. Often, various forms of mass wasting are grouped together as landslides, which are generally used to describe the downhill movement of rock and soil. Soil creep is a long-term, gradual downhill migration of soil under the influence of gravity and is generally on the order of a fraction of an inch per year. These soils can creep away downslope sides of foundations and reduce lateral support.

General Plan Area

The General Plan area does not contain active faults that would cause geologic uplifting. According to the Landslide Susceptibility to Deep-Seated Landslides Figure 12-2 in the San Mateo County Hazard Mitigation Plan, Millbrae is located in an area designated as having a "moderate" to "high" risk for landslides in the western portion of Millbrae.

Millbrae is not in a State-designated earthquake induced landslide hazard zone, but it is identified within the ABAG Resilience Program as having had past landslides on the steeper slopes throughout the western portion of Millbrae.¹⁴

Specific Plan Area

The Specific Plan area consists of gentle sloping from the west to east. According to the Landslide Susceptibility to Deep-Seated Landslides Figure 12-2 in the San Mateo County Hazard Mitigation Plan, Millbrae is located in an area designated as having a "moderate" to "high" risk for landslides in the western portion of the Specific Plan area.

¹⁴ Millbrae, City of. 2016. Existing Conditions Report – Public Review Draft: Chapter 8, Hazards and Safety. August 2016. https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed April 2022)

Paleontological Resources

Definitions

UNIQUE PALEONTOLOGICAL RESOURCES

Paleontological resources, or fossils, are the remains and traces of prehistoric life. Fossils are typically preserved in layered sedimentary rocks and the distribution of fossils is a result of the sedimentary history of the geologic units within which they occur. Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. Although it is not possible to determine whether a fossil will occur in any specific location, it is possible to evaluate the potential for geologic units to occur within Millbrae.

To determine the uniqueness of a given paleontological resource, it must first be identified or recovered (i.e., salvaged). CEQA does not define "a unique paleontological resource or site." However, the Society of Vertebrate Paleontology (SVP) has defined a "significant paleontological resource" in the context of environmental review as follows:

Fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are typically older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years) (SVP 2010).

PALEONTOLOGICAL RESOURCES SENSITIVITY

Absent specific agency guidelines, most professional paleontologists in California adhere to guidelines set forth by the SVP¹⁵ in "Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources." These guidelines establish detailed protocols for the assessment of the paleontological resource potential, or "sensitivity" of a project area and outline measures to follow in order to mitigate adverse impacts to known or unknown fossil resources during project development. Using baseline information gathered during a paleontological resource assessment, the paleontological resource potential of the geologic unit(s) or members thereof underlying a project area can be assigned to a high, undetermined, low, or no paleontological sensitivity category, as defined by SVP.¹⁵ This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. While these standards were specifically written to protect vertebrate paleontological resources, all fields of paleontology have adopted these guidelines.

Significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, rare, diagnostically important, or are common but have the potential to provide valuable scientific information for evaluating evolutionary patterns and geologic processes. New or unique specimens can provide new insights into evolutionary history; however, additional specimens of even well represented lineages can be equally important for studying evolutionary pattern and process, and evolutionary rates. Even unidentifiable material can provide useful data for dating geologic units if radiocarbon dating is possible. As such, common fossils, especially vertebrates, may be scientifically important, and therefore considered highly significant.

¹⁵ Society of Vertebrate Paleontology (SVP). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee.

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In general, for geologic units with high sensitivity, full-time monitoring is recommended during any project-related ground disturbance. For geologic units with low sensitivity, protection or salvage efforts are not required. For geologic units with undetermined sensitivity, field surveys by a qualified paleontologist are usually recommended to specifically determine the paleontological potential of the rock units present within the study area. For geologic units with no sensitivity, a paleontological monitor is not required.

Paleontological Resources Sensitivity in General Plan Area and Specific Plan Area

Rincon assessed the paleontological sensitivity of each of the thirteen geologic units underlying the General Plan area (three of which also underlie the Specific Plan area) according to SVP guidelines.¹⁵ The sensitivity assignments were made based on review of primary scientific literature, geologic maps, and online fossil databases.

Millbrae is located within the *Montara Mountain* United States Geological Survey 7.5-minute topographic quadrangle. The regional geology was mapped at a scale of 1:24,000 by Pampeyan,¹⁶ who identified 13 distinct geologic units underlying the 2040 General Plan area (Figure 3.5-1) and listed below. According to the geologic map by Pampeyan,² the Specific Plan area is underlain by three geologic units as shown in Figure 3.5-3 and listed below:

- Artificial fill (Qf1)
- Quaternary coarse-grained alluvium (Qac)
- Colma Formation (Qc)

The geographic distribution, age, characteristics, and paleontological sensitivity of each of these geologic units is discussed below.

ARTIFICIAL FILL (QF1 AND QF2)

Artificial fill consists of sediment that has been deposited by humans to change the natural grade of the land. Pampeyan¹⁶ distinguishes between two types of artificial fill (Qf1 and Qf2) differing in that Qf2 is generally locally derived. Qf1 and Qf2 are found throughout the City of Millbrae including within the Specific Plan area (Figure 3.5-1). Qf1 and Qf2 were deposited by human activities and, therefore, cannot preserve paleontological resources. Accordingly, these units are assigned no paleontological sensitivity.

BAY MUD (QM)

Bay mud (Qm) consists of blue-gray to black, bedded to massive, poorly to well-consolidated, silty clay with interspersed layers of sand, gravel, peat, and preserved shells.¹⁶ Qm is found in eastern Millbrae, near San Francisco Bay and San Francisco International Airport, surrounded by Qf1 deposits. (Figure 3.5-1). Pampeyan² notes that Qm may be up to 100 feet thick near San Francisco International Airport. Qm is mapped as Holocene, and its thickness suggests a high sedimentation rate, meaning that the depth at which sediments become old enough to preserve scientifically significant paleontological resources (i.e., 5,000 years old³) is likely very deep. Therefore, Qm has low paleontological sensitivity.

¹⁶ Pampeyan, E.H. 1994. Geologic map of the Montara Mountain and San Mateo 7.5' quadrangles, San Mateo County, California. United States Geological Survey, Miscellaneous Investigations Series Map I-2390, scale 1:24,000.

QUATERNARY COARSE-GRAINED ALLUVIUM (QAC)

Quaternary coarse-grained alluvium (Qac) consists of unconsolidated, moderately sorted sand and gravel that may contain local silt and sand lenses and is Holocene in age.² Qac represents stream levees, alluvial fans, and flood plains and is found in several places within Millbrae including the Specific Plan area (Figure 3.5-1). Qac varies in thickness, and cross-sections included in Pampeyan² suggests that Qac is approximately 75 feet thick beneath Millbrae. Holocene units are generally considered too young to preserve scientifically significant paleontological resources.³ Therefore, Qac has a low paleontological sensitivity.

QUATERNARY SLOPE WASH, RAVINE FILL, AND COLLUVIUM (QSR)

Quaternary slope wash, ravine fill, and colluvium (Qsr) consists of unconsolidated to moderately consolidated, poorly sorted silt, clay, sand, and larger rock fragments that represent slow downslope movement of weathered bedrock.² Qsr is found in several areas of western Millbrae (Figure 3.5-1). Qsr deposits are Holocene in age and less than 20 feet thick.² Qsr deposits are actively being deposited, making them too young to preserve paleontological resources, and furthermore, their coarse-grained nature makes them unlikely to preserve biological remains. Therefore, Qsr has low paleontological sensitivity.

QUATERNARY LANDSLIDE DEPOSITS (QYL)

Quaternary landslide deposits (Qyl) are unconsolidated to moderately consolidated deposits with varying compositions that depend on their source rock and the type of landslide.² Several areas mapped as Qyl are found in southwestern Millbrae (Figure 3.5-1), but Pampeyan² noted that other landslides, too small to map, are present in the region. Qyl represents Holocene landslides, meaning that they are likely too young to preserve paleontological resources, and their coarse-grained nature makes them unlikely to preserve biological remains. Therefore, Qyl has low paleontological sensitivity.

UNDIVIDED SEDIMENTARY DEPOSITS (QTS)

A portion of central Millbrae is mapped as undivided sedimentary deposits (QTs) (Figure 3.5-1). In this area, grading and development have obscured all geologic contacts.² This area likely includes several geologic units ranging in age from Holocene to Pliocene and low to high paleontological sensitivity. Given that certain areas mapped as QTs are underlain by geologic units with high paleontological sensitivity, QTs is also assigned high paleontological sensitivity.

COLMA FORMATION (QC)

The Colma Formation (Qc) consists of yellowish-gray and tan, weakly consolidated, moderately wellbedded, sandy clay and silty sand and light-brown to reddish-brown, friable, poorly sorted to wellsorted, bedded sand and gravel with occasional cross-bedding and rounded chert pebbles.² The Colma Formation underlies large areas of eastern and northern Millbrae including the Specific Plan area (Figure 3.5-1). The Colma Formation is Pleistocene in age, but no fossil localities are reported from it.^{17,18,19} Due to its lack of fossil producing history, the Colma Formation is assigned low paleontological sensitivity.

MERCED FORMATION (TME)

The Merced Formation consists of yellowish- to grayish-orange when weathered or bluish-gray when fresh, moderately consolidated to friable, thick-bedded to massive, fine sandstone, clayey sandstone, or siltstone.² The Merced Formation is Pliocene in age and has produced dozens of fossil localities in San Mateo County, yielding taxa such as mammoth (*Mammuthus*), whale and dolphin (Cetacea), sloth (Pilosa), sea otter (*Enhydra*), and invertebrates (Bivalvia, Gastropoda, Echinoidea).^{5,6} Large areas of western Millbrae are underlain by the Merced Formation (Figure 3.5-1). Due to this fossil-producing history the Merced Formation has high paleontological sensitivity.

CHERT OF FRANCISCAN COMPLEX (FC)

The Franciscan Complex is a group of sedimentary, igneous, and metamorphic rocks that are Cretaceous to Jurassic in age and found throughout the Coast Ranges. Chert deposits belonging to the Franciscan Complex (fc) consist of white, grayish-green, yellowish-orange, and brown, brittle radiolarian chert that commonly contains reddish-brown shale interbeds.² Western Millbrae contains a few areas mapped as fc (Figure 3.5-1). Invertebrate fossils (mollusks and echinoderms) are known from the sedimentary rocks of the Franciscan Complex, but vertebrate fossils are rare, though one of the few marine reptile fossils from the Franciscan Complex, an *Ichthyosaurus*, came from chert.^{18,19,20} Due to the rarity of scientifically significant fossils in the Franciscan Complex, fc has low paleontological sensitivity.

GREENSTONE (FG) AND METAMORPHIC ROCKS (FM) OF FRANCISCAN COMPLEX

The Franciscan Complex is a group of sedimentary, igneous, and metamorphic rocks that are Cretaceous to Jurassic in age and found throughout the Coast Ranges. Greenstone in the Franciscan Complex (fg) consists of dark green to red, metamorphosed basaltic igneous rocks including flows, tuffs, and pillow lava.² Areas mapped as metamorphic rock of the Franciscan Complex (fm) by Pampeyan² generally consist of dusky blue, brownish-gray, or grayish-green rocks such as blueschist or gneiss. The western edge of Millbrae contains areas mapped as fg and fm (Figure 3.5-1). Metamorphic rocks, and the basaltic rocks from which greenstone originates, cannot preserve fossils due to the intense heat and pressure necessary for their formation. Therefore, fg and fm have no paleontological sensitivity.

SANDSTONE OF FRANCISCAN COMPLEX (FS)

The Franciscan Complex is a group of sedimentary, igneous, and metamorphic rocks that are Cretaceous to Jurassic in age and found throughout the Coast Ranges. Sandstone deposits belonging to the Franciscan Complex (fs) consist of grayish-orange when weathered and greenish-gray when fresh, poorly sorted, medium- to coarse-grained sandstone that is locally tuffaceous.² Western Millbrae contains a few areas mapped as fs (Figure 3.5-1). Invertebrate fossils (mollusks and echinoderms) are known from the sedimentary rocks of the Franciscan Complex, but vertebrate

¹⁷ Jefferson, G.T. 2010. A catalogue of late Quaternary vertebrates from California. Natural History Museum of Los Angeles County Technical Report 7: 5-172.

¹⁸ Paleobiology Database. 2022. The Paleobiology Database http://paleobiodb.org/ (Accessed March 2022)

¹⁹ University of California Museum of Paleontology. 2022. UCMP online database specimen search portal, http://ucmpdb.berkeley.edu/ (Accessed March 2022)

²⁰ Camp, C.L. 1942. Ichthyosaur rostra from central California. Journal of Paleontology 16(3), pp. 362–371.

fossils are rare.^{5,6} Due to the rarity of scientifically significant fossils in the Franciscan Complex, fs has low paleontological sensitivity.

SHEARED ROCK OF FRANCISCAN COMPLEX (FSR)

The Franciscan Complex is a group of sedimentary, igneous, and metamorphic rocks that are Cretaceous to Jurassic in age and found throughout the Coast Ranges. Sheared rock of the Franciscan Complex (fsr) is predominantly light or dark gray, sheared shale, siltstone, and sandstone with variously sized inclusions of other Franciscan sedimentary, igneous, and metamorphic rocks.² Much of western Millbrae is underlain by fsr (Figure 3.5-1). Invertebrate fossils (mollusks and echinoderms) are known from the sedimentary rocks of the Franciscan Complex, but vertebrate fossils are rare.^{5,6} Due to the rarity of scientifically significant fossils in the Franciscan Complex, fsr has low paleontological sensitivity.

3.5.3 Regulatory Framework

Federal Regulations

National Earthquake Hazards Reduction Program

The National Earthquake Hazards Reduction Program was established by the U.S. Congress when it passed the Earthquake Hazards Reduction Act of 1977, Public Law 95-124. In establishing the National Earthquake Hazards Reduction Program, Congress recognized that earthquake-related losses could be reduced through improved design and construction methods and practices, land use controls and redevelopment, prediction techniques and early warning systems, coordinated emergency preparedness plans, and public education and involvement programs. The four basic goals remain unchanged:

- Develop effective practices and policies for earthquake loss reduction and accelerate their implementation.
- Improve techniques for reducing earthquake vulnerabilities of facilities and systems.
- Improve earthquake hazards identification and risk assessment methods, and their use.
- Improve the understanding of earthquakes and their effects.

Several key federal agencies contribute to earthquake mitigation efforts. There are four primary National Earthquake Hazards Reduction Program agencies:

- National Institute of Standards and Technology of the Department of Commerce
- National Science Foundation
- USGS of the Department of Interior
- Federal Emergency Management Agency (FEMA) of the Department of Homeland Security

Implementation of National Earthquake Hazards Reduction Program priorities is accomplished primarily through original research, publications, and recommendations to assist and guide state, regional, and local agencies in the development of plans and policies to promote safety and emergency planning.

U.S. Geological Survey Landslide Hazard Program

The USGS created the Landslide Hazard Program in the mid-1970s; the primary objective of the program is to reduce long-term losses from landslide hazards by improving our understanding of the causes of ground failure and suggesting mitigation strategies. The federal government takes the lead role in funding and conducting this research, whereas the reduction of losses due to geologic hazards is primarily a State and local responsibility. In San Mateo County, plans and programs designed for the protection of life and property are coordinated by the San Mateo County Office of Emergency Services.

Clean Water Act

Congress enacted the Clean Water Act (CWA), formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). NPDES permitting authority is administered by the California State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCB). The City of Millbrae is located within the San Francisco Bay RWQCB jurisdiction.

Projects within the City that disturb more than one acre are required to obtain NPDES coverage under the California General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) describing best management practices (BMPs) the discharger would use to prevent and retain storm water runoff and to prevent soil erosion.

23 U.S. Code Section 305 - Archaeological and Paleontological Salvage

Statute 23 USC 305 amends the Antiquities Act of 1906. Specifically, it states:

Funds authorized to be appropriated to carry out this title to the extent approved as necessary, by the highway department of any State, may be used for archaeological and paleontological salvage in that state in compliance with the Act entitled "An Act for the preservation of American Antiquities," approved June 8, 1906 (PL 59-209; 16 USC 431-433), and State laws where applicable.

This statute allows funding for mitigation of paleontological resources recovered pursuant to federal aid highway projects, provided that "excavated objects and information are to be used for public purposes without private gain to any individual or organization" (Federal Register [FR] 46(19): 9570).

State Regulations

California Code of Regulations, Title 24, Part 2 - California Building Code

The California Building Code (CBC) is contained in the California Code of Regulations, Title 24, Part 2, which is a portion of the California Building Standards Code. Title 24 is assigned to the California Building Standards Commission, which by law is responsible for coordinating all building standards. The CBC incorporates by reference the federal Uniform Building Code with necessary California

amendments. The CBC is the regulatory tool that includes building code standards to address geologic and seismic hazards. Chapter 16 of the CBC contains definitions of seismic sources and the procedure used to calculate seismic forces on structures.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 was passed into law following the destructive February 9, 1971, magnitude 6.6 San Fernando earthquake. The Act provides a mechanism for reducing losses from surface fault rupture on a Statewide basis. The intent of the Act is to ensure public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. This Act groups faults into categories of active, potentially active, and inactive. Historic and Holocene age faults are considered active, Late Quaternary and Quaternary age faults are considered potentially active, and pre-Quaternary age faults are considered inactive.

The Alquist-Priolo Earthquake Fault Zoning Act regulates development near the surface traces of active faults to mitigate the hazard of surface fault rupture. Essentially, this Act contains two requirements: (1) it prohibits the location of most structures for human occupancy across the trace of active faults; and (2) it establishes Earthquake Fault Zones and requires geologic/seismic studies of most proposed development within 50 feet of the zone. The Earthquake Fault Zones are delineated and defined by the State Geologist and identify areas where potential surface rupture along a fault could occur. The nearest Alquist-Priolo Earthquake Fault Zone is located along the San Andreas Fault west of the City of Millbrae.²¹

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (the Act) of 1990 was passed into law following the destructive October 17, 1989, magnitude 6.9 Loma Prieta earthquake.²² The Act directs the CGS to delineate Seismic Hazard Zones. The purpose of the Act is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards, such as liquefaction, landslides, amplified ground shaking, and inundation by tsunami or seiche. Cities, counties, and State agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. The Act requires that site-specific geotechnical investigations be performed prior to permitting most urban development projects within seismic hazard zones. CGS maintains these required maps.

California Public Resources Code Section 5097.5

Section 5097.5 of the Public Resources Code states:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

²¹ California Department of Conservation (DOC). 2022. Alquist-Priolo Fault Hazard Zones [map].

https://gis.data.ca.gov/maps/ee92a5f9f4ee4ec5aa731d3245ed9f53/explore?location=37.609765%2C-122.389578%2C12.92 (accessed May 2022)

²² California Geological Survey (CGS). 2019. The 1989 Loma Prieta Earthquake. https://www.conservation.ca.gov/cgs/earthquakes/lomaprieta (accessed July 2022).

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Here "public lands" means those owned by, or under the jurisdiction of, the State or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with Public Resources Code Section 5097.5 for their own activities, including construction and maintenance, and for permit actions (e.g., encroachment permits) undertaken by others.

Regional and Local Regulations

San Mateo County Hazard Mitigation Plan

The San Mateo County Hazard Mitigation Plan, adopted July 2016, assesses the County's vulnerabilities to various hazards and presents mitigation strategy, including goals, objectives, and actions that the County will strive to implement over the next five years. These hazards include earthquakes and landslides. The hazard mitigation plan seeks to identify opportunities for reasonable mitigation actions and sets out a five-year implementation plan.

Millbrae Municipal Code

Chapter 9.45 of the Millbrae Municipal Code regulates all grading within Millbrae and amends the requirements of the California Building Code Appendix Chapter 33 and establishes requirements for grading permits, procedures for issuing permits, specifies minimum standards for grading and removal of vegetation, including protected trees, and provides enforcement of grading requirements.

Millbrae General Plan

The current Millbrae General Plan contains policies related to geology and soils, but they would be replaced by the proposed 2040 General Plan.

3.5.4 Impacts and Mitigation Measures

Significance Criteria

The City of Millbrae utilizes the following 2022 CEQA Guidelines Appendix G significance criteria questions related to Geology/Soils and Mineral Resources.

Would the 2040 General Plan or Specific Plan:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - 1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
 - 2. Strong seismic ground shaking?
 - 3. Seismic-related ground failure, including liquefaction?
 - 4. Landslides?
- b) Result in substantial soil erosion or the loss of topsoil?
- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirectly risks to life or property?
- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- g) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the State?
- h) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Approach to Analysis

Geology/Soils

Evaluations of potential geologic and soil impacts of the proposed plans were based on review of available documentation, including the Millbrae General Plan; the San Mateo County Multijurisdictional Local Hazard Mitigation Plan; USGS "Shake Map" webpage; the United States Department of Agriculture Natural Resources Conservation Service Web Soil Survey; and the Association of Bay Area Governments (ABAG), California Geological Survey, and USGS data and publications.

Paleontological Resources

Evaluations of potential paleontological impacts of the proposed plans were based on review of available documentation, including the Society of Vertebrate Paleontology, the University of California Museum of Paleontology, and available data from the City of Millbrae

Mineral Resources

Evaluations of potential mineral resources impacts of the proposed plans were based on review of available documentation, including the California Department of Conservation Mineral Land Classification.

EIR Scoping Comments Consideration

No comments relevant to CEQA were received in response to the EIR NOP specific to geology, soils, and mineral resources that need to be addressed in the impacts discussion.

Specific Thresholds of Significance

For purposes of this analysis, the following thresholds are used to evaluate the significance of geology, soils, and mineral resources impacts resulting from implementation of the proposed plans.

- Place structures on or within the State designated zone of a known earthquake fault.
- Place structures where seismic ground shaking of a Strong level or greater according to the Mercalli Scale could occur.
- Place structures on soils prone to any level of liquefaction.
- Place structures on slopes greater than 15 percent or soils susceptible to failure as defined by the USGS.

- Place structures in areas without impervious surfaces or vegetation, or on slopes greater than 15 percent.
- Place structures on a geologic unit or soil that is unstable or that could become unstable.
- Place structures on expansive soil that has an expansion index greater than 20 as defined in Table 18-1-B of the Uniform Building Code (1994).
- Place septic tanks or alternative wastewater disposal systems on soils incapable of supporting the use.
- Physically damage or destroy paleontological deposits.

Impact Evaluation

Effects of Earthquake Fault Rupture

Significance Criterion a1:	Would the proposed plans directly or indirectly cause potential
	substantial adverse effects, including the risk of loss, injury, or death
	involving rupture of a known earthquake fault, as delineated on the most
	recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State
	Geologist for the area or based on other substantial evidence of a known
	fault?

Impact GEO-1 NEITHER THE 2040 GENERAL PLAN NOR THE SPECIFIC PLAN ARE LOCATED WITHIN AN ALQUIST PRIOLO EARTHQUAKE FAULT ZONE, AND, THEREFORE, THE PROPOSED PLANS WOULD NOT BE SUBJECT TO EFFECTS INVOLVING RUPTURE OF A KNOWN EARTHQUAKE FAULT. THERE WOULD BE NO IMPACT.

Construction

Impacts related to risks associated with hazards involving fault rupture are limited to operational impacts. No respective construction impacts would occur.

Operation

2040 GENERAL PLAN

The General Plan area does not contain Alquist Priolo Earthquake Fault Zones. The Serra Fault within the General Plan area is not identified as an Alquist-Priolo Fault Zone, because the Serra Fault surface fault trace has not been identified by the United Stated Geological Survey to have been a source of a Mercalli system 6+ earthquake during the Quaternary geologic period (past 1.6 million years).²³ The Serra Fault is not considered to be an active fault, defined as being a fault that has moved one or more times in the last 10,000 years.²⁴ Therefore, persons and property associated with development facilitated by the 2040 General Plan would not be directly or indirectly subject to effects involving rupture of a known earthquake fault.

²³ United States Geological Survey. 2022. Quaternary Faults. https://earthquake.usgs.gov/education/geologicmaps/qfaults.php (accessed May 2022).

²⁴ United States Geological Survey. 2022. Earthquake Hazards Program. https://www.usgs.gov/glossary/earthquake-hazards-program (accessed May 2022).

SPECIFIC PLAN

The Specific Plan area does not contain Alquist Priolo Earthquake Fault Zones. Therefore, persons and property associated with development facilitated by the Specific Plan area would not be directly or indirectly subject to effects involving rupture of a known earthquake fault.

Mitigation Measures

No mitigation is required.

Level of Significance

No impact

Effects of Seismic-related Hazards or Location on Unstable Geologic Unit

Significance Criterion a2, a3, &	a4: Would the proposed plans directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
	1. strong seismic ground shaking?
	2. seismic-related ground failure, including liquefaction?
	3. landslides?
Significance Criterion b:	Would the proposed plans be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Impact GEO-2 DEVELOPMENT FACILITATED BY THE PROPOSED PLANS COULD RESULT IN EXPOSURE OF PEOPLE OR STRUCTURES TO A RISK OF LOSS, INJURY, OR DEATH FROM SEISMIC EVENTS. DEVELOPMENT FACILITATED BY THE PROPOSED PLANS COULD BE LOCATED ON A GEOLOGIC UNIT OR SOIL THAT IS UNSTABLE OR COULD BECOME UNSTABLE RESULTING IN ON- OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE. HOWEVER, WITH COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

Impacts related to risks associated with seismic-related hazards and location on an unstable geologic unit or soil are limited to operational impacts. No respective construction impacts would occur.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Development facilitated by the 2040 General Plan and Specific Plan would result in additional residential, commercial, and retail development that would be potentially exposed to the effects of strong seismic ground shaking (as identified as Strong [VII Intensity or above] on the Mercalli Scale), seismic-related ground failure (liquefaction, lateral spreading, subsidence), and landslides resulting from local and regional earthquakes. Structures built in landslide zones would be exposed to an

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existing risk of landslide or, if improperly constructed, could exacerbate existing landslide conditions, especially construction on sites in the western portion of the city which is vulnerable to landslide hazard. New structures within the General Plan and Specific Plan areas could also experience substantial damage during seismic ground shaking events that are likely to occur in the future within the seismically active San Francisco Bay Area. The General Plan and Specific Plan areas are not located in a State designated earthquake induced landslide hazard zone, but there have been landslides on the steeper slopes throughout the western portion of Millbrae. Additionally, bay mud underlies the eastern portion of Millbrae near the San Francisco Bay and, thus, these areas could experience liquefaction, lateral spreading, or subsidence due to a seismic event.

Development within Millbrae would be required to be built to current seismic standards that could better withstand the adverse effects of strong ground shaking. Potential structural damage and the exposure of people to the risk of injury or death from structural failure would be minimized by compliance with CBC engineering design and construction measures. Foundations and other structural support features would be required to be designed to resist or absorb damaging forces from strong ground shaking and liquefaction. Under the proposed plans, increases in height of structures within the Specific Plan area could be allowed. The increase in allowable height could require foundations and other structural support features to be more robust to support the additional height; however, compliance with CBC regulations would ensure that the buildings would meet seismic safety standards. Additionally, all development would occur within the Specific Plan area where there are no slopes greater than 15 percent.

In addition to compliance with mandatory CBC requirements that address safe building development related to these hazards, the following 2040 General Plan goals and policies would further minimize potential adverse effects related to strong ground shaking, seismic-related ground failure, and landslides:

- **Policy HSHM-3.5 Earthquake Resiliency.** The City shall actively engage in planning methods and practices to address potential impacts from earthquakes.
- **Policy HSHM-3.7 Capital Improvements for Safety.** The City shall continue to give priority to capital improvement projects required to maintain an acceptable level of safety throughout the community and take measures to prevent damage to the City's infrastructure and emergency facilities resulting from natural hazards.
- **Policy HSHM-3.8 Resiliency Through Development and Design.** The City shall require appropriate setback and building elevation requirements for properties located along the Bayshore, lagoons, and in other low-lying areas that are susceptible to the effects of sea level rise to support resiliency through design.
- Goal HSHM-5 Protect life and minimize property damage from potential seismic hazards and landslides.
 - **Policy HSHM-5.1** Seismic Safety. The City shall continue to maintain and enforce appropriate standards to ensure existing and new development is located, designed, and constructed to minimize the risk of loss of life and property from seismic hazards.

- **Policy HSHM-5.3** Seismic Modifications to Residential Facilities. The City shall require that any residential use that is being increased by a specific threshold as defined in the Building Code shall conform to current Building Code seismic standards.
- **Policy HSHM-5.4** Geotechnical and Structural Analysis for Steep Slopes. Prior to construction of a new building or addition, the City shall require a geotechnical report for construction on slopes, unless it is demonstrated to Building Official by the licensed professional of the structural design that a geotechnical report is unnecessary.
- **Policy HSHM-5.5** Infrastructure and Utilities. The City shall require infrastructure and utility lines to be designed to withstand significant displacement in the event of a major earthquake in order to maintain and restore service.
- **Policy HSHM-5.8** Geotechnical Studies. The City shall require special geotechnical studies for new construction or additions in areas where there is a known earthquake fault zone or geotechnical hazard, such as the Serra Fault.
- **Policy HSHM-5.9 Bay Fill.** The City shall require new development on Bay fill to be protected against the effects of liquefaction and/or subsidence through proper building design and construction techniques.
- **Policy HSHM-5.10** Soil Stabilization. The City shall require projects in hillside areas that include land alteration or vegetation removal to prepare drainage and erosion control plans that show how the project will prevent soil erosion by retaining and replanting vegetation and siting development to minimize grading and landform alteration.
- **Policy HSHM-5.11 Slope Protection.** The City shall require property owners to provide slope protection by retaining and replanting vegetation on their property, and to maintain v-ditches and other private drainage systems. The City shall provide information regarding appropriate native, drought tolerant, and fire-resistant plant species.

Implementation of these 2040 General Plan goals and policies, in addition to compliance with applicable laws and regulations, would minimize the potential for loss, injury, or death related to strong ground shaking, seismic-related ground failure, and landslides caused by a seismic event within the General Plan and Specific Plan areas.

While impacts related to 2040 General Plan and Specific Plan potential to cause substantial adverse effects, including the risk of loss, injury, or death related to strong seismic ground shaking, seismic-related ground failure, or landslide, would be limited to development facilitated by the proposed plans, the 2040 General Plan would also require existing structures within Millbrae to be seismically upgraded pursuant to the following goals and policies:

Goal HSHM-5 Protect life and minimize property damage from potential seismic hazards and landslides.

Policy HSHM-5.2 Residential Seismic Upgrades. The City shall encourage owners of residential buildings with known structural defects such as unreinforced garage openings, "soft story" construction, unbolted foundations, and

inadequate sheer walls to take steps to remedy the problem by retrofitting buildings to meet current life-safety engineering standards.

- **Policy HSHM-5.6 Critical Facility Seismic Upgrade.** The City shall encourage seismic upgrades to critical public facilities, including hospitals and healthcare facilities, emergency shelters, police and fire stations, emergency communications facilities, and other important facilities that do not meet the most recent building code seismic standards. Where upgrades are not economically feasible, the City shall encourage the relocation and/or reconstruction of facilities.
- Policy HSHM-5.7 City Facility Seismic Upgrade. The City shall upgrade existing City facilities that do not meet the most recent existing building code seismic standards. Where upgrades are not economically feasible, the City shall consider the relocation and/or reconstruction of facilities.

As such, in addition to compliance with applicable laws and regulations and mandatory CBC requirements, existing development within the General Plan and Specific Plan areas would also be required to comply with applicable General Plan policies as listed above. Thus, overall, compliance with all aforementioned policies and requirements for both proposed and existing structures would minimize the potential for loss, injury, or death related to strong ground shaking, seismic-related ground failure, and landslides caused by a seismic event. Therefore, 2040 General Plan and Specific Plan operational impacts related to strong seismic ground shaking, seismic-related ground failure risk, and landslide hazard would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Soil Erosion or Topsoil Loss

Significance Criterion c: Would the proposed plans result in substantial soil erosion or the loss of topsoil?

Impact GEO-3 CONSTRUCTION FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD INCLUDE GROUND DISTURBANCE SUCH AS EXCAVATION AND GRADING THAT WOULD RESULT IN LOOSE OR EXPOSED SOIL. DISTURBED SOIL COULD BE ERODED BY WIND OR RAIN DURING A STORM EVENT, WHICH COULD RESULT IN THE LOSS OF TOPSOIL. ADHERENCE TO EXISTING REGULATORY REQUIREMENTS WOULD ENSURE THAT THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

Development facilitated by the 2040 General Plan and Specific Plan would involve construction activities such as stockpiling, grading, excavation, paving, and other earth-disturbing activities. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water.

Construction activities that disturb one or more acres of land surface are subject to NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) adopted by the SWRCB. Compliance with the permit requires each qualifying development project to file a Notice of Intent with the SWRCB. Permit conditions require preparation of a SWPPP, which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-storm water management controls. As described in Section 3.8, Hydrology and Water Quality, development within Millbrae would be required to comply with NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, otherwise known as the Construction General Permit (Order 2009-0009, as amended by Orders 2010-0014-DWQ and 2012-006-DWQ) which requires measures to reduce and eliminate stormwater pollutants, installation of appropriate BMPs to control stormwater runoff from construction sites, and that grading and drainage permits be obtained prior to construction. Grading and drainage plans accompanying the permit application must include BMPs for erosion prevention and sediment control, fencing at waterways and in sensitive areas, and limitation of disturbed areas through temporary features. The permit applications must also demonstrate compliance with NPDES Municipal Separate Storm Sewer System Permits (MS4) provisions. Enforcement of these permit requirements would reduce soil erosion impacts.

Additionally, Millbrae Municipal Code requirements for erosion prevention and sediment control would apply to construction facilitated by the proposed plans. These include erosion prevention and sediment control in accordance with Chapter 9.45 of the Millbrae Municipal Code, conformance of plans to erosion prevention and sediment control BMPs, grading restrictions during the winter rain period (October 15 through April 15), potential need for water sprinkling equipment on site during grading, and regulations of cut and fill slopes. Further, all development would occur within the Specific Plan area where there are no slopes greater than 15 percent. Adherence to the requirements of the Millbrae Municipal Code BMPs would reduce the potential for development facilitated by the project to cause erosion or the loss of topsoil by ensuring proper management of loose and disturbed soil. Therefore, 2040 General Plan and Specific Plan construction impacts related to soil erosion and loss of topsoil would be less than significant.

Operation

Impacts related to soil erosion or loss of topsoil are limited to construction impacts. No respective operational impacts would occur.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Effects of Location on Expansive Soil

Significance Criterion d: Would the proposed plans be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impact GEO-4 FUTURE SEISMIC EVENTS COULD RESULT IN LIQUEFACTION AND LATERAL SPREADING OF SOILS WITHIN THE CITY. DEVELOPMENT IN THE GENERAL PLAN AREA AND THE SPECIFIC PLAN AREA COULD BE SUBJECT TO LIQUEFACTION HAZARDS. COMPLIANCE WITH THE CBC WOULD REDUCE LIQUEFACTION HAZARDS. PROPOSED HEALTH, SAFETY, AND HAZMAT GOALS AND POLICIES APPLY TO DEVELOPMENT FACILITATED BY THE PROPOSED PLANS IN HAZARD ZONES FOR LIQUEFACTION OR LATERAL SPREADING OF SOILS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Impacts related to risks associated with location on expensive soil are limited to operational impacts. Construction of development facilitated by the 2040 General Plan and Specific Plan would comply with the CBC and applicable federal, State, and local regulations that would ensure construction activities (e.g., excavation of subterranean space) would not cause direct or indirect impacts to nearby properties in areas where expansive soils could potentially exist. No respective construction impacts would occur.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Development facilitated by the 2040 General Plan and Specific Plan on expansive soils, as defined by Table 1-B of the Uniform Building Code (1994), within the eastern portion of Millbrae, including along El Camino Real, could be subject to damage or could become unstable when the underlying soil shrinks or swells. The adverse effects of expansive soils can be avoided through proper subsoil preparation, drainage, and foundation design. In order to design an adequate foundation, it must be determined if the site contains expansive soils through appropriate soil sampling and laboratory soils testing. Expansive soils are identified through expansion tests of samples of soil or rock, or by means of the interpretation of Atterberg limit tests, a standard soils testing procedure. The CBC includes requirements to address soil-related hazards, including testing to identify expansive soils and design specifications where structures are to be constructed on expansive soils. Typical measures to treat expansive soil conditions involve removal, proper fill selection, and compaction. In cases where soil remediation is not feasible, the CBC requires structural reinforcement of foundations to resist the forces of expansive soils. Compliance with the requirements of the CBC, as well as relevant General Plan policies (including Goal HSHM-5, Policies HSHM-5.1, HSHM-5.3, HSHM-5.4, HSHM-5.5, HSHM-5.8, HSHM-5.9, HSHM-5.10, and HSHM-5.11 as discussed in detail under Impact GEO-2), would reduce risks related to expansive soils. Therefore, 2040 General Plan and Specific Plan operational impacts related to expansive soils would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Soils Incapable of Supporting Alternative Wastewater Disposal Systems

Significance Criterion e: Would the proposed plans have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Impact GEO-5 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD OCCUR ON URBANIZED SITES THAT ARE SERVED BY EXISTING SANITATION INFRASTRUCTURE. NEW DEVELOPMENT WOULD NOT INCLUDE SEPTIC SYSTEMS. THERE WOULD BE NO IMPACT.

Construction

Impacts related to the soil capability of supporting the use of alternative wastewater disposal systems are limited to operation. No construction impacts would occur.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Development facilitated by the 2040 General Plan and Specific Plan would occur in urbanized areas where existing wastewater infrastructure exists. The proposed plans would not include or require the use of septic tanks or alternative wastewater disposal systems. Therefore, no operational impacts would occur.

Mitigation Measures

No mitigation is required.

Level of Significance

No impact

Effects on Unique Paleontological Resources or Geologic Features

Significance Criterion f: Would the proposed plans directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact GEO-6 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN HAS THE POTENTIAL TO IMPACT PALEONTOLOGICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Consistent with SVP guidelines,¹⁵ the paleontological sensitivity of the geologic units underlying the General Plan and Specific Plan areas are described below based on review of published geologic maps, a literature review, and online fossil locality databases. The age and paleontological sensitivity of these geologic units are summarized in Table 3.5-2.

Table 3.5-2 Geologic Units in 2040 General Plan Area and Paleontological Sensitivity

Geologic Unit ¹	Age	Paleontological Sensitivity (SVP 2010)
Artificial fill (Qf1 and Qf2)*	Holocene	None
Bay Mud (Qm)	Holocene	Low

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Geologic Unit ¹	Age	Paleontological Sensitivity (SVP 2010)
Quaternary coarse-grained alluvium (Qc)*	Holocene	Low
Quaternary slope wash, ravine fill, and colluvium (Qsr)	Holocene	Low
Quaternary landslide deposits (Qyl)	Holocene	Low
Undivided sedimentary deposits (QTs)	Holocene to Pliocene	High
Colma Formation (Qc)*	Pleistocene	Low
Merced Formation (Tme)	Pliocene	High
Chert of Franciscan Complex (fc)	Cretaceous to Jurassic	Low
Greenstone of Franciscan Complex (fg)	Cretaceous to Jurassic	None
Metamorphic rock of Franciscan Complex (fm)	Cretaceous to Jurassic	None
Sandstone of Franciscan Complex (fs)	Cretaceous to Jurassic	Low
Sheared rock of Franciscan Complex (fsr)	Cretaceous to Jurassic	Low
¹ Source: Pampeyan (1994)		

* Geologic unit is also found in Specific Plan area

Abbreviation: SVP—Society of Vertebrate Paleontology

Construction

2040 GENERAL PLAN

Adverse effects to paleontological resources can only be determined once a specific project has been proposed because the effects are highly dependent on both the individual project site conditions and the characteristics of the proposed ground-disturbing activity. Ground disturbing activities associated with construction facilitated by the 2040 General Plan, particularly in areas that have not previously been developed with urban uses, have the potential to damage or destroy paleontological resources that may be present on or below the ground surface in areas of high paleontological sensitivity. Additionally, Holocene-aged sediments are underlain by older, higher sensitivity sediments at unknown depths in the subsurface. Therefore, future projects built in areas underlain by high-sensitivity or Holocene-aged geologic units (Table 3.5-2) would undergo CEQA review to assess their potential to impact paleontological resources. Implementation of Mitigation Measure GEO-1 would reduce 2040 General Plan construction impacts related to the destruction of paleontological resources or unique geological features to less than significant with mitigation.

SPECIFIC PLAN

Adverse effects to paleontological resources can only be determined once a specific project has been proposed because the effects are highly dependent on both the individual project site conditions and the characteristics of the proposed ground-disturbing activity. Ground disturbing activities associated with construction facilitated by the Specific Plan have the potential to damage or destroy paleontological resources that may be present at or below the ground surface. Much of the Specific Plan area is underlain by Holocene-aged sediments which are underlain by older, higher sensitivity sediments at unknown depths in the subsurface. Therefore, future projects built in areas underlain by Holocene-aged geologic units (Table 3.5-2) would undergo CEQA review to assess their potential to impact paleontological resources. Implementation of Mitigation Measure GEO-1 would reduce Specific Plan construction impacts related to the destruction of paleontological resources or unique geological features to less than significant with mitigation.

Operation

Impacts related to potential to cause substantial adverse change in the significance of a unique paleontological resource or unique geologic feature are limited to construction. No respective operational paleontological resources impacts would occur.

Mitigation Measures

MITIGATION MEASURE GEO-1 PROTECTION OF PALEONTOLOGICAL RESOURCES

The City of Millbrae shall add the following Policy to the Recreation, Arts, and Culture Element of the 2040 General Plan under Goal RAC-4:

Policy RAC-4.4 Protection of Paleontological Resources. The City shall require avoidance and/or mitigation for potential impacts to paleontological resources for any development that occurs within high sensitivity geologic units, whether they are mapped at the surface or occur at the subsurface. High sensitivity geology units include undivided sedimentary deposits and the Merced Formation. When paleontological resources are uncovered during site excavation, grading, or construction activities, work on the site will be suspended until the significance of the fossils can be determined by a qualified paleontologist. If significant resources are determined to exist, the paleontologist shall make recommendations for protection or recovery of the resource.

Significance Level

Less than significant with mitigation

Availability of a Mineral Resource or Recovery Site

Significance Criterion g:	Would the proposed plans result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?
Significance Criterion h:	Would the proposed plans result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Impact GEO-7 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD NOT HAVE THE POTENTIAL TO IMPACT MINERAL RESOURCES. THERE WOULD BE NO IMPACT.

Construction and Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

There are no significant mineral deposits or active mining operations within or in the vicinity of the General Plan area and Specific Plan area. In addition, implementation of the proposed plans would not affect a locally important mineral resource recovery site delineated by an applicable land use plan. Therefore, the proposed plans would not result in the loss of availability of a known mineral

resource or a locally important mineral resource recovery site during construction or operational activities. No construction or operational mineral resources impacts would occur.

Mitigation Measures

No mitigation is required.

Significance Level

No impact

3.5.5 Cumulative Impacts

The geographic scope of the cumulative geology/soils and mineral resources analysis is the General Plan and Specific Plan areas and the surrounding vicinity. Adverse effects associated with many geologies and soils tend to be localized; therefore, an area generally within a 0.25-mile radius would be the area most affected by activities in combination with the proposed plans. In addition, adverse effects associated with paleontological resource impacts tend to be localized, because the integrity of any given resource depends on what occurs only in the immediate vicinity around that resource, such as disruption of soils. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Impact Analysis*) located in Millbrae, Burlingame, South San Francisco, and at the San Francisco International Airport in addition to the proposed plans.

Seismic-related Hazards

Cumulative projects, including the proposed plans, have the potential to experience strong to violent ground shaking from earthquakes. Cumulative projects listed in Table 3-1 would be exposed to the same ground shaking hazards and likewise would be subject to the same requirements. All cumulative projects would adhere to the provisions of the California Building Code, and policies of the Millbrae 2040 General Plan and Millbrae Municipal Code and Burlingame and South San Francisco General Plans and Municipal Codes, reducing potential hazards associated with seismic ground shaking and ground failure. Therefore, the cumulative impact related to seismic-related hazards would be less than significant.

Soil-related Hazards

Soil conditions associated with the proposed plans, such as differential settlement, expansive soils, and soil creep, are specific to the plan area and generally do not contribute to a cumulative effect. Some or all other cumulative projects may have similar conditions, but they also would not contribute to a general geologic or soil cumulative effect. The proposed plans would be subject to all City of Millbrae 2040 General Plan policies, municipal code policies, and the CBC reducing soil-related hazard impacts. Other current and future development/redevelopment projects in the region would similarly be required to adhere to standards and practices that include stringent geologic and soil-related hazard mitigations. Therefore, the cumulative impact related to soil-related hazards would be less than significant.

Unique Geological Feature and Paleontological Resources

Construction activities associated with development of cumulative plans and projects in or within the vicinity of the plan areas may have the potential to encounter undiscovered geologic resources

and paleontological resources. Cumulative development would be required to mitigate for impacts through compliance with applicable federal and State laws governing geologic resources and paleontological resources. The likelihood that geologic resources and paleontological resources are present on the cumulative project sites is relatively low, given that the majority of soil disturbance associated with these projects will take place within Holocene soils too young to be fossiliferous. Although there is the possibility that previously undiscovered resources could be encountered by subsurface earthwork activities, the implementation of standard construction mitigation measures would ensure that undiscovered geologic and paleontological resources are not adversely affected by cumulative project-related construction activities, which would prevent the destruction or degradation of potentially significant paleontological resources in the vicinity of the plans' areas. Given the low potential for disruption and the comprehensiveness of mitigation measures that would apply to the cumulative projects in the vicinity, the proposed plans, in conjunction with cumulative plans and projects, would result in a less than significant with mitigation cumulative impact related to unique geologic and paleontological resources.

Mineral Resources

Since there is no plans'-level impact related to mineral resources, there would also be no cumulative impact related to mineral resources.

Overall Level of Cumulative Significance

Less than significant

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3.6 Greenhouse Gas Emissions and Energy

3.6.1 Introduction

This section describes existing greenhouse gas (GHG) emissions and sources Statewide, regionally, and within the City of Millbrae as well as the relevant regulatory framework. This section also analyzes possible impacts related to greenhouse gas (GHG) emissions and energy use from implementation of the 2040 General Plan and Specific Plan. Information included in this section is based on the Millbrae Climate Action Plan (CAP) and Millbrae CEQA GHG Checklist as well as vehicle miles traveled (VMT) data drawn from the Millbrae 2040 General Plan and Downtown and El Camino Real Specific Plan Transportation Impact Analysis (TIA), which is included as Appendix A to this EIR.

3.6.2 Environmental Setting

Greenhouse Gas Emissions

Greenhouse Effect, Global Warming, and Climate Change

Most of the energy that affects the Earth's climate comes from the sun. Some solar radiation is absorbed by the Earth's surface, and a smaller portion of this radiation is reflected by the atmosphere back toward space. As the Earth absorbs high frequency solar radiation, its surface gains heat and then re-radiates lower frequency infrared radiation back into the atmosphere.

Most solar radiation passes through gases in the atmosphere classified as GHGs; however, infrared radiation is selectively absorbed by GHGs. GHGs in the atmosphere play a critical role in maintaining the balance between the Earth's absorbed and radiated energy, the Earth's radiation budget, by trapping some of the infrared radiation emitted from the Earth's surface that otherwise would have escaped to space (see Figure 3.6-1). Radiative forcing is the difference between the incoming energy and outgoing energy. Specifically, GHGs affect the radiative forcing of the atmosphere, which in turn affects the Earth's average surface temperature. This phenomenon, the greenhouse effect, keeps the Earth's atmosphere near the surface warmer than it would be otherwise and allows successful habitation by humans and other forms of life.

Combustion of fossil fuels and deforestation release carbon into the atmosphere that historically has been stored underground in sediments or in surface vegetation, thereby exchanging carbon from the geosphere and biosphere to the atmosphere in the carbon cycle. With the accelerated increase in fossil fuel combustion and deforestation since the Industrial Revolution of the 19th century, concentrations of GHGs in the atmosphere have increased exponentially. Such emissions of GHGs in excess of natural ambient concentrations contribute to the enhancement of the natural greenhouse effect. This enhanced greenhouse effect has contributed to global warming, an increased rate of warming of the Earth's average surface temperature. Specifically, increases in GHGs lead to increased absorption of infrared radiation by the Earth's atmosphere and warm the lower atmosphere further, thereby increasing temperatures and evaporation rates near the surface.

Variations in natural phenomena such as volcanoes and solar activity produced most of the global temperature increase that occurred during preindustrial times. More recently, however, increasing atmospheric GHG concentrations resulting from human activity have been responsible for most of the observed global temperature increase.

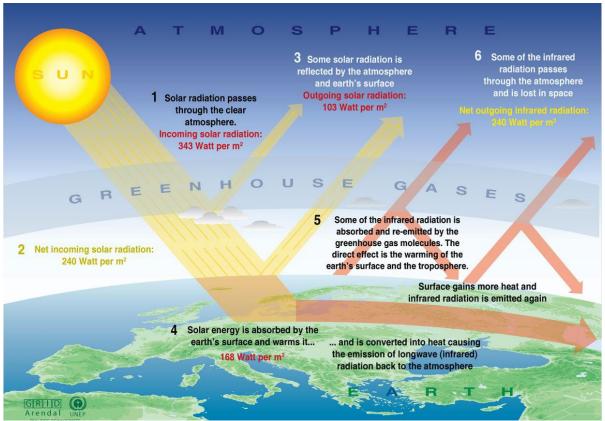


Figure 3.6-1 The Greenhouse Gas Effect

Source: United Nations Environmental Program/GRID-Arendal. 2005. Greenhouse Effect. https://www.grida.no/resources/6467>.

Warming affects global atmospheric circulation and temperatures; oceanic circulation and temperatures; wind and weather patterns; average sea level; ocean acidification; chemical reaction rates; precipitation rates, timing, and form; snowmelt timing and runoff flow; water supply; wildfire risks; and other phenomena, in ways collectively referred to as climate change. Climate change is the alteration in the average weather of the Earth that is measured by modifications in wind patterns, storms, precipitation, and temperature. These changes are assessed using historical records of temperature changes occurring in the past, such as during previous ice ages. Many of the concerns regarding climate change use this data to extrapolate a level of statistical significance specifically focusing on temperature records from the last 150 years (the Industrial Age) that differ from previous climate changes in rate and magnitude.

TEMPERATURE PREDICTIONS

The United Nations Intergovernmental Panel on Climate Change (IPCC) was established by the World Meteorological Organization and United Nations Environment Programme to assess scientific, technical, and socioeconomic information relevant to the understanding of climate change, its potential impacts, and options for adaptation and mitigation. The IPCC constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. In its Fourth Assessment Report, the IPCC predicted that the global mean temperature change from 1990 to 2100, given six scenarios, could range from 1.1 degrees Celsius (°C) to 6.4°C. Regardless of analytical methodology, global average temperatures and sea levels are expected to rise under all scenarios. The report also concluded that "[w]arming of the climate system is

unequivocal," and that "[m]ost of the observed increase in global average temperatures since the mid-20th century is very likely due to the observed increase in anthropogenic GHG concentrations." Warming of the climate system is now considered to be unequivocal, with the global surface temperature increasing about 1.33 degrees Fahrenheit (°F) over the last 100 years. The IPCC predicts increases in global average temperature of between 2°F and 11°F over the next 100 years.¹

GREENHOUSE GASES AND GLOBAL EMISSION SOURCES

Gases that trap heat in the atmosphere are referred to as GHGs. Prominent GHGs that naturally occur in the Earth's atmosphere are water vapor, carbon dioxide (CO₂), methane (CH₄), oxides of nitrogen (NO_X), and ozone. Anthropogenic (human-caused) GHG emissions include releases of these GHGs plus release of human-made gases with high global warming potential (GWP) (ozone-depleting substances such as chlorofluorocarbons [CFCs]) and aerosols, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). The GHGs listed by the IPCC (CO₂, CH₄, nitrous oxide (N₂O), HFCs, PFCs, and SF₆) are discussed below, in order of abundance in the atmosphere. Water vapor, despite being the most abundant GHG, is not discussed below, because natural concentrations and fluctuations far outweigh anthropogenic influences, making it impossible to predict. Ozone is not included, because it does not directly affect radiative forcing. Ozone-depleting substances (CFCs, halons, carbon tetrachloride, methyl chloroform, and hydrochlorofluorocarbons) are not included, because they have been replaced by HFCs and PFCs.

The global warming potential is the potential of a gas or aerosol to trap heat in the atmosphere and is essentially a measurement of the radiative forcing of a GHG compared with the reference gas, CO₂. Individual GHG compounds have varying potential for contributing to global warming. For example, CH₄ is 25 times as potent as CO₂, while SF₆ is 22,200 times more potent than CO₂ on a molecule-per-molecule basis. To simplify reporting and analysis, methods have been set forth to describe emissions of GHGs in terms of a single gas. The most commonly accepted method for comparing GHG emissions is the GWP methodology defined in the IPCC reference documents.² The IPCC defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of carbon dioxide equivalents (CO_2e), which compares the gas in question to that of the same mass of CO2 (by definition, CO_2 has a GWP of 1). The global warming potential of a GHG is a measure of how much a given mass of a GHG is estimated to contribute to global warming. Thus, to describe how much global warming a given type and amount of GHG may cause, the CO₂e is used. A CO_2e is the mass emissions of an individual GHG multiplied by its global warming potential. As such, a high GWP represents high absorption of infrared radiation and a long atmospheric lifetime compared to CO₂. One must also select a time horizon to convert GHG emissions to equivalent CO₂ emissions to account for chemical reactivity and lifetime differences among various GHG species. The standard time horizon for climate change analysis is 100 years. Generally, GHG emissions are quantified in terms of metric tons (MT) CO₂e emitted per year.

The atmospheric residence time of a gas is equal to the total atmospheric abundance of the gas divided by its rate of removal (Seinfeld 2006). The atmospheric residence time of a gas is, in effect, a half-life measurement of the length of time a gas is expected to persist in the atmosphere when accounting for removal mechanisms such as chemical transformation and deposition. Table 3.6-1 lists the GWP of each GHG and its lifetime. Units commonly used to describe the concentration of GHGs in the atmosphere are parts per million (ppm), parts per billion (ppb), and parts per trillion

¹ Intergovernmental Panel on Climate Change (IPCC). 2007. AR4 Climate Change 2007: The Physical Science Basis.

<https://www.ipcc.ch/report/ar4/wg1/>.

² IPCC. 2014. Frequently Asked Questions. https://www.ipcc-nggip.iges.or.jp/faq/FAQ.pdf>.

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(ppt), referring to the number of molecules of the GHG in a sampling of 1 million, 1 billion, or 1 trillion molecules of air. Collectively, HFCs, PFCs, and SF_6 are referred to as high-GWP gases. CO₂ is by far the largest component of worldwide CO₂e emissions, followed by CH₄, N₂O, and high-GWP gases, in order of decreasing contribution to CO₂e.

The primary human processes that release GHGs include the burning of fossil fuels for transportation, heating, and electricity generation; agricultural practices that release CH₄, such as livestock grazing and crop residue decomposition; and industrial processes that release smaller amounts of high-GWP gases. Deforestation and land cover conversion have also been identified as contributing to global warming by reducing the Earth's capacity to remove CO₂ from the air and altering the Earth's albedo or surface reflectance, thus allowing more solar radiation to be absorbed. Specifically, CO₂ emissions associated with fossil fuel combustion are the primary contributors to human-induced climate change. CO₂, CH₄, and N₂O emissions associated with human activities are the next largest contributors to climate change. GHGs of California concern are defined by California Assembly Bill (AB) 32 (see the Regulatory Environment subsection below for a description) and include CO₂, CH₄, NOX, HFCs, PFCs, and SF₆. A seventh GHG, nitrogen trifluoride (NF₃), was also added under the California Health and Safety Code Section 38505(g)(7) as a GHG of concern. These GHGs are described in terms of their physical description and properties, global warming potential, atmospheric residence lifetime, sources, and atmospheric concentration in 2005 in Table 3.6-1.

Global Climate Change

EXTENT

Climate change is a global problem, because GHGs are global pollutants, unlike criteria air pollutants and hazardous air pollutants (i.e., toxic air contaminants) that are pollutants of regional and local concern. Pollutants with localized air quality effects have relatively short atmospheric lifetimes, approximately 1 day; by contrast, GHGs have long atmospheric lifetimes, several years to several thousand years. GHGs persist in the atmosphere for enough time to be dispersed around the globe.

Although the exact lifetime of particular GHG molecules depends on multiple variables and cannot be pinpointed, more CO₂ is currently emitted into the atmosphere than is sequestered. CO₂ sinks, or reservoirs, include vegetation and the ocean, which absorb CO₂ through photosynthesis and dissolution, respectively. These are two of the most common processes of CO₂ sequestration. Of the total annual human-caused CO₂ emissions, approximately 54 percent is sequestered through ocean uptake, Northern Hemisphere forest regrowth, and other terrestrial sinks within a year, whereas the remaining 46 percent of human-caused CO₂ emissions is stored in the atmosphere (Seinfeld 2006).

Similarly, effects of GHGs are borne globally, as opposed to the localized air quality effects of criteria air pollutants and hazardous air pollutants. The quantity of GHGs that it takes to ultimately result in climate change is not precisely known and cannot be quantified, and no single plan or project would be expected to measurably contribute to a noticeable incremental change in the global average temperature, or to global or local climates or microclimate. However, emissions of GHGs have the potential to adversely affect the environment, because such emissions contribute, on a cumulative basis, to global climate change.

Greenhouse Gas	Physical Description and Properties	Global Warming Potential (100 years)	Atmospheric Residence Lifetime (years)	Sources
Carbon dioxide (CO ₂)	Odorless, colorless, natural gas.	1	50–200	Burning coal, oil, natural gas, and wood; decompositior of dead organic matter; respiration of bacteria, plants, animals, and fungus; oceanic evaporation; volcanic outgassing; cement production; land use changes.
Methane (CH₄)	Flammable gas and is the main component of natural gas.	25	12	Geological deposits (natural gas fields) extraction; landfills; fermentation of manure; and decay of organic matter.
Nitrous oxide (N ₂ O)	N_2O (laughing gas) is a colorless GHG.	298	114	Microbial processes in soil and water; fuel combustion; industrial processes.
Chloro-fluoro-carbons (CFCs)	Nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (level of air at the Earth's surface); formed synthetically by replacing all hydrogen atoms in CH ₄ or ethane with chlorine and/or fluorine atoms.	3,800–8,100	45–640	Refrigerants aerosol propellants; cleaning solvents.
Hydro-fluoro-carbons (HFCs)	Synthetic human-made chemicals used as a substitute for CFCs and contain carbon, chlorine, and at least one hydrogen atom.	140-11,700	1–50,000	Automobile air conditioners; refrigerants.
Per- fluoro-carbons (PFCs)	Stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface.	6,500-9,200	0,000–50,000	Primary aluminum production; semiconductor manufacturing.
Sulfur hexafluoride (SF ₆)	Human-made, inorganic, odorless, colorless, and nontoxic, nonflammable gas.	22,800	3,200	Electrical power transmission equipment insulation; magnesium industry, semiconductor manufacturing; a tracer gas.
Nitrogen trifluoride (NF₃)	Inorganic, is used as a replacement for PFCs, and is a powerful oxidizing agent.	17,200	740	Electronics manufacture for semiconductors and liquid crystal displays.

Table 3.6-1 Description of Greenhouse Gases of California Concern

IPCC. 2007. AR4 Climate Change 2007: The Physical Science Basis. https://www.ipcc.ch/report/ar4/wg1/.

IPCC 2007. AR4 Climate Change 2007: Synthesis Report. https://www.ipcc.ch/report/ar4/syr/.

TRENDS AND EFFECTS

Globally, climate change has the potential to affect numerous environmental resources through potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than was observed during the 20th century. Long-term trends found that each of the past four decades was warmer than all the previous decades in the instrumental record. The observed global mean surface temperature for the decade from 2006 to 2015 was 0.87°C higher than the global mean surface temperature over the period from 1850 to 1900. Several independently analyzed data records of global and regional Land-Surface Air Temperature obtained from station observations agree that Land-Surface Air Temperature and sea surface temperatures have increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades.^{3,4}

According to California's Fourth Climate Change Assessment, Statewide temperatures from 1986 to 2016 were approximately 1°F to 2°F higher than those recorded from 1901 to 1960. Potential impacts of climate change in California may include loss in water supply from snowpack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years. While there is growing scientific consensus about the possible effects of climate change at a global and Statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy.⁵

In California, climate change may result in consequences such as the following:

- A reduction in the quality and supply of water from the Sierra snowpack. If heat-trapping emissions continue unabated, more precipitation will fall as rain instead of snow, and the snow that does fall will melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90 percent. This can lead to challenges in securing adequate water supplies. It can also lead to a potential reduction in hydropower.
- Increased risk of large wildfires. If rain increases as temperatures rise, wildfires in the forests, grasslands and chaparral ecosystems of Southern California are estimated to increase by approximately 30 percent toward the end of the 21st century because more winter rain will stimulate the growth of more plant "fuel" available to burn in the fall. In contrast, a hotter, drier climate could promote up to 90 percent more northern California fires by the end of the century by drying out and increasing the flammability of forest vegetation.
- Reductions in the quality and quantity of certain agricultural products. The crops and products likely to be adversely affected include wine grapes, fruit, nuts, and milk.
- Exacerbation of air quality problems. If temperatures rise to the medium warming range, there could be 75 to 85 percent more days with weather conducive to ozone formation in Los Angeles and the San Joaquin Valley, relative to today's conditions. This is more than twice the increase expected if rising temperatures remain in the lower warming range. This increase in air quality problems could result in an increase in asthma and other health-related problems.

³ IPCC. 2014. Summary for Policymakers. In: AR5 Climate Change 2014, Mitigation of Climate Change. ">https://www.ipcc.ch/report/ar5/wg3/>.

⁴ IPCC. 2018. Summary for Policymakers. In: Global warming of 1.5°C. An IPCC Special Report. . https://www.ipcc.ch/sr15/>.

⁵ California, State of. 2018. California's Fourth Climate Change Assessment Statewide Summary Report. http://www.climateassessment.ca.gov/state/>.

- A rise in sea levels resulting in the displacement of coastal businesses and residences. During the past century, sea levels along California's coast have risen about seven inches. If emissions continue unabated and temperatures rise into the higher anticipated warming range, sea level is expected to rise an additional 22 to 35 inches by the end of the century. Elevations of this magnitude would inundate coastal areas with salt water, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats.
- An increase temperature and extreme weather events. Climate change is expected to lead to increases in the frequency, intensity, and duration of extreme heat events and heat waves in California. More heat waves can exacerbate chronic disease or heat-related illness.
- A decrease in the health and productivity of California's forests. Climate change can cause an increase in wildfires, an enhanced nuisance insect population, and establishment of non-native species.
- Damage to marine ecosystems and natural environment. Climate change can cause damage to marine ecosystems, including acidification of the oceans due to increased CO₂ levels (including coral bleaching).

Existing GHG Emissions

GLOBAL

Worldwide anthropogenic emissions of GHG were approximately 46,000 MMT, or gigatonne of CO_2e in 2010. CO_2 emissions from fossil fuel combustion and industrial processes contributed about 65 percent of total emissions in 2010. Of anthropogenic GHGs, CO_2 was the most abundant accounting for 76 percent of total 2010 emissions. CH_4 emissions accounted for 16 percent of the 2010 total, while N₂O and fluorinated gases account for six and two percent, respectively.⁶

UNITED STATES

Total U.S. GHG emissions were 6,676.6 MMTCO₂e in 2018. Total U.S. emissions increased by 3.7 percent from 1990 to 2018. Overall, net emissions increased by 3.1 percent from 2017 to 2018 and decreased by 10.2 percent from 2005 to 2018. The decrease from 2005 to 2018 reflects long-term trends, including energy market trends, technological changes including energy efficiency, and energy fuel choices. Between 2017 and 2018, the increase in emissions was driven by an increase in CO_2 emissions from fossil fuel combustion, which was a result of increased energy use from greater heating and cooling needs due to a colder winter and hotter summer in 2018 compared to 2017. In 2018, the largest source of CO_2 and of overall emissions, was fossil fuel combustion, representing approximately 81.3 percent of U.S. GHG emissions (see Figure 3.6-2). CH₄ accounted for nearly 10 percent, N₂O accounted for approximately 6.5 percent, and the remaining 2.7 percent of U.S. GHG emissions were HFCs, PFCs, SF₆, and NF₃.⁷

⁶ IPCC. 2014. Summary for Policymakers. In: AR5 Climate Change 2014, Mitigation of Climate Change. ">https://www.ipcc.ch/report/ar5/wg3/>.

⁷ United States Environmental Protection Agency (US EPA). 2018. Emission Factors for Greenhouse Gas Inventories. https://www.epa.gov/sites/production/files/2018-03/documents/emission-factors_mar_2018_0.pdf.

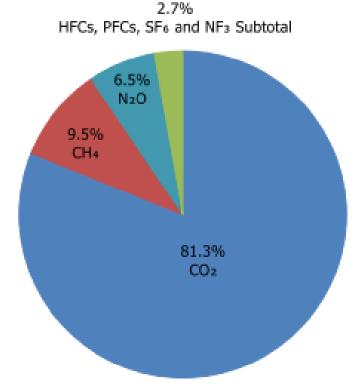


Figure 3.6-2 2018 U.S. GHG Emissions by Gas

Source: US EPA 2020. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2018.

CALIFORNIA

According to the California Air Resources Board (CARB), total California GHG emissions were 425 MMTCO₂e in 2018.⁸ The major source of GHGs in California is associated with transportation, contributing nearly 40 percent of Statewide GHG emissions in 2018. The industrial sector is the second largest source, contributing 21 percent of Statewide GHG emissions, and the electricity sector accounted for approximately 15 percent (see Figure 3.6-3).

⁸ CARB. 2020. California GHG Emissions for 2000 to 2018: Trends of Emissions and Other Indicators. https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2018/ghg_inventory_trends_00-18.pdf>.

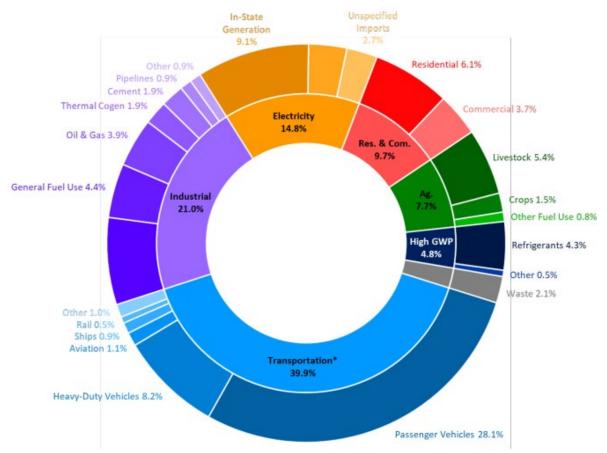


Figure 3.6-3 2018 California GHG Emissions by Scoping Plan Sectors and Sub-Sectors

Note: This figure breaks out 2018 California emissions by sector into an additional level of sub-sector categories. The inner ring shows the broad CARB Climate Change Scoping Plan sectors. The outer ring breaks out the sectors into sub-sectors or emission categories. The transportation sector represents tailpipe emissions from on-road vehicles and direct emissions from other off-road mobile sources; it does not include emissions from petroleum refineries and oil extraction and production, which are included in the industrial sector. Source: CARB. 2020. California GHG Emissions for 2000 to 2018: Trends of Emissions and Other Indicators. https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2018/ghg_inventory_trends_00-18.pdf>.

MILLBRAE (GENERAL PLAN AREA)

In 2005, approximately 150,643 metric tons of carbon dioxide equivalent (MT CO₂e) were emitted in Millbrae from the residential, commercial, industrial, transportation, waste, and municipal sectors. The residential, commercial, and industrial sectors represent emissions that result from electricity and natural gas used in both private and public sector buildings and facilities. The transportation sector includes emissions from private, commercial, and fleet vehicles driven within the City as well as the emissions from transit vehicles, the City-owned fleet, and off-road equipment such as lawnmowers/ garden equipment and construction, industrial, and light commercial equipment. For the communitywide inventory, the municipal emissions are included in the commercial/industrial sector. Burning fossil fuels associated with vehicle use and buildings/facility energy use is the largest contributor of Millbrae GHG emissions. Table 3.6-6 includes total Millbrae (i.e., community and municipal) GHG emissions in 2005 by sector as well as percentage of total City emissions.

Sector	(MT of CO2e)	Percentage of GHG Emissions
Residential	32,405	21.5
Commercial/Industrial	27,633	18.3
Transportation – Local roads	29,558	19.6
Transportation – State highways	51,981	34.5
Transportation – Off-road equipment	5,645	3.7
Transportation Caltrain	873	0.6
Generated Waste	2,486	1.7
Wastewater Treatment	62	0.04
Total	150,643	100

Table 3.6-2 Millbrae 2005 Communitywide GHG Emissions by Sector

Energy

Energy Fundamentals

Energy is generally transmitted either in the form of electricity, measured in kilowatts (kW) or megawatts (MW), or natural gas measured in British thermal units (BTU), cubic feet, or therms. Fuel, such as gasoline or diesel, is measured in gallons or liters.

ELECTRICITY

Electricity is used primarily for lighting, appliances, cooking purpose, HVAC equipment, and other uses associated with building and vehicle operations. Electricity sources range from renewable (hydroelectric, solar, wind, geothermal, biomass) to nonrenewable (natural gas, oil, nuclear, coal).

NATURAL GAS

Natural gas is used primarily for heating, water heating, and cooking purpose and is typically associated with building operations.

FUEL

Fuel is used primarily for powering off-road equipment and vehicles (commercial trucks and other vehicles). The typical fuel types used are diesel and gasoline.

Electricity Generation, Distribution and Storage

CALIFORNIA

According to the California Energy Commission (CEC), California generated approximately 285,448 gigawatt-hours (GWh) of electricity in 2018. As shown in Table 3.6-3, approximately 35 percent of this electricity was sourced from natural gas, 31 percent from renewable sources, 11 percent from large hydroelectric sources, and the remaining 23 percent was sourced from coal, nuclear, oil, other and unspecified sources. Specifically, the 31 percent of California's 2018 retail electric sales that

were served by renewable resources included sources from wind, solar, geothermal, biomass, and small hydroelectric.⁹

Fuel Type	In-State Generation (GWh)	Percent of In-State Generation	Northwest Imports (GWh)	Southwest Imports (GWh)	State Energy Mix (GWh)	State Power Mix
Coal	294	0.15%	399	8,740	9,433	3.30%
Large Hydro	22,096	11.34%	7,418	985	30,499	10.68%
Natural Gas	90,691	46.54%	49	8,904	99,644	34.91%
Nuclear	18,268	9.38%	0	7,573	25,841	9.05%
Oil	35	0.02%	0	0	35	0.01%
Other (Petroleum/ Waste Heat)	430	0.22%	0	9	439	0.15%
Renewables	63,028	32.35%	14,074	12,400	89,502	31.36%
Biomass	5,909	3.03%	772	26	6,707	2.35%
Geothermal	11,528	5.92%	171	1,269	12,968	4.54%
Small Hydro	4,248	2.18%	334	1	4,583	1.61%
Solar	27,265	13.99%	174	5,094	32,533	11.40%
Wind	14,078	7.23%	12,623	6,010	32,711	11.46%
Unspecified	N/A	N/A	17,576	12,519	30,095	10.54%
Total	194,842	100.00%	39,516	51,130	285,488	100.00%

Table 3.6-3 California 2018 Total System Electric Generation

GWh = gigawatt-hours

Source: CEC 2019. California 2018 Total System Electric Generation. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2019-total-system-electric-generation/2018.

Electricity is distributed through the various electric load-serving entities (LSEs) in California. These entities include investor-owned utilities, publicly owned LSEs, rural electric cooperatives, community choice aggregators, and electric service providers.¹⁰

SAN MATEO COUNTY AND MILLBRAE

San Mateo County as a whole consumed approximately 4,325 GWh of electricity in 2019 from residential and non-residential uses.¹¹ Two electricity providers serve the City of Millbrae: Peninsula Clean Energy (PCE) and Pacific Gas and Electric Company (PG&E). PCE provides clean energy that is 100 percent carbon free, either sourced entirely from renewable energy (50 percent solar and 50 percent wind) or 52.2 percent renewable (including biomass & waste, geothermal, small hydroelectric, solar, and wind). PCE aims to provide only 100 percent renewable by 2025.¹² PG&E's default power mix offers 29 percent renewable, and they offer customers options for 64 percent or

⁹ CEC. 2019. California 2018 Total System Electric Generation. https://www.energy.ca.gov/data-reports/energy-almanac/californiaelectricity-data/2019-total-system-electric-generation/2018.

¹⁰ CEC. 2021. Electric Load-Serving Entities (LSEs) in California. https://www.energy.ca.gov/almanac/electricity_data/utilities.html.

¹¹ CEC. 2021. Electricity Consumption by County. http://www.ecdms.energy.ca.gov/elecbycounty.aspx (accessed April 2022).

¹² Peninsula Clean Energy (PCE). 2022. Power Mix. https://www.peninsulacleanenergy.com/power-mix/ (accessed April 2022).

100 percent renewable power mixes.¹³ In conjunction with the utility companies, the California Public Utilities Commission (CPUC) is involved in energy conservation programs.

Natural Gas Distribution

CALIFORNIA

According to the CPUC, natural gas from out-of-state production basins is delivered into California via the interstate natural gas pipeline system. The major interstate pipelines that deliver out-of-state natural gas to California gas utilities are Gas Transmission Northwest Pipeline, Kern River Pipeline, Transwestern Pipeline, El Paso Pipeline, Ruby Pipeline, Mojave Pipeline, and Tuscarora.¹⁴ Because natural gas is a dispatchable energy resource that provides load when the availability of hydroelectric power generation and/or other energy sources decrease, distribution varies greatly from year to year. The availability and distribution of hydroelectric-sourced energy, increasing renewable-source energy, and overall consumer demand are the variables that shape the need for natural gas.

SAN MATEO COUNTY AND MILLBRAE

San Mateo County as a whole consumed approximately 214 million therms of natural gas in 2019 in both residential and non-residential uses.¹⁵ PG&E is the natural gas provider for the City. The nearest PG&E gas transportation pipelines run along Highway 101 (Bayshore Freeway) to the northeast of the city and along Highway 280 to the southwest of the city. There are 61 distribution gas pipelines located throughout Millbrae.

Fuel Distribution

CALIFORNIA

According to the 2015 CEC market share data, California consists of distributors of gasoline, which include companies or individuals who make the first distribution of gasoline in California. Aircraft manufacturers and certificated or licensed carriers by air may be included within the definition of distributor. Distributors can also be "Brokers," which includes every person, other than a distributor or a retailer, who deals in lots of 200 or more gallons of gasoline.¹⁶

Based on the California Transportation of Petroleum Second Northern California Refinery Safety Forum, output from the refineries is usually placed in intermediate tanks before blending finished products. Most gasoline is shipped from refinery by pipeline, which serves over 60 distribution terminals, which is then transported to retail and nonretail stations by tanker trucks.¹⁷

¹³ PG&E. 2019. Where your electricity comes from. https://www.pge.com/pge_global/common/pdfs/your-account/your-bill/understandyour-bill/bill-inserts/2020/1220-PowerContent-ADA.pdf (accessed April 2019).

¹⁴ CPUC. 2021. Natural Gas and California.

https://www.cpuc.ca.gov/natural_gas/#:~:text=Natural%20gas%20from%20out%2Dof,interstate%20natural%20gas%20pipeline%20syste m.&text=The%20state's%20natural%20gas%20utilities%20operate%20over%20100%2C000%20miles%20of,more%20miles%20of%20servi ce%20line.

¹⁵ CEC. 2021. Gas Consumption by County. http://www.ecdms.energy.ca.gov/gasbycounty.aspx (accessed April 2022).

¹⁶ CEC. 2015. Gasoline Market Share in California for 2014.

https://ww2.energy.ca.gov/almanac/transportation_data/gasoline/market_share/.

¹⁷ Schremp. 2015. California Transportation of Petroleum: Second Northern California Refinery Safety Forum. https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/Refinery-Documents-2015yr-Petroleum.pdf.

MILLBRAE

There are nine gasoline and diesel fueling stations with Millbrae.

Available Alternative Vehicle Fuels

Various Statewide regulations and plans encourage alternative fuel use to reduce GHG emissions and criteria pollutant emissions. These include the Low Carbon Fuel Standard and SB 32, as well as myriad other Statewide and local air district regulations. Conventional gasoline and diesel may be replaced with different alternative fuels, depending on the capability of the vehicle. Descriptions of the most widely used alternative fuels include the following:

- Electricity can power electric and plug-in hybrid electric vehicles directly from the power grid. Generally, these vehicles draw from the electricity grid and store the energy in their batteries. Millbrae has 13 electric vehicle charging stations throughout the City (U.S. Department of Energy.¹⁸
- Biodiesel is a renewable alternative fuel that can be manufactured from vegetable oils, animal fats, or recycled restaurant grease. Biodiesel is biodegradable and cleaner-burning than petroleum-based diesel fuel. Generally, biodiesel can run in any diesel engine without alterations, but fueling stations have been slow to make it available. There are eleven biodiesel refueling stations in California, but none in the City of Millbrae. According to the USDOE, the closest biodiesel station to Millbrae is in the City of San Francisco.¹⁹
- Compressed natural gas (CNG) and liquefied natural gas (LNG) is currently being used in vehicles. CNG is used in light-, medium-, and heavy-duty vehicles and gets about the same fuel economy. LNG is costly to produce and therefore is used in limited applications, typically in medium- and heavy-duty vehicles. There is one CNG station and no LNG stations within Millbrae.²⁰ The nearest LNG station is in the City of Lathrop.²¹
- Hydrogen is being explored for use in combustion engines and fuel cell electric vehicles. The interest in hydrogen as an alternative transportation fuel stems from its clean-burning qualities, its potential for domestic production, and the fuel cell vehicle's potential for high efficiency: hydrogen is two to three times more efficient than gasoline. The closest station to Millbrae is in the City of South San Francisco.²² Fuel cells are being explored as a way to use electricity generated on-board the vehicle to power electric motors. Millbrae does not have any hydrogen stations.

Existing Energy Use

CALIFORNIA

According to the U.S. Energy Information Administration (USEIA), total electricity direct consumption within California in 2018 was 12,859.245 GWh, up 0.5 percent, or 64.385 GWh, from

¹⁸ USDE. 2022. https://afdc.energy.gov/fuels/electricity_locations.html#/find/nearest?fuel=ELEC&location=millbrae

¹⁹ USDE. 2022. https://afdc.energy.gov/fuels/electricity_locations.html#/find/nearest?fuel=BD&location=millbrae

²⁰ USDE. 2022. https://afdc.energy.gov/fuels/electricity_locations.html#/find/nearest?fuel=CNG&location=millbrae

²¹ USDE. 2022. https://afdc.energy.gov/fuels/electricity_locations.html#/find/nearest?fuel=LNG&location=millbrae

²² USDE. 2022. https://afdc.energy.gov/fuels/electricity_locations.html#/find/nearest?fuel=HY&location=millbrae

2017. California electricity consumption in 2018 represented approximately 9 percent of total U.S. electricity consumption in 2018.²³

In 2018, total California natural gas demand for industrial, residential, commercial, and electric power generation was 2,137,920 million cubic feet per year (MCF/year).

The main category of fuel use in California is transportation fuel, specifically gasoline and diesel. Gasoline is the most used transportation fuel in California: 97 percent of all gasoline sold in California is consumed by light-duty cars, pickup trucks, and sport utility vehicles. In 2018, an estimated 143,080 million gallons of gasoline annually were used (i.e., 392 million gallons gasoline per day), marking a record level of consumption between 1997 and 2020.²⁴ Diesel is the second largest transportation fuel used in California. Many heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm, construction, and heavy-duty military vehicles and equipment have diesel engines. According to the 2019 California Annual Retail Fuel Outlet Report Results (CEC-A15), in 2018, 1,752 million gallons of diesel annually (i.e., 4.8 million gallons of diesel per day), including off-road diesel, was sold.²⁵

MILLBRAE (GENERAL PLAN AREA)

In 2005, Millbrae's total stationary energy consumption was 97,600,567 kilowatt-hours (kWh) of electricity and 8,251,321 therms of natural gas.²⁶

As shown in Table 3.6-4, approximately 251 million gallons of transportation fuel were consumed in San Mateo County in 2020, of which approximately 238 million gallons were gasoline and approximately 13 million gallons were diesel fuel.²⁷ This equates to approximately 0.69 million gallons of fuel per day or 0.8 gallons of fuel per person per day, based on a 2021 countywide population of 765,245 people.²⁸

The City of Millbrae consumed approximately eight million gallons of gasoline in 2020.²⁹ This equates to approximately 0.02 million gallons of fuel per day or 0.89 gallons of fuel per person per day, based on a 2021 countywide population of 22,509 people.³⁰

According to the CEC, one gallon of gasoline is equivalent to approximately 109,786 Btu, while one gallon of diesel is equivalent to approximately 127,460 Btu.³¹ Based on this formula, approximately 156 billion Btu in transportation fuel were consumed per day in 2020 in San Mateo County, while 2.4 billion Btu in gasoline was consumed per day in 2020 in the City (see Table 3.6-4).

²³ U.S. Energy Information Administration (USEIA). 2020. California Electricity Profile2018. https://www.eia.gov/electricity/state/archive/2018/california/.

²⁴ CEC. 2021. California Gasoline, Data, Facts, and Statistics. https://www.energy.ca.gov/data-reports/energy-almanac/transportationenergy/california-gasoline-data-facts-and-statistics.

 ²⁵ CEC. 2021. 2010-2019 CEC-A15 Results and Analysis – Diesel Sales by County. https://www.energy.ca.gov/media/3874.
 ²⁶ Millbrae, City of. 2020. Millbrae Climate Action Plan.

²⁷ CEC. 2021. California Retail Fuel Outlet Annual Reporting (CEC-A15) Results. https://www.energy.ca.gov/data-reports/energyalmanac/transportation-energy/california-retail-fuel-outlet-annual-reporting (accessed April 2022).

²⁸ California Department of Finance (CDF). 2021. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with 2010 Census Benchmark. https://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/ (accessed April 2022).

²⁹ CEC. 2021. 2010-2019 CEC-A15 Results and Analysis – Diesel Sales by County. https://www.energy.ca.gov/media/3874.

³⁰ CDF. 2021. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2021 with 2010 Census Benchmark. https://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/ (accessed April 2022).

³¹ Schremp, Gordon. 2017. Senior Fuels Specialist, California Energy Commission. Personal communication via phone and email regarding fuel consumption in California by County and by source with Lance Park, Associate Planner, Rincon Consultants, Inc. August 22, 2017.

Fuel Type	2020 Annual Fuel Use (million gallons)	2020 Daily Fuel Use (million gallons)	2020 Daily Energy Use (billions of Btu)	2020 Daily per Capita Energy Use (thousands of Btu)
Gasoline (County)	238	0.65	71.6	93.5
Diesel (County)	13	0.04	4.5	5.9
Total (County)	251	0.69	76.1	99.4
Gasoline (City)	8.0	.02	2.4	106.9

 Table 3.6-4
 Transportation Energy Consumption in San Mateo County and Millbrae

Source: CEC 2021c

3.6.3 Regulatory Framework

Additional regulatory information related to GHG emissions and energy efficiency standards are included throughout the other resource sections including Section 3.13, *Utilities and Service Systems*, which includes discussion of water use efficiency standards, solid waste standards, and wastewater standards, and Section 3.2, *Air Quality*, which includes discussion of air quality related regulations.

Federal Regulations

Clean Air Act (Regulation of GHGs)

The United States Environmental Protection Agency (US EPA) issued an Endangerment Finding under Section 202(a) of the Clean Air Act, opening the door to federal regulation of GHGs. The Endangerment Finding notes that GHGs threaten public health and welfare and are subject to regulation under the Clean Air Act. To date, the US EPA has not promulgated regulations on GHG emissions, but it has already begun to develop them.

Federal Fuel Efficiency Standards (CAFE)

Under the Clean Air Act, corporate average fuel economy (CAFE) standards have been set for passenger cars and light trucks. The State of California has traditionally had a waiver to set its own more stringent fuel efficiency standards. However, on August 2, 2018, the NHTSA and US EPA, operating under the direction of the Trump Administration, proposed the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE Rule). This rule addresses emissions and fuel economy standards for motor vehicles and is separated in two parts as described below.

- Part One, "One National Program" (84 FR 51310) revokes a waiver granted by US EPA to the State of California under Section 209 of the CAA to enforce more stringent emission standards for motor vehicles than those required by US EPA for the explicit purpose of GHG reduction, and indirectly, criteria air pollutants and ozone precursor emission reduction. This revocation became effective on November 26, 2019, potentially restricting the ability of CARB to enforce more stringent GHG emission standards for new vehicles and set zero emission vehicle mandates in California.
- Part Two addresses CAFE standards for passenger cars and light trucks for model years 2021 to 2026. This rulemaking proposes new CAFE standards for model years 2022 through 2026 and would amend existing CAFE standards for model year 2021. The proposal would retain the model year 2020 standards (specifically, the footprint target curves for passenger cars and light

trucks) through model year 2026. The proposal addressing CAFE standards was jointly developed by NHTSA and US EPA, with US EPA simultaneously proposing tailpipe CO₂ standards for the same vehicles covered by the same model years.

Construction Equipment Fuel Efficiency Standard

US EPA sets emission standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 horsepower (hp) and were phased in by 2000. A new standard was adopted in 1998 that introduced Tier 1 for all equipment below 50 hp and established the Tier 2 and Tier 3 standards. The Tier 2 and Tier 3 standards were phased in by 2008 for all equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004], and most recently updated in 2014 [79 Federal Register 46356]). Emissions requirements for new off-road Tier 4 vehicles were to be completely phased in by the end of 2015.

U.S. Consolidated Appropriations Act (Mandatory GHG Reporting)

The Consolidated Appropriations Act, passed in December 2007, required the establishment of mandatory GHG reporting requirements. In September 2009, the US EPA issued the Final Mandatory Reporting of Greenhouse Gases Rule, which became effective January 1, 2010. The rule requires reporting of GHG emissions from large sources and suppliers in the U.S, and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions are required to submit annual reports to the US EPA. The first annual reports for the largest emitting facilities, covering calendar year 2010, were submitted to US EPA in 2011.

Energy Policy and Conservation Act

Enacted in 1975, this legislation established fuel economy standards for new light-duty vehicles (autos, pickups, vans, and sport-utility vehicles). The law placed responsibility on the National Highway Traffic and Safety Administration, a part of the U.S. Department of Transportation (USDOT), for establishing and regularly updating vehicle standards. The U.S. Environmental Protection Agency (US EPA) administers the Corporate Average Fuel Economy (CAFE) program, which determines vehicle manufacturers' compliance with existing fuel economy standards. Since the inception of the program, the average fuel economy for new light-duty vehicles steadily increased from 13.1 miles per gallon (mpg) for the 1975 model year to 30.7 mpg for the 2014 model year and can increase to 54.5 by 2025.

On August 2, 2018, the NHTSA and US EPA, operating under the direction of the Trump Administration, proposed the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE Rule). This rule addresses emissions and fuel economy standards for motor vehicles and is separated in two parts as described below.

 Part One, "One National Program" (84 FR 51310) revokes a waiver granted by US EPA to the State of California under Section 209 of the CAA to enforce more stringent emission standards for motor vehicles than those required by US EPA for the explicit purpose of GHG reduction, and indirectly, criteria air pollutants and ozone precursor emission reduction. This revocation became effective on November 26, 2019, potentially restricting the ability of CARB to enforce more stringent GHG emission standards for new vehicles and set zero emission vehicle mandates in California.

Part Two addresses CAFE standards for passenger cars and light trucks for model years 2021 to 2026. This rulemaking proposes new CAFE standards for model years 2022 through 2026 and would amend existing CAFE standards for model year 2021. The proposal would retain the model year 2020 standards (specifically, the footprint target curves for passenger cars and light trucks) through model year 2026. The proposal addressing CAFE standards was jointly developed by NHTSA and US EPA, with US EPA simultaneously proposing tailpipe CO₂ standards for the same vehicles covered by the same model years.

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State Regulations

Assembly Bill 1493 (Pavley Regulations and Fuel Efficiency Standards)

AB 1493 (2002), California's Advanced Clean Cars program (referred to as Pavley), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, US EPA granted the waiver of the Clean Air Act preemption to California for its GHG emission standards for motor vehicles beginning with the 2009 model year. Pavley I regulates model years from 2009 to 2016, and Pavley II, which is now referred to as "Low Emission Vehicle (LEV) III GHG", regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the LEV, Zero Emissions Vehicles (ZEV), and Clean Fuels Outlet programs, and would provide major reductions in GHG emissions. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels.

Executive Order B-48-18: Zero-Emission Vehicles

On January 26, 2018, Governor Brown signed Executive Order B-48-18 requiring all State entities to work with the private sector to have at least 5 million zero-emission vehicles (ZEVs) on the road by 2030, as well as install 200 hydrogen fueling stations and 250,000 electric vehicle (EV) charging stations by 2025. It specifies that 10,000 of the EV charging stations should be direct current fast chargers. This order also requires all State entities to continue to partner with local and regional governments to streamline the installation of ZEV infrastructure. The Governor's Office of Business and Economic Development is required to publish a Plug-in Charging Station Design Guidebook and update the 2015 Hydrogen Station Permitting Guidebook to aid in these efforts. All State entities are required to participate in updating the 2016 Zero-Emissions Vehicle Action Plan, along with the 2018 ZEV Action Plan Priorities Update, which includes and extends the 2016 ZEV Action Plan (Governor's Interagency Working Group on Zero-Emission Vehicles 2016, 2018), to help expand private

investment in ZEV infrastructure with a focus on serving low-income and disadvantaged communities. The quantitative GHG analysis below is conservative as GHG benefits of this order have not been modeled.

Executive Order N-79-20

Governor Gavin Newsom signed Executive Order N-79-20 in September 2020, which sets a Statewide goal that 100 percent of all new passenger car and truck sales in the State will be zeroemissions by 2035. It also sets a goal that 100 percent of statewide new sales of medium- and heavy-duty vehicles will be zero emissions by 2045, where feasible, and for all new sales of drayage trucks to be zero emissions by 2035. Additionally, the Executive Order targets 100 percent of new off-road vehicle sales in the State to be zero emission by 2035. CARB is responsible for implementing the new vehicle sales regulation. The quantitative GHG analysis below is conservative as GHG benefits of this order have not been modeled.

Assembly Bill 32 (Global Warming Solutions Act and Scoping Plan)

California's major initiative for reducing GHG emissions is outlined in Assembly Bill (AB) 32, the "California Global Warming Solutions Act of 2006," which was signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 Statewide GHG level and 2020 limit of 427 million MTCO₂e. The Scoping Plan was approved by CARB on December 11, 2008 and included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

In May 2014, CARB approved the first update to the AB 32 Scoping Plan. The 2013 Scoping Plan Update defined CARB's climate change priorities for the next five years and set the groundwork to reach post-2020 Statewide goals. The 2013 Scoping Plan Update highlighted California's progress toward meeting the 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the State's longer-term GHG reduction strategies with other State policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use. The State of California achieved its 2020 GHG emission reduction targets in 2016, and emissions have subsequently fallen further in 2018 to 425 MMTCO₂e (CARB 2020).

Senate Bill 32 (Global Warming Solutions Act and Scoping Plan Extension)

Senate Bill (SB) 32 signed into law on September 8, 2016, tightens the requirements of AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies, such as SB 350 and SB 1383. The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, it recommends that local governments adopt policies consistent with statewide per capita goals of 6 MTCO₂e by

2030 and 2 MTCO₂e by 2050. As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level).

Senate Bill 100 (100 Percent Clean Energy Act)

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. PCE provides clean energy that is 100 percent carbon free, either sourced entirely from renewable energy (50 percent solar and 50 percent wind) or 52.2 percent renewable (including biomass & waste, geothermal, small hydroelectric, solar, and wind). PCE aims to provide only 100 percent renewable by 2025. (PCE 2022). PG&E's default power mix offers 29 percent renewable, and they offer customers options for 64 percent or 100 percent renewable power mixes (PG&E 2019).

Senate Bill 375 (Sustainable Communities and Climate Protection Act)

SB 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. In addition, SB 375 directs each of the State's 18 major Metropolitan Planning Organizations (MPOs) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. Southern California Association of Governments (SCAG) was assigned targets of an 8 percent reduction in GHGs from transportation sources by 2020 and a 19 percent reduction in GHGs from transportation sources by 2035. In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

Executive Order B-55-18

On September 10, 2018, Governor Brown issued Executive Order B-55-18, which established a new Statewide goal of achieving carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter. This goal is in addition to the existing Statewide GHG reduction targets established by SB 32, SB 100, SB 375, and SB 1383. University of California, as a State entity, is committed to its fair share of reduction measures in support of achieving carbon neutrality by 2045.

Senate Bill 97 and CEQA Guidelines Update

SB 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in CEQA documents. In March 2010, the California Natural Resources Agency adopted amendments to the CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHG and climate change impacts.

California Code of Regulations Title 24 (California Building Code)

Updated every three years through a rigorous stakeholder process, Title 24 of the California Code of Regulations requires California homes and businesses to meet strong energy efficiency measures,

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

thereby lowering their energy use. Title 24 contains numerous subparts, including Part 1 (Administrative Code), Part 2 (Building Code), Part 3 (Electrical Code), Part 4 (Mechanical Code), Part 5 (Plumbing Code), Part 6 (Energy Code), Part 8 (Historical Building Code), Part 9 (Fire Code), Part 10 (Existing Building Code), Part 11 (Green Building Standards Code), Part 12 (Referenced Standards Code). The California Building Code is applicable to all development in California. (Health and Safety Code §§ 17950 and 18938(b).)

The regulations receive input from members of industry, as well as the public, with the goal of "[r]educing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy." (Pub. Res. Code § 25402.) These regulations are scrutinized and analyzed for technological and economic feasibility (Pub. Res. Code § 25402(d)) and cost effectiveness (Pub. Res. Code § 25402(b)(2) and (b)(3)).

PART 6 - BUILDING ENERGY EFFICIENCY STANDARDS

CCR Title 24 Part 6 is the Building Energy Efficiency Standards. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. The Building Energy Efficiency Standards is updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. New construction and major renovations must demonstrate their compliance with the current Building Energy Efficiency Standards through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission. Under the 2019 standards, nonresidential buildings will be 30 percent more energy efficient. When accounting for the electricity generated by the solar photovoltaic system, residential buildings would use 53 percent less energy compared to buildings built to the 2016 standards.

The 2019 Building Energy Efficiency Standards, adopted on May 9, 2018, became effective on January 1, 2020. The 2019 Standards move toward cutting energy use in new residential units by more than 50 percent and will require installation of solar photovoltaic systems for single-family homes and multi-family buildings of three stories and less. The 2019 Standards focus on four key areas: 1) smart residential photovoltaic systems; 2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); 3) residential and nonresidential ventilation requirements; 4) and nonresidential lighting requirements. Under the 2019 Standards, non-residential buildings will be 30 percent more energy-efficient compared to the 2016 Standards, and single-family homes will be seven percent more energy efficient.

PART 11 - CALIFORNIA GREEN BUILDING STANDARDS

The California Green Building Standards Code, referred to as CALGreen, was added to CCR Title 24 as Part 11 first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 CBC). Current CALGreen institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory Green Building Standards and may adopt additional amendments for stricter requirements.

Mandatory standards require:

20 percent reduction in indoor water use relative to specified baseline levels;

- 50 percent construction/demolition waste diverted from landfills;
- Inspections of energy systems to ensure optimal working efficiency;
- Low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards; and
- Installation of EV charging stations at least three percent of the parking spaces for all new multifamily developments with 17 or more units.

Similar to the compliance reporting procedure for demonstrating Building Energy Efficiency Standards compliance in new buildings and major renovations, compliance with the CalGreen waterreduction requirements must be demonstrated through completion of water use reporting forms for new low-rise residential and non-residential buildings. Buildings must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CalGreen or a reduced per-plumbing-fixture water use rate.

Assembly Bill 341/Assembly Bill 1826 (Mandatory Recycling/Composting)

The California Integrated Waste Management Act of 1989, as modified by AB 341, requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows diversion away from landfills of 75 percent of all solid waste by 2020 and annually thereafter. AB 1826 requires recycling of organic waste (i.e., composting). All businesses and public entities that generate four or more cubic yards of solid waste per week and multi-family residential dwellings that have five or more units are required to recycle and compost.

Senate Bills 350 and 100 (Renewable Portfolio/Clean Energy and Pollution Reduction Act)

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources to be increased to 50 percent by December 31, 2030. This act also requires doubling of the energy efficiency in existing buildings by 2030.

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 44 percent by 2024, 60 percent by 2030, and 100 percent by 2045.

Assembly Bill 1493 (Reduce GHG Emissions from Vehicle Use)

AB 1493 (Chapter 200, Statutes of 2002), known as the Pavley Bill, amended Health and Safety Code Sections 42823 and added 43018.5 requiring CARB to develop and adopt regulations that achieve maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, lightduty trucks, and other vehicles used for noncommercial personal transportation in California.

Assembly Bill 1007 (State Alternative Fuels Plan)

AB 1007 (Chapter 371, Statutes of 2005) required the CEC to prepare a State plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other federal, State, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative non-

petroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-State production of biofuels without causing a significant degradation of public health and environmental quality.

CARB In-Use On-Road and Off-Road Diesel Rules

The CARB rule imposes limits on idling, restricts the addition of older vehicles, and requires the retirement or replacement of older engines depending on their fleet size category. This policy indirectly impacts energy consumption.

More specifically, CARB is also charged with developing air pollution control regulations based upon the best available control measures and implementing feasible control measures under the State and Federal Clean Air Act. (Health & Saf. Code, §§ 39602.5, 39667, 43013, subds. (a) and (h), 43018, 40600, 40601, 40612(a)(2) and (c)(1)(A).) Pursuant to these statutory authorities , more stringent emission standards were adopted in 2004 for off-road construction equipment (i.e. "Tier 4" standards) (40 Code of Federal Regulations Parts 1039, 1065, and 1068; Cal. Code Regs., tit. 13, § 2025; AR 2854). CARB also adopted emission standards for on-road heavy duty diesel vehicles (i.e. haul trucks). (Cal. Code Regs., tit. 13, § 1956.8.) These haul truck regulations mandate fleet turnover to ensure that by January 1, 2023 nearly all on-road diesel trucks will have 2010 model year engines or equivalent [i.e. Tier 4]. In addition, interim steps are incorporated into the regulations (e.g., vehicles older than 1999 will be replaced with newer engines by 2020).

California Advance Clean Trucks Program

In June 2020, CARB approved the Advanced Clean Trucks regulation, which requires manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. In addition, the regulation requires company and fleet reporting for large employers and fleet owners with 50 or more trucks. By 2045, all new trucks sold in California must be zero-emission. Implementation of this regulation would reduce consumption of nonrenewable transportation fuels as trucks transition to alternative fuel sources.

Executive Order B-48-18: Zero-Emission Vehicles

On January 26, 2018, Governor Brown signed Executive Order B-48-18 requiring all State entities to work with the private sector to have at least 5 million zero-emission vehicles (ZEVs) on the road by 2030, as well as install 200 hydrogen fueling stations and 250,000 electric vehicle (EV) charging stations by 2025. It specifies that 10,000 of the EV charging stations should be direct current fast chargers. This order also requires all State entities to continue to partner with local and regional governments to streamline the installation of ZEV infrastructure. The Governor's Office of Business and Economic Development is required to publish a Plug-in Charging Station Design Guidebook and update the 2015 Hydrogen Station Permitting Guidebook to aid in these efforts. All State entities are required to participate in updating the 2016 Zero-Emissions Vehicle Action Plan, along with the 2018 ZEV Action Plan Priorities Update, which includes and extends the 2016 ZEV Action Plan (Governor's Interagency Working Group on Zero-Emission Vehicles 2016, 2018), to help expand private investment in ZEV infrastructure with a focus on serving low-income and disadvantaged communities.

Executive Order N-79-20

Governor Gavin Newsom signed Executive Order N-79-20 in September 2020, which sets a statewide goal that 100 percent of all new passenger car and truck sales in the State will be zeroemissions by 2035. It also sets a goal that 100 percent of statewide new sales of medium- and heavy-duty vehicles will be zero emissions by 2045, where feasible, and for all new sales of drayage trucks to be zero emissions by 2035. Additionally, the Executive Order targets 100 percent of new off-road vehicle sales in the State to be zero emission by 2035. CARB is responsible for implementing the new vehicle sales regulation.

Regional and Local Regulations

Plan Bay Area 2050

Plan Bay Area 2050 is a State-mandated, integrated long-range transportation, land-use, and housing plan, known as a Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), that would support a growing economy, provide more housing and transportation choices and reduce transportation-related pollution in the nine-county San Francisco Bay Area. Plan Bay Area 2050 builds on earlier efforts to develop an efficient transportation network and grow in a financially and environmentally responsible way. Plan Bay Area 2050 focuses on advancing equity and improving resiliency in the Bay Area by creating strategies in the following four elements: Housing, Economy, Transportation, and Environment. The Plan discusses how the future is uncertain due to anticipated employment growth, lack of housing options, and outside forces, such as climate change and economic turbulence. These uncertainties will impact growth in the Bay Area and exacerbate issues for those who are historically and systemically marginalized and underserved and excluded. Thus, Plan Bay Area 2050 has created strategies and considered investments that will serve those systemically underserved communities and provide equitable opportunities. The Plan presents a total of 35 strategies to outline how the \$1.4 trillion dollar investment would be utilized. The strategies include, but are not limited to, the following: providing affordable housing, allowing higher-density in proximity to transit-corridors, optimizing the existing roadway network, creating complete streets, providing subsides for public transit, reducing climate emissions, and expanding open space area. To bring these strategies to fruition, it will require participation by agencies, policymakers, and the public. An implementation plan is also included as part of the Plan to assess the requirements needed to carry out the strategies, identify the roles of pertinent entities, create an appropriate method to implement the strategies, and create a timeline for implementation.

San Mateo Countywide Transportation Action Plan 2040 (SMTCP)

In 2017, the C/CAG Board of Directors adopted the SMCTP 2040 to provide San Mateo County with a long-range, comprehensive transportation plan for identifying and resolving transportation issues. Transportation planning objectives and policies include integration of transportation and land use plans for sustainable commuting with surrounding counties in the Bay Area.

Millbrae Climate Action Plan (CAP)

The Millbrae 2020 CAP addresses municipal and communitywide GHG emissions and includes a goal of reducing communitywide GHG emissions output to 93,887 MTCO₂e by 2030 (consistent with California Senate Bill 32 target for 2030).³² The City is using the 49 percent emissions reduction

³² Millbrae, City of. 2020. Final Climate Action Plan. October 27. Available at:

https://www.ci.millbrae.ca.us/home/showpublisheddocument/24105/637405337457930000

target of 92,025 MT CO₂e for 2030, with 2005 as the baseline year. The 2020 CAP is based upon the 2015 community-level inventory and includes a list of actions or "measures" to achieve Millbrae's sustainability goals. The 2020 CAP goals also provide substantial progress towards achieving the State's long-term GHG reduction goal of carbon neutrality by 2045. The 2020 CAP includes a compliance checklist to determine consistency for proposed projects with these goals.

3.6.4 Impacts and Mitigation Measures

Significance Criteria

The City of Millbrae utilizes the following 2022 CEQA Guidelines Appendix G significance criteria questions related to GHG Emissions and Energy.

Would the 2040 General Plan or Specific Plan:

- a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?
- c) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
- d) Conflict with or obstruct a State of local plan for renewable energy or energy efficiency?

Approach to Analysis

GHG Emissions

Based on plan-level guidance from the 2022 BAAQMD *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans,* GHG emissions associated with implementation of the 2040 General Plan and Specific Plan are discussed qualitatively by comparing the proposed plans to the 2022 BAAQMD GHG thresholds. This involves a detailed analysis of policies with the Millbrae 2020 CAP via utilization of the CEQA GHG Checklist. In addition, the plans are qualitatively compared to other applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs.

Energy

Energy consumption is analyzed herein in terms of construction and operational energy. Construction energy demand accounts for anticipated energy consumption during construction of development facilitated by the proposed plans, such as fuel consumed by construction equipment and construction workers' vehicles traveling to and from the construction site. Operational energy demand accounts for the anticipated energy consumption during operation of the development facilitated by the proposed plans, such as fuel consumed by cars, trucks, and public transit; natural gas consumed for on-site power generation and heating building spaces; and electricity consumed for building power needs, including, but not limited to lighting, water conveyance, and air conditioning. This analysis considers the equipment and processes employed during construction and operation of 2040 General Plan and Specific Plan development to qualitatively determine whether energy consumed during construction and operation would be wasteful, inefficient, or unnecessary.

EIR Scoping Comments Consideration

This section also addressed comments received in response to the EIR NOP related to analysis of GHG emissions. Assessment of GHG emissions is discussed under Impact GHG-1.

Specific Thresholds of Significance

GHG Emissions Generation

Individual projects do not generate sufficient GHG emissions to influence climate change directly. However, physical changes caused by a project can contribute incrementally to significant cumulative effects, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a plan or project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines Section 15064[h][1]).

On the plan level, the 2022 BAAQMD CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans contains two approaches for determining significance of GHGs:

- 1. Evaluation of whether a plan or project meets State goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045; or
- 2. Evaluation of consistency with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

If a plan is not consistent with one of these approaches, it could be considered to have an incremental significant impact on GHG emissions.

According to CEQA Guidelines Section 15183.5 and the 2022 BAAQMD *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans*, a qualified GHG reduction strategy must:

- Quantify GHG emissions, both existing and projected over a specified period, resulting from activities in a defined geographic area
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable
- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated in the geographic area
- Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level
- Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels
- Be adopted in a public process following environmental review

The Millbrae 2020 CAP meets these requirements as a qualified GHG reduction strategy and meets the State's goals to reduce emissions to 40 percent below 1990 levels by 2030. While the CAP

provides goals to achieve substantial progress towards the 2045 goal of carbon neutrality, it does not lay out specific measures to meet that goal.

Energy

The City of Millbrae does not have quantitative thresholds for evaluation of energy; however, the following qualitative thresholds are used to evaluate the significance of energy impacts resulting from implementation of the proposed plans if it would:

- Result in a wasteful, inefficient, and unnecessary consumption of energy during construction and operational activities; or if
- Construction and operation of buildings and appliances would not adhere to the energy-use reduction measures included in CALGreen and required by the Millbrae CAP.

Impact Evaluation

Effects of GHG Emissions and GHG Reduction Plans Consistency

Significance Criterion a:	Would the proposed plans generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
Significance Criterion b:	Would the proposed plans conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

Impact GHG-1 IMPLEMENTATION OF THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD BE CONSISTENT WITH THE MILLBRAE CAP, WHICH MEETS STATE 2030 GOALS AND PROVIDES GOALS TO ACHIEVE PROGRESS TOWARDS BUT DOES NOT MEET THE STATE 2045 GOAL. MITIGATION MEASURES GHG-1 AND GHG-2 WOULD RESULT IN CEQA GHG THRESHOLDS AND A CAP UPDATE; HOWEVER, DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD NOT MEET THE 2045 GOAL UNTIL THE CAP IS UPDATED. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

Development facilitated by the 2040 General Plan and Specific Plan would result in GHG emissions during construction. GHG emissions during construction would result primarily from fuel consumption associated with heavy equipment, light-duty vehicles, machinery, and generators for lighting. Temporary grid power may also be provided to construction trailers or electric construction equipment that may result in indirect GHG emissions from the energy generation. Development facilitated by the 2040 General Plan and Specific Plan would utilize construction contractors that comply with applicable CARB regulations such as accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment, and restricted idling of heavy-duty diesel motor vehicles. Construction contractors are required to comply with the provisions of CCR Title 13, sections 2449 and 2485, prohibiting diesel-fueled commercial and off-road vehicles from idling for more than five minutes, minimizing unnecessary GHG emissions. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would minimize inefficient fuel consumption and thus GHG emissions. These construction equipment standards (i.e., Tier 4 efficiency requirements) are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068. Per applicable regulatory requirements of CALGreen, development facilitated

by the 2040 General Plan and Specific Plan would comply with construction waste management practices to divert construction and demolition debris from landfills. These practices would result in efficient use of energy by construction facilitated by the project and therefore would minimize unnecessary GHG emissions. Furthermore, in the interest of cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary, which would also have the effect of minimizing GHG emissions.

Pursuant to the 2022 BAAQMD *CEQA Thresholds for Evaluating the Significance of Climate Impacts From Land Use Projects and Plans,* BAAQMD does not recommend a construction-related climate impact threshold. According to BAAQMD, greenhouse gas emissions from construction represent a very small portion of a project's lifetime GHG emissions. The proposed thresholds for land use projects are designed to address operational GHG emissions that represent the vast majority of project GHG emissions. Therefore, the evaluation of GHG emissions impacts associated with implementation of the 2040 General Plan and Specific Plan is focused on operational emissions, discussed below.

Operation

2040 GENERAL PLAN

Development facilitated by the 2040 General Plan would result in GHG emissions during operation. GHG emissions during operation would result primarily from building energy usage and fuel consumption associated with light-duty vehicles. It should be noted that (since land use changes and development facilitated by 2040 General Plan would be located in the Specific Plan area) 2040 General Plan GHG emissions impacts would be related to development in the Specific Plan area. The 2040 General Plan contains policies that aim to reduce operational GHG emissions in accordance with State 2030 GHG emissions reductions goals and provide substantial progress to the State's goal of carbon neutrality by 2045. Proposed 2040 General Plan policies related to GHG emissions reductions include:

- Goal LU-1 Integrate new development with the fabric of the surrounding neighborhoods to create a cohesive community.
 - Policy LU-1.1 Prioritize New Development in Specific Plan Areas. The City shall prioritize higher density and intensity development around the Millbrae Station, along El Camino Real, and in Downtown. The City shall use specific plans for these areas to ensure new development is context sensitive, contributes to a positive city image, and preserves the positive qualities of surrounding neighborhoods.
 - Policy LU-1.3Clear and Predictable Development Standards. The City shall adopt objective
development standards to facilitate an efficient development review process,
promote cost-effective development, decrease City staff review time, and
ensure new development meets the expectations of the City.

Goal LU-2 Support a variety of housing opportunities and improve access to housing for all community members.

Policy LU-2.3 Housing Near Jobs. The City shall support opportunities that enable people to live close to job locations.

Goal LU-3 Preserve and enhance the identity and qualities of Millbrae's distinct residential neighborhoods to ensure Millbrae remains a desirable place to live.

- **Policy LU-3.7** Walkable Neighborhoods. The City shall promote the pedestrian-scaled environment and walkable neighborhoods by supporting and providing alternative modes of transportation, enhancing bike and pedestrian connectivity to local commercial districts and the Millbrae Station, and maintaining or requiring owner maintenance of public sidewalks, public plazas, parks, greenways, parkways, street tree canopies, and landscaping throughout residential neighborhoods.
- **Policy LU-7.4 High Density, Mixed-Use Development**. The City shall encourage high density, mixed-use development in the Station Area with restaurants, retail, entertainment, offices, and residential to promote the creation of a compact, walkable, transit-oriented district.
- Goal M-1 Design, build, maintain, and operate streets to be safe and accessible for all users, regardless of their age, ability, or whether they are walking, bicycling, taking transit, or driving.
 - **Policy M-1.1** Serving All Users. The City shall develop, or require new development to incorporate into proposed projects, complete streets infrastructure, where applicable, sufficient to provide safe, comfortable, and convenient travel along and across streets to serve all types of travel (including pedestrians, bicyclists, motorists, movers of commercial goods, micromobility, and public transportation), and users (including persons with disabilities, seniors, children, and families).
 - **Policy M-1.2 Multimodal Choices**. The City shall promote development of an integrated, multimodal transportation system that offers desirable choices among travel modes including micromobility, pedestrian ways, bikeways, public transportation, and roadways.
 - **Policy M-1.4** Accessibility and Connectivity. The City shall create a more comprehensive multimodal transportation system by identifying and eliminating gaps in roadways, bikeways, and pedestrian networks; increasing transit access in underserved areas; and removing natural and man-made barriers to accessibility and connectivity.
 - Policy M-1.14 Establish VMT Threshold. The City, in coordination with the City/County Association of Governments of San Mateo County (C/CAG) as the designated Congestion Management Agency for the County, shall implement and require compliance with vehicle miles traveled (VMT) thresholds based on VMT per population and/or employment for the purpose of environmental review under the California Environmental Quality Act (CEQA), but continue to implement Policy M-1.12: Measuring Vehicle Level of Service (LOS) for the purpose of planning and designing street improvements.

- Goal M-2 Provide an efficient, convenient, and accessible public transit system for residents, workers, and visitors in Millbrae.
 - Policy M-2.1 Caltrain and BART. The City shall coordinate with Caltrain and BART to assure the Millbrae Station is well-maintained, has adequate parking, a safe environment, and continues to provide high-quality service.
 - Policy M-2.2 California High Speed Rail. The City shall continue to work with and strongly advocate that the California High-Speed Rail Authority plan a high-quality, well-designed Millbrae-SFO Station that enhances access and services and fully integrates all transit modes serving the Station into a single station and is also coordinated and interconnected with the surrounding environment including development projects. The City will continue to request that a variety of alternatives are considered, including alternatives that provide the least impact on the community.
 - Policy M-2.3 Bus and Shuttle Service. The City shall work with SamTrans, other agencies, private companies, and organizations to provide and manage appropriate community-serving transit service and coordination of schedules and services with other transit agencies. Shuttle service should focus on connecting transit, hotels, and employment centers with the City's Downtown.
- Goal M-3 Provide a robust and interconnected bicycle and pedestrian circulation system throughout the city that promotes healthy lifestyles and is a viable alternative to automobile use.
 - Policy M-3.1Active Transportation Plan. The City shall maintain and implement the Active
Transportation Plan to enhance the city's bicycle and pedestrian network.
 - Policy M-3.2 Trail Access. The City shall enhance the system of pathways providing access to the Spur Trail, the Bay Trail, the Bay Area Ridge Trail, the Crystal Springs Regional Trail, and closing gaps in the trail system.
 - Policy M-3.3 Trail Access. The City shall enhance the system of pathways providing access to the Spur Trail, the Bay Trail, the Bay Area Ridge Trail, the Crystal Springs Regional Trail, and closing gaps in the trail system.
 - Policy M-3.4Bay Trail. The City shall support the completion of the Bay Trail in
coordination with regional agencies, and the selection of the trail route and
implementation of the trail system in an appropriate alignment between
Millbrae and South San Francisco.
 - Policy M-3.5 Bicycle Lanes on El Camino Real. The City shall explore options for providing separated or buffered bicycle lanes along El Camino Real and developing parallel alternative routes to the El Camino Real route to provide for connectivity for bicyclists of all ages and abilities, consistent with the Active Transportation Plan and Downtown and El Camino Real Specific Plan.
 - Policy M-3.7Bicycle and Pedestrian Facilities. The City shall evaluate new commercial,
multifamily residential, and mixed-use development projects to ensure that
the project provides bicycle and pedestrian facilities approved by the
Community Development Department, adjacent to the project site.
Improvements could include secure bicycle parking, streetlights, street

furniture, landscaping, trash receptacles, pedestrian-scaled lighting fixtures, shade, and public art.

- Policy M-3.11 Bicycle Parking. The City shall designate locations for mobility hubs and modify existing city infrastructure to accommodate shared bicycles, electric bikes and scooters that provide last-mile solutions to residents and commuters. Infrastructure enhancements include dedicated off-street parking spaces and on-street corrals to accommodate shared electric bike and scooter parking and prevent conflicts with pedestrians.
- Goal M-4 Ensure an adequate supply of parking that provides safe and efficient circulation.
 - Policy M-4.6 Electric Vehicle Charging Stations. The City shall work with large employers to expand EV charging in existing buildings and within public parking areas to incentivize EV ownership.
 - Policy M-4.9 Clean Air Vehicle Parking. The City shall require all new development to provide parking spaces devoted to clean air vehicles.
- Goal M-5 Implement transportation demand management strategies and programs to reduce vehicle miles traveled, traffic congestion, and parking demand.
 - **Policy M-5.1 Countywide TDM Programs Participation**. The City shall continue to participate in countywide TDM programs to assist employers and employees in reducing the use of single-occupancy vehicles and promoting and incentivizing the use of transit, active transportation (i.e., non-motorized transportation), and carpooling/vanpooling.
 - Policy M-5.2 San Mateo County Congestion Management Program. The City, in coordination with the City/County Association of Governments of San Mateo County (C/CAG) as the designated Congestion Management Agency for the County, shall implement the County Congestion Management Program and the Land Use Impact Analysis Program, otherwise known as the Transportation Demand Management (TDM Policy). The TDM Policy establishes project review thresholds, vehicle trip reduction and mode share targets, monitoring and reporting requirements, and TDM measures.
 - Policy M-5.3 Bay Area Commuter Benefits Program. The City shall continue to support the Bay Area Commuter Benefits Program, to improve air quality, reduce emissions of greenhouse gases and other air pollutants, and to decrease traffic congestion in the Bay Area by encouraging employees to commute by transit, carpooling, biking, and other alternative modes.
 - **Policy M-5.4 Car Sharing**. The City shall explore opportunities to partner with car sharing companies to establish designated car sharing spaces and vehicles in the City, and the City shall explore opportunities for car sharing companies to occupy any required parking spaces on private property provided the cars are made available to the general public.
 - Policy M-5.5 Electric Transportation Network Company Vehicles. The City shall encourage the use of EV Transportation Network Company Vehicles (TNCs) in the community.

Goal M-6 Develop balanced housing and employment opportunities to reduce vehicle miles traveled

Policy M-6.1 Agency Coordination. The City shall coordinate with San Francisco International Airport, the High-Speed Rail Authority, Caltrans, the Peninsula Corridor Joint Powers Board, Metropolitan Transportation Commission (MTC), the San Francisco Bay Area Rapid Transit District, the San Mateo County Transit District, the City/County Association of Governments of San Mateo County and other transit providers and transportation agencies, to meet the travel needs of Millbrae residents, workers, and visitors.

Goal HSHM-1 Improve the health of and quality of life for all Millbrae residents.

- Policy HSHM-1.3 Physical Activity and the Built Environment. The City shall support new developments or infrastructure improvements in existing neighborhoods that enable people to drive less and walk, bike, or take public transit more.
- Goal HSHM-3 Improve the sustainability and resiliency of the City through continued efforts to reduce the causes of and adapt to climate change.
 - Policy HSHM-3.1 Reduce Climate Change Impacts. The City shall support plans, standards, regulations, incentives, and investments to reduce the impacts of climate change as outlined in the 2020 Climate Action Plan.
 - Policy HSHM-3.2 Monitor Climate Change Risks. The City shall monitor information from regional, State, and Federal agencies on the effects of climate change, including rising sea levels in the San Francisco Bay, to determine if the City should implement additional adaptation strategies.
 - Policy HSHM-3.6 Sustainable Building and Site Design Practices. The City shall require new development to employ sustainable building and site design practices, consistent with California Green Building Standards Code (CALGreen) and the City of Millbrae Municipal Code Title 9 Buildings and Fire Regulations, Chapter 9.50 Energy Code and Chapter 9.35 Green Building Code including requirements for sustainable reach standards.
- Goal NRC-4 Reduce emissions of criteria air pollutants and reduce exposure to toxic air contaminants and fine particulate matter to improve regional air quality and protect the health of Millbrae residents.
 - Policy NRC-4.4 Preferences for Reduced-Emission Equipment. The City shall give preference to contractors using reduced-emission equipment for City construction projects and contracts for services (e.g., garbage collection), as well as businesses that practice sustainable operations.
- Goal NRC-5 Increase renewable energy resource use and encourage energy efficiency practices to reduce community energy use
 - **Policy NRC-5.2 Reduce Heat Island Effect**. The City shall encourage efforts and continually evaluate sustainable measures that reduce the heat island effect, reduce energy consumption, and contribute to carbon mitigation including the planting of trees and other vegetation and installation of cool roofs.

- **Policy NRC-5.3** Zero Net Energy Building. The City shall support opportunities to achieve zero net energy use for new buildings or the retrofitting of existing buildings in accordance with State laws and encourage existing buildings to achieve energy efficiencies.
- Policy NRC-5.4 Renewable Energy Sourcing and Storage. The City shall encourage and support the generation, transmission, use, and storage of renewable energy and continue its participation and support for Peninsula Clean Energy.
- Policy NRC-5.5Electric Vehicles. The City shall encourage and support expanding Electric
Vehicle (EV) charging stations and the purchase of electric vehicles.
- **Policy NRC-5.6 Green Building Ordinance**. The City shall adopt and apply the most recent Green Building Standards Code (CALGreen) to new municipal, commercial, and residential structures, remodels, and additions. The City shall also consider updates for additional "reach code" mandatory requirements for new development, such as solar hot water systems or cool roofs.
- **Policy NRC-5.7** Energy Efficient Municipal Buildings. The City shall consider CALGreen Tier 1 energy performance, along with LEED Silver or Gold equivalent status for new municipal buildings to maximize energy efficiency.
- Policy NRC-5.8 Energy Efficiency Education. The City shall continue to work with energy utilities and regional partners to educate residents and business owners about renewable energy and energy efficiency, including available programs and incentives, and strategies to help residents and business owners reduce their energy demand and energy-related GHG emissions.
- Policy NRC-5.9 Energy Retrofit Incentives and Rebates. The City shall promote participation in residential and commercial energy efficiency programs, including BayREN's programs, San Mateo County Energy Watch and PG&E's or Peninsula Clean Energy's efficient appliance rebates.
- Policy NRC-5.10 Energy Audits. The City shall encourage residential and commercial energy audits.
- Policy NRC-5.11 Transportation Energy Use Reduction. The City shall encourage smart development, infill development, transportation demand management, and programs which support alternative modes of transportation, including the City's partnership with Commute.org.
- Goal NRC-6 Reduce solid waste generation, increase recycling and composting, and provide for the adequate collection and disposal of solid waste.
 - **Policy NRC-6.1** Solid Waste Diversion and Recycling. The City shall encourage increased community participation in recycling and composting programs and weekly collection of recyclables and organic waste to achieve set diversion goals consistent with governing law.
 - **Policy NRC-6.2 Construction and Demolition Waste**. The City shall continue to require all developments to comply with the current CALGreen requirements for construction and demolition waste diversion.

- Goal NRC-7 Strengthen efforts to reduce greenhouse gas emissions from local sources to combat global climate change.
 - **Policy NRC-7.1 City Trip Reduction**. The City shall promote reduced idling, trip reduction, routing for efficiency, and the use of public transportation, carpooling, telecommuting, alternative scheduling, and alternate modes of transportation for operating City departments and City employees.
 - **Policy NRC-7.2 City Vehicle Replacement**. When replacing vehicles, the City shall purchase zero-emission vehicles, if a zero-emission vehicle is feasible based on use, for the City's fleet and use renewable fuel sources, such as bio-diesel for trucks and heavy equipment. If a zero-emission or renewable fuel vehicle is not feasible based on use, then the City shall consider a hybrid or fuel-efficient vehicle.
 - **Policy NRC-7.3 Climate Action Plan Compliance**. The City shall require all new development to comply with relevant Climate Action Plan strategies and measures.
 - **Program C** Green Infrastructure Plan. The City shall implement and update (as needed) the Green Infrastructure Plan, adopted by City Council in September 2019, in accordance with Provision C.3.J of the Municipal Regional Permit that describes how the City will evaluate and shift toward green infrastructure over time.
 - Program DEnergy Conservation Ordinance. The City shall prepare an Energy
Conservation Ordinance for residential and commercial development. The
Ordinance shall include minimum energy efficiency and water efficiency
standards at the time of building sale.
 - **Program E** Streetlight Retrofit. The City shall continue to retrofit streetlights with lightemitting diode (LED) fixtures for energy efficiency and reduced maintenance.
 - Program F City Building Audits and Reports. The City shall conduct an energy efficiency audit of City-owned buildings every five years to identify opportunities for efficiency improvements from both operations and equipment upgrades. The City shall prepare and submit a report to the City Council that summarizes the results of the audit and makes recommendations for improvements that will improve energy efficiency.
 - Program GEnergy Information and Outreach. The City shall continue its public
information campaign to encourage energy conservation through energy
conservation and renewable energy programs, including the PG&E
Commercial Energy Efficiency Programs, the PACE Program, and the Small
Residential Rooftop Solar Energy Systems Readiness Ordinance.
 - **Program K** Maintain GHG Emissions Inventory. The City shall review and update the GHG emissions inventory for municipal and communitywide GHG emissions every five years.
 - Program LClimate Action Plan. The City shall review, and update Climate Action Plan
that establishes strategies to reduce GHG emissions every five years. Climate
Action Plan implementation shall include adopting the following ordinances:
Latest CALGreen Code; and Local amendments to implement "Reach Codes."

2040 General Plan Consistency with Millbrae 2020 CAP

As stated above in *Specific Thresholds of Significance*, the two options for plan consistency with BAAQMD GHG thresholds includes meeting the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045, or being consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b). To determine consistency with the 2020 Millbrae CAP, a local GHG reduction, Table 3.6-6 provides the 2040 General Plan's consistency with the 2020 CAP utilizing the Millbrae CEQA GHG Checklist.

Regulation	Requirements	Consistency
Land Use		
Smart Growth		
Climate Action Plan (Measure 23)	All Project Types Smart Growth. Will the Project/Plan include infill, transportation-oriented, and/or mixed- use development that meets or exceeds the maximum density allowed under the existing zoning and General Plan land use designation?	Consistent. The 2040 General Plan would support this measure through policies that emphasize high- density development and development friendly to alternative methods of transportation. For example, proposed Policy LU-3.7 would promote walkable neighborhoods by supporting and providing alternative modes of transportation, and Policy LU- 7.4 would encourage high density, mixed-use development in the Station Area.
Green Building Stand	ards	
Climate Action Plan (Measure 2)	Residential Green Building Ordinance. Will the Project/Plan include construction and operational commitment to comply with the latest version of CALGreen Code for residential new construction and remodels?	Consistent. Projects in the State are required to comply with the CALGreen Code, and proposed Policy NRC-5.6 states that the City shall adopt and apply the most recent Green Building Standards Code to new municipal, commercial, and residential structures, remodels, and additions. In addition, Program D states that the City must prepare an Energy Conservation Ordinance for residential and commercial development. The Ordinance would include minimum energy efficiency and water efficiency standards at the time of building sale.
Climate Action Plan (Measure 1)	Commercial Green Building Ordinance. Will the Project/Plan include construction and operational commitment to comply with the latest version of CALGreen Code for commercial new construction and remodels?	Consistent. Projects in the State are required to comply with the CALGreen Code, and proposed Policy NRC-5.6 states that the City shall adopt and apply the most recent Green Building Standards Code to new municipal, commercial, and residential structures, remodels, and additions. In addition, proposed Program D states that the City shall prepare an Energy Conservation Ordinance for residential and commercial development. The Ordinance must include minimum energy efficiency and water efficiency standards at the time of building sale.
Climate Action Plan (Measure 19)	Municipal Green Building Policy. Will the Project/Plan include construction and operational commitment to comply with CALGreen Code and City Reach Codes for building electrification and to achieve LEED Silver or Gold status (or	Consistent. Projects in the State are required to comply with the CALGreen Code; in addition, proposed Policy NRC-5.6 states that the City shall adopt and apply the most recent Green Building Standards Code to new municipal, commercial, and residential structures, remodels, and additions, and proposed Policy HSHM-3.6 states that new development shall be required to employ sustainable

Table 3.6-5	Millbrae 2020 Climate Action Plan Consistency	v – 2040 General Plan

Regulation	Requirements	Consistency
	equivalent) for municipal new construction and remodels?	building and site design practices, consistent with CALGreen and the City of Millbrae City of Millbrae Municipal Code Title 9 Buildings and Fire Regulations, Chapter 9.50 Energy Code and Chapter 9.35 Green Building Code including requirements for sustainable reach standards. In addition, under Policy NRC-5.7 the City would consider CALGreen Tier 1 energy performance, along with LEED Silver or Gold equivalent status for new municipal buildings to maximize energy efficiency.
Energy		
Energy Efficiency		
Climate Action Plan (Measure 3)	Residential Energy Efficiency Incentives and Rebates. Will the Project/Plan participate in residential energy efficiency programs (including BayREN Home+ program, San Mateo County Energy Watch, and PG&E efficient appliance rebates) and conduct residential energy audits?	Consistent. Through proposed Policy NRC-5.9, the City would promote participation in residential energy efficiency programs, including BayREN's Home+ program, San Mateo County Energy Watch and PG&E's efficient appliance rebates. Through proposed Policy NRC-5.10, the City shall encourage residential and commercial energy audits. Under proposed Policy NRC-5.6, as part of the City updating its Green Building Ordinance, it will consider updates for additional "reach code" mandatory requirements for new development, such as solar hot water systems or cool roofs that would potentially benefit from such programs. In addition, through proposed Policy NRC-5.3 and 5.4, the City would support zero net energy use in buildings and the use of renewable energy. Finally, implementation of Program G would have the City continue its public information campaign to encourage energy conservation through energy conservation and renewable energy programs, including the PG&E Commercial Energy Efficiency Programs, the PACE Program, and the Small Residential Rooftop Solar Energy Systems Readiness Ordinance.
Climate Action Plan (Measure 4)	Commercial Energy Efficiency Programs. Will the Project/Plan participate in commercial energy efficiency programs and demand response programs (including SMC Energy Watch and PG&E appliance rebates, 0% energy efficiency financing, and demand response programs) and conduct commercial energy audits?	Consistent. Through Policy NRC-5.10, the City would encourage residential and commercial energy audits. Under proposed Policy NRC-5.6, as part of the City updating its Green Building Ordinance, it would consider updates for additional "reach code" mandatory requirements for new development, such as solar hot water systems or cool roofs that would potentially benefit from such programs. In addition, through proposed Policy NRC-5.3 and 5.4, the City would support zero net energy use in buildings and the use of renewable energy. Finally, implementation of proposed Program G would have the City continue its public information campaign to encourage energy conservation through energy conservation and renewable energy Efficiency Programs, the PACE Program, and the Small Residential Rooftop Solar Energy Systems Readiness Ordinance.

Regulation	Requirements	Consistency
Climate Action Plan (Measure 17)	Municipal Buildings Energy Efficiency. Will the Project/Plan participate in San Mateo County Energy Watch, leverage benchmarking to identify opportunities for energy-efficient upgrades and track energy performance, as well as conduct municipal energy audits?	Consistent. Through proposed Policy NRC-5.7, the City would consider CALGreen Tier 1 energy performance, along with LEED Silver or Gold equivalent status for new municipal buildings to maximize energy efficiency. Under proposed Policy NRC-5.6, as part of the City updating its Green Building Ordinance, it will consider updates for additional "reach code" mandatory requirements for new development, such as solar hot water systems or cool roofs that would potentially benefit from such programs. In addition, through proposed policies NRC-5.3 and 5.4, the City would support zero net energy use in buildings and the use of renewable energy.
Climate Action Plan (Measure 5)	Residential Energy Conservation Program. Will the Project/Plan comply with the most recent residential energy conservation ordinance by meeting minimum energy-efficiency standards upon the sale of the building?	Consistent. Proposed Program D, Energy Conservation Ordinance, states that the City shall prepare an Energy Conservation Ordinance for residential and commercial development. The Ordinance must include minimum energy efficiency and water efficiency standards at the time of building sale.
Climate Action Plan (Measure 6)	Commercial Energy Conservation Program. Will the Project/Plan comply with the most recent commercial energy conservation ordinance by meeting minimum energy-efficiency standards upon the sale of the building?	Consistent. Proposed Program D, Energy Conservation Ordinance, states that the City shall prepare an Energy Conservation Ordinance for residential and commercial development. The Ordinance would include minimum energy efficiency and water efficiency standards at the time of building sale.
Climate Action Plan (Measure 14)	Municipal Energy Efficient Street Lighting. Will the Project/Plan include efficient street, signal, park, and parking lot lighting?	Consistent. Proposed Policy HSHM-3.6 states that new development shall be required to employ sustainable building and site design practices, consistent with CALGreen and the City of Millbrae City of Millbrae Municipal Code Title 9 Buildings and Fire Regulations, Chapter 9.50 Energy Code and Chapter 9.35 Green Building Code including requirements for sustainable reach standards. In addition, proposed Program E states that the City shall continue to retrofit streetlights with light- emitting diode (LED) fixtures for energy efficiency and reduced maintenance Consistency with these requirements would include municipal uses implementing energy efficient street lighting, as applicable.
Climate Action Plan (Measure 15)	Municipal Environmentally Preferred Energy Purchasing Policy. Will the Project/Plan include Energy Star equipment as part of sustainable purchasing?	Consistent. Proposed Policy HSHM-3.6 states that new development shall be required to employ sustainable building and site design practices, consistent with CALGreen and the City of Millbrae City of Millbrae Municipal Code Title 9 Buildings and Fire Regulations, Chapter 9.50 Energy Code and Chapter 9.35 Green Building Code including requirements for sustainable reach standards. Consistency with these requirements would include municipal uses purchasing Energy Star equipment, as applicable.

Regulation	Requirements	Consistency	
Climate Action Plan (Measure 7)	All Project Types Tree Planting Program. Will the Project/Plan provide shade trees for buildings with eastern, western, or southern exposures?	Consistent. Proposed Policy NRC-5.2 states that the City would encourage efforts and continually evaluate sustainable measures that reduce the heat island effect, reduce energy consumption, and contribute to carbon mitigation including the planting of trees and other vegetation. These types of initiatives will require projects to provide shade trees as feasible.	
Renewable Energy			
Climate Action Plan (Measure 11)	Residential & Commercial Participation in Community Choice Aggregation. Will the Project/Plan retain Peninsula Clean Energy as the energy provider and encourage occupants to opt for the 100% renewable energy option?	Consistent. Under proposed Policy NRC-5.4, the City would encourage and support the generation, transmission, use, and storage of renewable energy and continue its participation and support for PCE.	
Climate Action Plan (Measure 16)	Municipal Participation in Community Choice Aggregation. Will the Project/Plan participate in ECO100 (100% renewable) electricity service through PCE for municipal projects?	Consistent. Under proposed Policy NRC-5.4, the City would encourage and support the generation, transmission, use, and storage of renewable energy and continue its participation and support for Peninsula Clean Energy. This would include municipal projects. In addition, through proposed Policy NRC-5.7 the City must consider CALGreen Tier 1 energy performance, along with LEED Silver or Gold equivalent status for new municipal buildings to maximize energy efficiency.	
Climate Action Plan (Measure 10)	Residential Buildings Solar Requirement. Will the Project/Plan participate in bulk purchase program such as the Peninsula SunShares Program and include installation of a solar PV system at time of construction for residential new construction and remodels?	Consistent. Under proposed Policy NRC-5.4, the City would encourage and support the generation, transmission, use, and storage of renewable energy, including solar PV systems for residential buildings. In addition, implementation of Program G would have the City continue its public information campaign to encourage energy conservation through energy conservation and renewable energy programs, including the Small Residential Rooftop Solar Energy Systems Readiness Ordinance.	
Climate Action Plan (Measure 12)	Commercial Buildings Solar Requirement. Will the Project/Plan include installation of a solar PV system at time of construction for commercial new construction?	Consistent. Under proposed Policy NRC-5.4, the City would encourage and support the generation, transmission, use, and storage of renewable energy, including solar PV systems for commercial buildings.	
Climate Action Plan (Measure 18)	Municipal Buildings Solar Requirement. Will the Project/Plan include installation of a solar PV system at time of construction for municipal new construction and remodels?	Consistent. Under proposed Policy NRC-5.4, the City would encourage and support the generation, transmission, use, and storage of renewable energy, including solar PV systems for municipal buildings. In addition, through proposed Policy NRC-5.7, the City shall consider CALGreen Tier 1 energy performance, along with LEED Silver or Gold equivalent status for new municipal buildings to maximize energy efficiency, which could include the use of solar PV systems.	
Climate Action Plan (Measure 13)	All Project Types Pairing Battery Storage with Solar PV Systems. Will the Project/Plan provide education and outreach regarding the benefits of	Consistent. Under proposed Policy NRC-5.8, the City would continue to work with energy utilities and regional partners to educate residents and business owners about renewable energy and energy	

Regulation	Requirements	Consistency
	pairing battery storage with solar PV systems to related businesses, residents, and contractors?	efficiency, including available programs and incentives, and strategies to help residents and business owners reduce their energy demand and energy-related GHG emissions. This would include the benefits of pairing battery storage with solar PV systems.
Building Electrificatio	n	
Climate Action Plan (Measure 9)	Residential & Commercial All-Electric Ordinance. Will the Project/Plan include all-electric residential or commercial new construction and/or remodels, including for electric lighting, heating, cooking, and water heating?	Consistent. Through proposed Policy NRC-5.10, the City would encourage residential and commercial energy audits. Under proposed Policy NRC-5.6, as part of the City updating its Green Building Ordinance, it will consider updates for additional "reach code" mandatory requirements for new development, such as solar hot water systems or cool roofs that would potentially benefit from such programs. In addition, through Policy NRC-5.3 and 5.4, the City would support zero net energy use in buildings and the use of renewable energy.
Climate Action Plan (Measure 8)	All Project Types Electrical Panel Upgrades in Existing Buildings. Will the Project/Plan leverage incentives/resources by PCE, BayREN, and PG&E to upgrade existing residential and commercial buildings to be all-electric, including solar PV, battery storage, air source heat pumps, heat pump water heaters, electric dryers, electric stoves, and electric vehicles?	Consistent. Through proposed Policy NRC-5.9, the City would promote participation in residential energy efficiency programs, including BayREN's Home+ program, San Mateo County Energy Watch and PG&E's efficient appliance rebates. Through Policy NRC-5.10, the City shall encourage residential and commercial energy audits. Under proposed Policy NRC-5.6, as part of the City updating its Green Building Ordinance, it will consider updates for additional "reach code" mandatory requirements for new development, such as solar hot water systems or cool roofs that would potentially benefit from such programs. In addition, through proposed policies NRC-5.3 and 5.4, the City would support zero net energy use in buildings and the use of renewable energy. Finally, implementation of proposed Program G would have the City continue its public information campaign to encourage energy conservation through energy conservation and renewable energy Efficiency Programs, the PACE Program, and the Small Residential Rooftop Solar Energy Systems Readiness Ordinance.
Vehicle Electrification	n	
Climate Action Plan (Measure 31)	All Project Types EV Charging Infrastructure in Existing Buildings. Will the Project/Plan leverage incentives from PCE to include charging infrastructure at existing public properties, multi-unit dwellings, and workplaces?	Consistent. Under proposed Policy NRC-5.6, as part of the City updating its Green Building Ordinance, it will consider updates for additional "reach code" mandatory requirements for new development, which would include EV charging provisions. Under proposed Policy NRC-5.5, the City shall encourage and support expanding EV charging stations and the purchase of electric vehicles. In addition, with proposed Policy M-4.6, the City shall work with large employers to expand EV charging in existing buildings and within public parking areas to incentivize EV ownership.

Regulation	Requirements	Consistency
Climate Action Plan (Measure 32)	All Project Types EV Charging Infrastructure in New Construction. Will the Project/Plan comply with the most recent City Reach Code for residential and commercial buildings new construction related to provision of parking spaces designed to accommodate electric vehicle charging equipment and clean air vehicles (EVs, PHEVs)?	Consistent. Under proposed Policy NRC-5.6, as part of the City updating its Green Building Ordinance, it will consider updates for additional "reach code" mandatory requirements for new development, which would include EV charging provisions. Under proposed Policy NRC-5.5, the City shall encourage and support expanding EV charging stations and the purchase of electric vehicles. In addition, with proposed Policy M-4.6, the City shall work with large employers to expand EV charging in existing buildings and within public parking areas to incentivize EV ownership.
Transportation		
Alternative Transpor	tation	
Climate Action Plan (Measure 30)	All Project Types Shuttle Program. If not proximate to transit hubs or lines, will the Project/Plan connect to transit via shuttle service as requested by the City?	Consistent. Policy M-2.3 would have the City work with SamTrans to provide appropriate community- serving transit service and coordination of schedules and services with other transit agencies. Additional proposed 2040 General Plan policies to support this include Policy LU-3.7 to develop walkable neighborhoods; Policy M-1.1 to incorporate complete streets infrastructure; Policy M-1.2 to promote multimodal choices of transportation; and Policy M1.4 to create a comprehensive multimodal transportation system; support this measure through
Climate Action Plan (Measure 28)	All Project Types Bike Sharing. Will the Project/Plan accommodate shared bike service as requested by the City?	Consistent. Proposed Goal M-3 would have the City provide a robust and interconnected bicycle system to support this measure. Specific proposed policies include Policy M-3.1 to implement an Active Transportation Plan; Policy M-3.2 to develop a bikeways system; Policy M-3.5 to implement bicycle lanes on El Camino Real; Policy M-3.7 to ensure that projects provide appropriate bicycle facilities; and Policy M-3.11 to require bicycle parking on all land uses (except single-family housing).
Climate Action Plan (Measure 33)	All Project Types Shared Electric Bikes and Scooters. Will the Project/Plan modify existing infrastructure to accommodate shared electric bikes and scooters via provision of dedicated off- street parking spaces and on-street corrals as requested by the City?	Consistent. Through proposed Policy M-3.12, the City would modify existing city infrastructure to accommodate shared bicycles, electric bikes and scooters that provide last-mile solutions to residents and commuters. Infrastructure enhancements include dedicated off-street parking spaces and on- street corrals to accommodate shared electric bike and scooter parking and prevent conflicts with pedestrians.
Active Transportation	n	
Climate Action Plan (Measure 24)	All Project Types Walkable/Bikeable Street Landscape. Will the Project/Plan design the urban landscape to make walking and biking more desirable, including via provision of bike lanes, bike parking, traffic calming, beautification, etc.?	Consistent. Proposed Goal M-3 would have the City provide a robust and interconnected bicycle and pedestrian system to support this measure. Proposed specific policies include Policy M-3.1 to implement an Active Transportation Plan; Policy M-3.2 to develop a bikeways system; Policy M-3.5 to implement bicycle lanes on El Camino Real; Policy M-3.7 to ensure that projects provide appropriate bicycle facilities; and

Regulation	Requirements	Consistency	
		Policy M-3.11 to require bicycle parking on all land uses (except single-family housing).	
Commuting & Vehicle	e Sharing		
Climate Action Plan (Measure 35)	Municipal Employee Commuting Program. Will the Project/Plan promote and incentivize public transportation, carpooling, biking, etc. for municipal new construction and remodels?	Consistent. The 2040 General Plan would implement several policies to reduce vehicle trips by City employees. Proposed Policy NRC-7.1 would promote reduced idling, trip reduction, routing for efficiency, and the use of public transportation, carpooling, telecommuting, alternative scheduling, and alternate modes of transportation for operating City departments and City employees, and Policy NRC-7.2 would have the City purchase zero-emission vehicles.	
Climate Action Plan (Measure 29)	All Project Types Car Sharing. Will the Project/Plan open a car sharing station or provide car sharing parking as requested by the City?	Consistent. Through proposed Policy M-5.4, the City would explore opportunities to partner with car sharing companies to establish designated car sharing spaces and vehicles in the City, and permit them to occupy any required parking spaces on private property provided the cars are made available to the general public.	
Waste			
Materials Recycling &	& Composting		
Climate Action Plan (Measure 37)	Residential & Commercial Landfill Diversion Rate Goal. Will the Project/Plan meet current legislation to recycle, and increase participation in recycling programs and weekly collection of recyclables and organic waste to achieve 85 percent diversion from landfill?	Consistent. Through proposed Policy NRC-6.1, the City would encourage increased community participation in recycling and composting programs and weekly collection of recyclables and organic waste to achieve 85 percent diversion by 2030, and 95 percent diversion for municipal operations by 2030. In addition, the City would implement Policy NRC-6.3, which would have the City continue to implement the AB 939 Integrated Waste Management Plan to meet the waste diversion requirements of the California Integrated Waste Management Act (AB 939) and related legislation.	
Climate Action Plan (Measure 39)	Commercial Organics Recycling Ordinance. Will the Project/Plan require that all businesses and multi- family complexes with more than five units to sort and recycle organic material in order to comply with AB 1826?	Consistent. Through proposed Policy NRC-6.9, the City would require all new development to comply with Chapter 6.45 Regulating Mandatory Organic Waste Disposal Reduction and (2) Section 2.20.150 to Chapter 2.20 Purchasing System, regarding procurement of recovered organic waste products to comply with Senate Bill 1383, California's Short-Lived Climate Pollutants Reduction Act (2016).	
Climate Action Plan (Measure 42)	Municipal Zero Waste Policy. Will the Project/Plan implement on-site methods to achieve 95 percent waste diversion from landfills?	Consistent. Through proposed policies NRC-6.1 and 6.2, the City would encourage increased community participation in recycling and composting programs and weekly collection of recyclables and organic waste to achieve 85 percent diversion by 2030, and 95 percent diversion for municipal operations by 2030, and shall continue to require all developments to comply with the current CALGreen requirements for construction and demolition waste diversion.	

Regulation	Requirements	Consistency
Green Materials		
Climate Action Plan (Measure 40)	Municipal Environmentally Preferred Purchasing Policy. Will the Project/Plan implement sustainable purchasing policy to reduce energy and waste, conserve water, and increase recycling?	Consistent. Through proposed Policy NRC-6.4, the City would prioritize products that are made with postconsumer recycled content; are recyclable, compostable, or reusable; are less toxic than conventional goods; are manufactured locally; and are fairly traded.
Climate Action Plan (Measure 38)	All Project Types Sustainable Food Service Ware. Will the Project/Plan comply with the most recent Sustainable Food Service Ware ordinance to require that all food ware is compostable and to reduce the use of other single-use items in food services?	Consistent. Through proposed Policy NRC-6.5, the City would continue to implement the Sustainable Food Service Ware Ordinance (adopted in 2007) and the Single-Use Carryout Bag Ordinance (adopted in 2012) to divert and reduce solid waste and single-use plastics.
Climate Action Plan (Measure 41)	Municipal Sustainable Vendor Policy for Events. Will the Project/Plan include a plan to work with event organizers for recycling cardboard, paper, containers and food/organics at public events, and for using compostable/recyclable food service ware?	Consistent. Through proposed Policy NRC-6.5, the City would continue to implement the Sustainable Food Service Ware Ordinance (adopted in 2007) and the Single-Use Carryout Bag Ordinance (adopted in 2012) to divert and reduce solid waste and single-use plastics.
Water		
Water Use Efficiency		
Climate Action Plan (Measure 5)	Residential Energy/Water Conservation Program. Will the Project/Plan meet minimum water- efficiency standards?	Consistent. Goal NRC-3 focuses on water conservation, including for residential development. This includes Policy NRC-3.1, which requires water conservation in existing and new development consistent with the Urban Water Management Plan (UWMP); Policy NRC-3.2, which requires indoor waste use conservation in accordance with CALGreer standards; Policy NRC-3.3, which requires water efficient landscaping for new landscapes; Policy NRC- 3.4, which encourages the use of recycled water; and Policy NRC-3.5, which has the City conducting water efficiency education.
Climate Action Plan (Measure 6)	Commercial Energy/Water Conservation Program. Will the Project/Plan meet minimum water- efficiency standards?	Consistent. Goal NRC-3 focuses on water conservation, including for commercial development This includes Policy NRC-3.1, which requires water conservation in existing and new development consistent with the UWMP; Policy NRC-3.2, which requires indoor waste use conservation in accordance with CALGreen standards; Policy NRC- 3.3, which requires water efficient landscaping for new landscapes; Policy NRC-3.4, which encourages the use of recycled water; and Policy NRC-3.5, which has the City conducting water efficiency education.
Climate Action Plan (Measure 20)	All Project Types Water Conservation Incentives. Will the Project/Plan install and maintain water-efficient appliances and fixtures?	Consistent. Through Policies NRC-3.1 and 3.2, the plan would install and maintain water-efficient appliances and fixtures in accordance with the UWMP and CALGreen.

Regulation	Requirements	Consistency
Climate Action Plan (Measure 21)	All Project Types Water Efficient Landscape Ordinance and Indoor Water Efficiency Requirements. Will the Project/Plan implement the State Model Water Efficient Landscape Ordinance (MWELO) and CALGreen indoor water efficiency requirements?	Consistent. Through Policy NRC-3.3, the City shall continue to require that new or retrofitted landscapes comply with the current MWELO.
Water Recycling		
Climate Action Plan (Measure 22)	All Project Types "Graywater Ready". Will the Project/Plan include development that is built "graywater ready" for new construction?	Consistent. Through Policy NRC-3.4, the City shall encourage the use of recycled water for parks and private landscapes when available, and encourage greywater ready construction.
Overall Sustainability		
Green Businesses		
Climate Action Plan (Measure 43)	Commercial & Municipal Green Business Program. Will the Project/Plan apply to be a certified Bay Area Green Business and implement respective sustainable practices?	Consistent. Through Policy NRC-6.7, the City shall continue to participate in the Bay Area Green Business Program that allows businesses to brand themselves as green by following sustainable practices.
Sources: Millbrae, City of.	2021. Millbrae 2020 CAP and Millbrae CEQA GH	IG Checklist.

As shown in Table 3.6-6, the 2040 General Plan would be consistent with Millbrae 2020 CAP measures. In addition to the goals and policies described above for 2020 CAP consistency, the 2040 General Plan also includes a catch all measure to ensure 2020 CAP consistency with Policy NRC-7.3, which states that the City shall require all new development to comply with relevant Climate Action Plan strategies and measures.

Through consistency with the 2020 CAP, the 2040 General Plan meets the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and makes substantial progress to carbon neutrality by 2045; however, it would not meet the carbon neutrality goal. Specifically, the 2020 CAP states that *"the City will meet the 2030 GHG target emissions reductions and is on a trajectory to meet carbon neutrality by 2045. The City expects that the future update to this CAP will outline how the City will meet carbon neutrality by 2045."* While the 2020 CAP makes substantial progress to the goal of carbon neutrality by 2045 through its policies, it does not outline how the City would meet the goal. The 2040 General Plan would, therefore, not be consistent with the BAAQMD CEQA thresholds for GHG emissions, as the local GHG reduction strategy does not meet this goal. In addition, it is possible that future projects may not be consistent with all CAP measures, and thus would need to prepare a quantitative GHG assessment. However, Millbrae does not currently have quantitative CEQA GHG thresholds for use in assessing GHG emissions. Therefore, impacts related to 2040 General Plan generation of GHG emissions and consistency with the Millbrae 2020 CAP would be potentially significant.

2040 General Plan Consistency with State GHG Reduction Plans

The 2040 General Plan is a policy-level document that guides land use and development throughout the City. The CARB 2017 Climate Change Scoping Plan outlines a pathway to achieving the 2030 reduction targets set under California Senate Bill 32, which are considered interim targets toward meeting the long-term 2045 carbon neutrality goal established by California Executive Order B-55-18. While the 2040 General Plan would facilitate additional development within the City, building

energy consumption and VMT (and thus air pollution), water consumption, and solid waste generation per capita would be reduced under the 2040 General Plan buildout compared to existing conditions and in compliance with the Millbrae CAP. However, the while the 2020 CAP makes substantial progress to the goal of carbon neutrality by 2045 through its policies, it does not outline how the City with meet the goal. The 2040 General Plan would therefore not be consistent with the California Executive Order B-55-18 goal of carbon neutrality by 2045. Therefore, impacts related to 2040 General Plan generation of GHG emissions and consistency with State GHG reduction plans would be potentially significant.

SPECIFIC PLAN

Development facilitated by the Specific Plan would result in GHG emissions during operation. GHG emissions during operation would result primarily from building energy usage and fuel consumption associated with light-duty vehicles. The Specific Plan contains policies that aim to reduce GHG emissions in accordance with State 2030 GHG emissions reductions goals and provide substantial progress to the State's goal of carbon neutrality by 2045. Proposed Specific Plan policies related to GHG emissions include:

- Goal LU Cultivate a pedestrian oriented, mixed-use environment in the downtown and along El Camino Real that supports vibrant commercial activity, maximizes transit use, enhances quality of life, and is well-scaled with surrounding neighborhoods
 - Policy LU-1Infill Development. The City shall support high quality infill development that
provides a rich mix of businesses, housing types, and community-serving uses
and encourage public transit, walking, and biking.
 - Policy LU-2Mixed-use Development. The City shall encourage vertical mixed-use
development with active ground floor uses, and residential and office uses on
the upper floors.
 - Policy LU-3El Camino Real. The City shall prioritize higher density and intensity
development along El Camino Real and establish a multimodal complete
street, lined with a diverse mix of uses that are context sensitive and includes
an attractive streetscape design that creates an inviting pedestrian
environment and a positive city image.
 - Policy LU-4Downtown. The City shall encourage a mix of small- scale, infill development
with community gathering places that serves residents and attracts more
pedestrian traffic, while enhancing the charming character of downtown.
- Goal CP Provide a safe and well connected circulation network that promotes transportation mode choices, reduces vehicle traffic, and promotes healthy lifestyles.
 - Policy CP-11 Pedestrian Crossings. The City shall work with Caltrans to implement the Streetscape Plan and improve pedestrian crossings on El Camino Real to increase the predictability and visibility of pedestrians by providing complete sidewalk coverage, signal controlled crosswalks, minimizing the intersection footprint, reducing pedestrian crossing distances, shortening traffic signal cycle lengths, and using high-visibility treatments. These improvements shall

focus on the intersection crossings along El Camino Real, and at Millbrae Avenue and the U.S. Highway 101 onramps.

- Policy CP-12 Bicycle Lanes on El Camino Real. The City shall work with Caltrans to add separated bicycle lanes on El Camino Real to increase cyclist safety, enhance connectivity, reduce automobile reliance, and encourage active lifestyle choices.
- Policy CP-13 Bicycle Route Alternatives to El Camino Real. The City shall add and maintain bicycle routes along Magnolia Avenue and Hemlock Avenue to provide lower volume and lower speed route alternatives to El Camino Real.
- Policy CP-14Bicycle Parking. The City shall require new development to provide safe and
secure bicycle parking facilities, such as bike lockers, bike storage rooms at
ground level, and bike racks that allow for proper two-point locking.
- Policy CP-15Bus Stops. The City shall work with partner agencies to encourage
improvements to bus stops and addition of amenities along El Camino Real
(e.g., shelters, trash receptacles, Wi-Fi) that encourage transit use, contribute
to sense of place, and improve the public realm.
- **Policy CP-16 Micro-mobility**. The City shall provide micro-mobility options such as bike and scooter shares, and design the streetscape and public plazas to accommodate docking stations, bike parking, etc.
- **Policy CP-17** Widened Sidewalk and Multi-use Curb Lane on El Camino Real. The City shall incorporate elements along El Camino Real that provide multi-use curb lanes which accommodate a variety of curb uses such as on-street parking, ride-share pick-up/drop-off, loading, parklets, micro-mobility docking stations, etc.
- Goal OS Establish a pedestrian oriented public realm that includes a network of public open spaces that are connected by safe pedestrian paths.
 - Policy OS-1 Pedestrian-oriented Public Realm. The City shall enhance the public realm to promote an engaging, safe, and comfortable pedestrian experience. Improvements should include the addition of plazas, parklets, outdoor seating, consistent street planting and other landscape elements, wide sidewalks, sidewalk furniture, and public art.
 - Policy OS-2 Network of Public Open Spaces. The City shall provide a network of public open spaces, including outdoor plazas, parks, and parklets, that is connected by pedestrian walkways and paths.
 - Policy OS-3Sustainable Open Space and Parks. The City shall require open spaces and
parks to incorporate sustainability measures, such as including native plant
species and drought tolerant plants that require minimal irrigation,
permeable paving, solar-powered lighting, and other similar features.

Specific Plan Consistency with Millbrae 2020 CAP

As stated above in *Specific Thresholds of Significance*, the two options for plan consistency with BAAQMD GHG thresholds includes meeting the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045, or being consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b). To

determine consistency with the 2020 Millbrae CAP, a local GHG reduction strategy that meets CEQA Guidelines criteria, Table 3.6-6 provides the Specific Plan's consistency with the 2020 CAP. As the Specific Plan would implement applicable 2040 General Plan policies, the analysis in Table 3.6-5 also applies to the Specific Plan. Therefore, Table 3.6-6 focuses on Millbrae 2020 CAP measures that are applicable to the Specific Plan.

Regulation	Requirements	Consistency
Land Use		
Smart Growth		
Climate Action Plan (Measure 23)	All Project Types Smart Growth. Will the Project/Plan include infill, transportation-oriented, and/or mixed-use development that meets or exceeds the maximum density allowed under the existing zoning and General Plan land use designation?	Consistent. Proposed Policy LU-1 would support high- quality infill development that provides a rich mix of businesses, housing types, and community-serving uses and encourage public transit, walking, and biking in the Specific Plan area. In addition, Policy LU-2 would encourage vertical mixed-use development with active ground floor uses, and residential and office uses on the upper floors in the Specific Plan area.
Transportation		
Alternative Transport	ation	
Climate Action Plan (Measure 28)	All Project Types Bike Sharing. Will the Project/Plan accommodate shared bike service as requested by the City?	Consistent. Under proposed Policy CP-16, within the Specific Plan area the City would provide micro-mobility options such as bike and scooter shares, and design the streetscape and public plazas to accommodate docking stations, bike parking, etc.
Climate Action Plan (Measure 33)	All Project Types Shared Electric Bikes and Scooters. Will the Project/Plan modify existing infrastructure to accommodate shared electric bikes and scooters via provision of dedicated off-street parking spaces and on-street corrals as requested by the City?	Consistent. Under proposed Policy CP-16, within the Specific Plan area the City would provide micro-mobility options such as bike and scooter shares, and design the streetscape and public plazas to accommodate docking stations, bike parking, etc.
Active Transportation	L Contraction of the second	
Climate Action Plan (Measure 24)	All Project Types Walkable/Bikeable Street Landscape. Will the Project/Plan design the urban landscape to make walking and biking more desirable, including via provision of bike lanes, bike parking, traffic calming, beautification, etc.?	Consistent. The Specific Plan contains many policies to make the area more bicycle and pedestrian friendly. Proposed Policy CP-9 would increase accessibility for persons with disabilities; Policy CP-11 would improve pedestrian crossings; Policy CP-12 would implement separated bicycle lanes on El Camino Real; Policy CP-12 would add and maintain bicycle route alternatives to E Camino Real; Policy CP-14 would provide safe and secure bicycle parking facilities; Policy CP-16 would provide micro-mobility options; and Policy CP-17 would widen the sidewalk and multi-use curb lane on El Camino Real.

Table 3.6-6	Millbrae 2020 Climate Action Plan Consistency	– Specific Plan

As shown in Table 3.6-5 and Table 3.6-6, the Specific Plan would be consistent with Millbrae 2020 CAP measures. Through consistency with the 2020 CAP, the Specific Plan meets the State's goals to reduce emissions to 40 percent below 1990 levels by 2030 and makes substantial progress to carbon

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

neutrality by 2045; however, it would not meet the carbon neutrality goal. Specifically, the 2020 CAP states that *"the City will meet the 2030 GHG target emissions reductions and is on a trajectory to meet carbon neutrality by 2045. The City expects that the future update to this CAP will outline how the City will meet carbon neutrality by 2045."* While the 2020 CAP makes substantial progress to the goal of carbon neutrality by 2045 through its policies, it does not outline how the City will meet the goal. The Specific Plan would, therefore, not be consistent with the BAAQMD CEQA thresholds for GHG emissions as the local GHG reduction strategy does not meet this goal. In addition, it is possible that future projects may not be consistent with all CAP measures, and thus would need to prepare a quantitative GHG assessment. However, Millbrae does not currently have quantitative CEQA GHG thresholds for use in assessing GHG emissions. Therefore, impacts related to Specific Plan generation of GHG emissions and consistency with the Millbrae 2020 CAP would be potentially significant.

Specific Plan Consistency with State GHG Reduction Plans

The Specific Plan is a policy-level document that guides land use and development in the Specific Plan area. The CARB 2017 Climate Change Scoping Plan outlines a pathway to achieving the 2030 reduction targets set under California Senate Bill 32, which are considered interim targets toward meeting the long-term 2045 carbon neutrality goal established by California Executive Order B-55-18. While the Specific Plan would facilitate additional development within the City, building energy consumption and vehicle miles traveled (VMT) (and thus air pollution), water consumption, and solid waste generation per capita would be reduced under the Specific Plan buildout compared to existing conditions and in compliance with the Millbrae 2020 CAP. However, while the 2020 CAP makes substantial progress to the goal of carbon neutrality by 2045 through its policies, it does not outline how the City will meet the goal. The Specific Plan would, therefore, not be consistent with the California Executive Order B-55-18 goal of carbon neutrality by 2045. Therefore, impacts related to Specific Plan generation of GHG emissions and consistency with State GHG reduction plans would be potentially significant.

Overall

Implementation of Mitigation Measures GHG-1 and GHG-2 would provide Millbrae with CEQA GHG emissions thresholds and update the Millbrae 2020 CAP to establish a Citywide GHG reduction target and provide an outline of how Millbrae will meet the State goal of carbon neutrality by 2045. Until the CEQA GHG thresholds are adopted and the CAP is updated, implementation of the 2040 General Plan and Specific Plan would not be consistent with BAAQMD GHG thresholds nor be consistent with State GHG reduction plans. Therefore, overall 2040 General Plan and Specific Plan impacts related to GHG emissions are significant and unavoidable.

Mitigation Measures

MITIGATION MEASURE GHG-1: ADOPT AND IMPLEMENT A CEQA GHG EMISSIONS THRESHOLD

The City shall include and implement a new 2040 General Plan policy under the Natural Resource Element to prepare, adopt, and implement a CEQA GHG Emissions threshold of significance. The City shall adopt the CEQA GHG Emissions threshold of significance by Spring 2023 for use in future CEQA GHG emissions analyses through 2030 consistent with the timeframe of the Millbrae 2020 CAP. In addition, upon completion of future CAP updates and as necessary, the City shall update the CEQA GHG Emissions threshold of significance and Millbrae CEQA GHG Checklist to be consistent with each CAP update.

MITIGATION MEASURE GHG-2: UPDATE MILLBRAE 2020 CAP TO MEET CARBON NEUTRALITY BY 2045

The City shall update the Millbrae 2020 CAP by Spring 2024 to outline how Millbrae will meet the State goal of carbon neutrality by 2045. Implementation measures in the updated CAP to achieve the 2045 goal may include, but are not limited to, the following:

- Develop and adopt Zero Net Energy requirements for new and remodeled residential and nonresidential development;
- Develop and adopt a building electrification ordinance for existing and proposed structures;
- Expand charging infrastructure and parking for electric vehicles;
- Implement carbon sequestration by expanding the urban forest, participating in soil-based or compost application sequestration initiatives, supporting regional open space protection, and/or incentivizing rooftop gardens; and
- Implement policies and measures included in the California 2017 Climate Change Scoping Plan, such as mobile source strategies for increasing clean transit options and zero emissions vehicles by providing electric vehicle charging stations.

Level of Significance

Significant and unavoidable

Effects of Energy Consumption

Significance Criterion c: Would the proposed plans result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact GHG-2 THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD RESULT IN AN INCREASE OF OVERALL CONSUMPTION OF ENERGY BUT ARE BASED ON A LAND-USE STRATEGY AND CONTAIN POLICIES THAT WOULD PROMOTE GREATER OVERALL ENERGY EFFICIENCY. WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY WOULD NOT OCCUR. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

Development facilitated by the 2040 General Plan and Specific Plan would involve the use of energy during construction. Energy use during construction would be primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. Temporary grid power may also be provided to construction trailers or electric construction equipment. Development facilitated by the 2040 General Plan and Specific Plan would utilize construction contractors that comply with applicable CARB regulations such as accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment, and restricted idling of heavy-duty diesel motor vehicles. Construction contractors are required to comply with the provisions of CCR Title 13, sections 2449 and 2485, prohibiting diesel-fueled commercial and off-road vehicles from idling for more than five minutes, minimizing unnecessary fuel consumption. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would minimize inefficient fuel consumption. These construction equipment standards (i.e., Tier 4 efficiency requirements) are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068. Electrical power would be consumed during demolition and

construction activities, and the demand, to the extent required, would be supplied from existing electrical infrastructure in the area.

Overall, demolition and construction activities would not have any adverse impact on available electricity supplies or infrastructure. Demolition and construction activities would utilize fuel-efficient equipment consistent with State and federal regulations and would comply with state measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. Per applicable regulatory requirements of CALGreen, development facilitated by the 2040 General Plan and Specific Plan would comply with construction waste management practices to divert construction and demolition debris from landfills. These practices would result in efficient use of energy by construction facilitated by the project.

Furthermore, in the interest of cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary. The 2040 General Plan and Specific Plan is a response to economic demand for more housing and retail uses that, if not fulfilled by the project, would likely result in new construction elsewhere, with associated increased in commuter VMT. The energy used to construct the project is necessary because the project is intended to meet these demands. Therefore, 2040 General Plan and Specific Plan demolition and construction activities would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and construction energy impacts would be less than significant.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Development facilitated by the 2040 General Plan would involve the use of energy during operation. Long-term operation of development projects would require permanent grid connections for electricity and natural gas service to power internal and exterior building lighting, and heating and cooling systems. Daily operation of the regional transportation system uses energy in the form of fuel consumed by propulsion of passenger vehicles, including automobiles, vans and trucks, and transit vehicles, including buses and trains. Increases in motor vehicle trips are primarily a combined function of population and employment growth. The 2040 General Plan emphasizes reducing VMT on area roadways through emphasizing greater residential density, proximity of residents to jobs, and the support of alternative methods of transportation. The 2040 General Plan policies that support a VMT reduction, and thus a reduction in energy usage from fuel, include the policies listed below as well as Policies LU-2.3 (Housing Near Jobs), LU-7.4 (High Density, Mixed-Use Development), M-1.1 (Serving All Users), M-1.2 (Multimodal Choices), M-1.4 (Accessibility and Connectivity), M-2.1 (Caltrain and BART), M-2.2 (California High Speed Rail), M-2.3 (Bus and Shuttle Service), M-3.1 (Active Transportation Plan), M-3.2 (Bikeways System), M-3.3 (Trail Access), M-3.4 (Bay Trail), M-3.5 (Bicycle Lanes on El Camino Real), M-3.7 (Bicycle and Pedestrian Facilities), M-3.11 (Bicycle Parking), M-4.6 (Electric Vehicle Charging Stations), M-4.9 (Clean Air Vehicle Parking), M-5.1 (Countywide TDM Programs Participation), M-5.3 (Bay Area Commuter Benefits Program), M-5.4 (Car Sharing), M-5.5 (Electric Transportation Network Company Vehicles), HSHM-1.3 (Physical Activity and Built Environment), NRC-7.1 (City Trip Reduction), and NRC-7.2 (City Vehicle Replacement) listed with further detail under Impact GHG-1:

Policy LU-1.2Land Uses that Maximize Transit. The City shall encourage higher-intensity
development around the Millbrae Station and along the El Camino Real
corridor that maximizes transit use.

- **Policy LU-2.2 Maximize Mixed-Use Residential Density.** The City shall encourage mixed-use projects and maximize the allowable density of the residential portion.
- Policy LU-7.6 Class A Office Space. The City shall encourage Class A office development in the Station Area to take advantage of proximity to the Millbrae Station, U.S. Highway 101, and new residential development. The City shall encourage developers to employ state-of-the-art design techniques to maximize space, flexibility, and functionality.
- **Policy M-1.15 Transportation Studies for New Development.** The City shall require new development projects to perform site-specific transportation studies based on City implementation standards (including access, circulation, parking, and safety for all transportation modes) to identify and implement transportation-related improvements (and/or a fair share contribution via the payment of the applicable required Development Impact Fees for transportation and mobility) to maintain acceptable level of service standards, VMT thresholds, safe access for all modes, and acceptable traffic operations at project access points consistent with Policy M-1.12.
- **Policy M-4.10 Bicycle Parking.** The City shall require short- and long-term bicycle parking for new development on all land uses, except for single-family dwellings.
 - **Program B** Active Transportation Plan. The City shall update the Active Transportation Plan every five years to accomplish the following: Assess the needs of pedestrians and cyclists in Millbrae; identify improvements to infrastructure and programs; ensure eligibility to certain transportation funding sources; and to coordinate pedestrian and bicycle local actions and regional projects.

The Specific Plan also emphasizes reducing VMT on area roadways through emphasizing greater residential density, proximity of residents to jobs, and the support of alternative methods of transportation. The Specific Plan measures that support a VMT reduction, and thus a reduction in energy usage from fuel, include Policies LU-1 (Infill Development), LU-2 (Mixed-Use Development), LU-3 (El Camino Real), LU-4 (Downtown), CP-11 (Pedestrian Crossings), CP-12 (Bicycle Lanes on El Camino Real), CP-13 (Bicycle Route Alternatives to El Camino Real), CP-14 (Bicycle Parking), CP-15 (Bus Stops), CP-16 (Micro-mobility), CP-17 (Widened Sidewalk and Multi-use Curb Lane on El Camino Real), OS-1 (Pedestrian-oriented Public Realm), and OS-2 (Network of Public Open Spaces(listed with further detail above under Impact GHG-1.

Table 3.6-7 shows daily VMT, estimated fuel consumption, and fuel consumption per service population in Millbrae and the Specific Plan area under 2019 conditions and future 2040 conditions with implementation of the 2040 General Plan. As shown therein, daily fuel consumption per service population would remain largely the same under the 2040 General Plan and would be reduced by approximately 17 percent under the Specific Plan.

Plan	Year	Service Population	Daily VMT	Daily Fuel Consumption (gallons)	Daily Fuel Consumption Per Service Population (gallons)
2040	2019	29,774	841,623	43,598	1.46
General Plan	2040	44,286	1,257,516	65,142	1.47
Specific	2019	3,455	215,636	11,170	3.23
Plan	2040	5,956	307,156	15,911	2.67

	Table 3.6-7	Direct Transportation Energy Use in Millbrae
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Operation of the development facilitated by the 2040 General Plan and Specific Plan would consume natural gas and electricity for building heating and power, lighting, and water conveyance, among other operational requirements. The 2040 General Plan and Specific Plan contains goals, policies, and implementation programs that would help minimize the occurrence of inefficient, wasteful, and unnecessary energy consumption during construction and operation of development facilitated by the General Plan. The 2040 General Plan goals, policies, and implementation programs that would result in reduced energy consumption include Policies HSHM-3.6 (Sustainable Building and Site Design Practices), NRC-5.2 (Reduce Heat Island Effect, (Zero Net Energy), NRC-5.4 (Renewable Energy), NRC-5.5 (Electric Vehicles), NRC-5.6 (Green Building Ordinance), NRC-5.7 (Energy Efficient Municipal Buildings), NRC-5.8 (Energy Efficiency Education), NRC-5.9 (Residential Energy Retrofit Incentives and Rebates), and NRC-5.10 (Energy Audits) and Programs C (Green Infrastructure Plan), D (Energy Conservation Ordinance), E (Streetlight Retrofit), F (City Building Audits and Reports), G (Energy Information and Outreach), and L (Climate Action Plan) as listed in further detail above Impact GHG-1.

In addition to the above policies and implementation programs, the 2040 General Plan and Specific Plan encourage infill and transit-oriented development to reduce overall energy consumption and result in greater energy efficiency throughout the City. For example, the 2040 General Plan and Specific Plan contains land-use strategies to encourage higher-density and mixed-use development adjacent to the Intermodal Station, along transit corridors, and near job centers. Mixed-use, transitoriented, and higher-density development improve energy efficiency as it places City residents closer to places of employment, businesses those residents patronize, and public transit facilities. By placing services and amenities close to where people live and work, the land use scenario envisioned by the 2040 General Plan and Specific Plan would minimize the need to drive and reduce per capita energy consumption and greenhouse gases.

Implementation of the 2040 General Plan and Specific Plan policies and programs listed above, as well as other policies and implementation programs contained in the 2040 General Plan and Specific Plan that would result in indirect energy conservation, such as the promotion of alternative transportation, water conservation, and waste reduction, would promote greater energy efficiency in municipal and community operations and development. Furthermore, the 2040 General Plan and Specific Plan contains a land-use strategy that actively promotes infill mixed-use and transitoriented development, which would result greater energy efficiency overall for City residents, businesses, and City operations. Therefore, operation of the 2040 General Plan and Specific Plan would not result in potentially significant environmental effects from wasteful, inefficient, or unnecessary consumption of energy, and operational energy impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Energy Efficiency or Renewable Energy Standards Consistency

Significance Criterion d: Would the proposed plans conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Impact GHG-3 THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD BE CONSISTENT WITH APPLICABLE ENERGY EFFICIENCY GOALS AND REGULATIONS, INCLUDING RELEVANT PROVISIONS OF CALGREEN AND CALIFORNIA ENERGY CODE TITLE 24. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Policy consistency is limited to operational energy use discussion. No 2040 General Plan or Specific Plan construction impact related to consistency with an applicable plan or regulation related to renewable energy or energy efficiency would occur.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Relevant plans and policies that aim to increase energy efficiency and the production of renewable energy include SB 100, the 2019 California Green Building Standards Code (CALGreen or Title 24 Part 11), and the 2019 California Building Energy Efficiency Standards (Title 24 Part 6). SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program and requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. CALGreen (Title 24 Part 11) institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. In addition, the California Building Energy Efficiency Standards (Title 24 Part 6) establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. CCR Title 24 (Parts 6 and 11) is updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. New construction and major renovations must demonstrate their compliance with the current Building Energy Efficiency Standards through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC.

Millbrae is part of the PCE community choice aggregate, which provides electricity primarily from clean, renewable sources. Millbrae would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by PCE continues to increase to comply with State requirements through SB 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. The 2040 General Plan includes policies to reduce energy use and increase production of renewable energy, as discussed further below, and would therefore align with the overall intent of SB 100.

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In addition, the City of Millbrae has adopted CALGreen (Title 24 Part 11) and the California Building Energy Efficiency Standards (Title 24 Part 6) pursuant to Millbrae Municipal Code Title 9.³³ Therefore, construction and operation associated with infrastructure projects stemming from the 2040 General Plan and Specific Plan would be designed to comply with the energy source standards of the CALGreen and the California Building Energy Efficiency Standards. Future projects would be required to demonstrate compliance with the CALGreen and the California Building Energy Efficiency Standards by implementing sustainability and energy efficiency measures such as highefficiency lighting and HVAC systems, low-flow water fixtures, dual-paned windows, and water efficient landscaping and irrigation systems. Compliance with these regulations would minimize potential conflicts with adopted energy conservation plans

Proposed 2040 General Plan NRC policies seek to decrease natural gas and energy consumption in new and existing buildings by requiring electrification, incentivizing energy-efficient retrofits, and encouraging LEED-certified development as well as encourage the production and storage of local renewable energy. These actions are consistent with the goals and policies established by SB 100, CALGreen, and the California Building Energy Efficiency Standards. Thus, the 2040 General Plan and Specific Plan would not conflict with adopted renewable energy or energy conservation plans, and impacts related to consistency with State and local renewable energy and energy efficiency plans would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

3.6.5 Cumulative Impacts

GHG emissions and global climate change represent cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the GHG emissions from past, present, and future projects and activities have contributed, currently are contributing, and would contribute to global climate change and its associated environmental impacts. And the geographic scope of the cumulative energy analysis is the PCE and PG&E service areas. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Impact Analysis*) located in Millbrae, Burlingame, South San Francisco, and at the San Francisco International Airport in addition to the proposed plans.

GHG Emissions

Cumulative development would generate GHG emissions from vehicle trips, electrical and water use, and other sources. The analysis of GHG emissions is cumulative in nature, as emissions affect the accumulation of GHGs in Earth's atmosphere. Projects that fall below thresholds are considered to have a less than significant impact, both individually and cumulatively. As indicated under Impact GHG-1, the proposed plans would have a significant and unavoidable impact related to GHG

³³ Pleasanton, City of. 2021. Pleasanton Municipal Code Chapter 20.26. Available: http://qcode.us/codes/pleasanton/view.php?topic=20-20_26&frames=on. Accessed October 13, 2021.

emissions and conflicts with GHG reduction plans, because the Millbrae 2020 CAP only has policies to provide substantial progress towards the State's goal of carbon neutrality by 2045 and does not have policies to meet the goal. Implementation of Mitigation Measures GHG-1 and GHG-2 would reduce GHG emissions through updating the 2020 CAP to include a GHG emissions threshold and goals to meet the State's goal of carbon neutrality by 2045. For development that would occur with the absence of an updated CAP, implementation of the 2040 General Plan and Specific Plan would only have policies that provide substantial progress towards the State's goal of carbon neutrality by 2045 and would, therefore, not meet the goal. Until the CAP is updated, implementation of the 2040 General Plan and Specific Plan would not be consistent with BAAQMD GHG thresholds. As such, impacts from the 2040 General Plan and Specific Plan and Specific Plan would represent a cumulatively considerable impact related to GHG emissions. Therefore, the cumulative impact related to GHG emissions would be significant and unavoidable.

Energy

Cumulative development would increase demand for energy resources. However, new iterations of the California Building Energy Efficiency Standards and CALGreen would require increasingly more efficient appliances and building materials that reduce energy consumption in new development. In addition, vehicle fuel efficiency is anticipated to continue improving through implementation of the existing Pavley Bill regulations under AB 1493. Nevertheless, the combined increase in energy consumption from cumulative projects would potentially result in a significant cumulative impact related to the wasteful, inefficient, and unnecessary consumption of energy resources. It is conservatively assumed, therefore, that cumulative development could result in a significant impact related to the wasteful, inefficient, or unnecessary consumption of energy resources. As described under Impact GHG-2, 2040 General Plan and Specific Plan development would be constructed in accordance with the California Building Energy Efficiency Standards and CALGreen. Policies would emphasize alternative means of transportation, such as bicycles and walking, and would provide development in close proximity to transit stations. Additionally, infill development may lower VMT due to the proximity to office and commercial uses. Therefore, as the 2040 General Plan and Specific Plan would not result in a wasteful, inefficient, or unnecessary consumption of energy, their contribution to a significant cumulative energy impact is not cumulatively considerable. Plans and projects throughout the State are required to adhere to applicable renewable energy and energy efficiency laws, programs, and policies such as California's RPS, AB 1493, and Title 24 standards. Therefore, the cumulative impact would be less than significant. As discussed under Impact GHG-3, 2040 General Plan and Specific Plan development would be consistent with the energy-related goals and policies of the Statewide plans and regulations; therefore, the proposed plans would not make a cumulatively considerable contribution to a significant cumulative impact with respect to consistency with renewable energy and energy efficiency plans. Therefore, the cumulative impact related to energy would be less than significant.

Overall Level of Cumulative Significance

Significant and unavoidable

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3.7 Hazards, Hazardous Materials, and Wildfire

3.7.1 Introduction

This section describes the existing hazards, hazardous materials, and wildfire conditions in the General Plan and Specific Plan areas as well as the relevant regulatory framework. This section also evaluates the possible impacts related to hazards, hazardous materials, and wildfire that could result from implementation of the proposed plans. Information in this section is based on information available on the Department of Toxic Substances, the State Water Resources Control Board, the California Environmental Protection Agency, California Department of Forestry and Fire Protection, and the City of Millbrae websites.

3.7.2 Environmental Setting

Fundamentals

Hazards

This description of existing conditions focuses on hazards from fire and overhead power lines, as well as hazardous materials and wastes. A hazard is a situation that poses a level of threat to life, health, property, or the environment. Hazards can be dormant or potential, with only a theoretical risk of harm. However, once a hazard becomes active, it can create an emergency. A hazardous situation that has already occurred is called an incident. Emergency response is action taken in response to an unexpected and dangerous occurrence in an attempt to mitigate its impact on people, structures, or the environment. Emergency situations can range from natural disasters to hazardous-materials problems and transportation incidents.

Hazardous Materials

Hazardous materials, as defined by the California Code of Regulations, are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when handled, disposed, or otherwise managed improperly. Hazardous materials are grouped into the following four categories, based on their properties:

- Toxic—causes human health effects
- Ignitable—has the ability to burn
- Corrosive—causes severe burns or damage to materials
- Reactive—causes explosions or generates toxic gases

A hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. If improperly handled, hazardous materials and hazardous waste can result in public health hazards if released into the soil or groundwater or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous constituents higher than specific regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer. The California Code of Regulations, Title 22, Sections 66261.20-24 contain technical descriptions of toxic characteristics that could cause soil or groundwater to be classified as hazardous waste.

HAZARDOUS BUILDING MATERIALS

Many older buildings contain building materials that consist of hazardous materials. These materials include lead-based paint, asbestos-containing material, and polychlorinated biphenyls (PCBs).

Prior to the United States Environmental Protection Agency (USEPA) ban in 1978, lead-based paint was commonly used on interior and exterior surfaces of buildings. Disturbances such as sanding and scraping activities, renovation work, gradual wear and tear, old peeling paint, and paint dust particulates have been found to contaminate surface soils or cause lead dust to migrate and affect indoor air quality. Exposure to residual lead can cause severe health effects, especially in children.

Asbestos is a naturally occurring fibrous material that was extensively used as a fireproofing and insulating agent in building construction materials before such uses were banned by the USEPA in the 1970s due to harmful health effects. In addition, many types of electrical equipment contained PCBs as an insulator, including transformers and capacitors. After PCBs were determined to be a carcinogen in the mid to late 1970s, the USEPA banned PCB use in new equipment and began a program to phase out certain existing PCB-containing equipment. For example, fluorescent lighting ballasts manufactured after January 1, 1978, do not contain PCBs and are required to have a label clearly stating that PCBs are not present in the unit.

HAZARDOUS SUBSTANCES

A hazardous substance can be any biological, natural, or chemical substance, whether solid, liquid, or gas, that may cause harm to human health. Hazardous substances are classified on the basis of their potential health effects, whether acute (immediate) or chronic (long-term). Dangerous goods are classified on the basis of immediate physical or chemical effects, such as fire, explosion, corrosion, and poisoning. An accident involving dangerous goods could seriously harm human health or damage property or the environment. Harm to human health may happen suddenly (acute), such as dizziness, nausea, and itchy eyes or skin; or it may happen gradually over years (chronic), such as dermatitis or cancer. Some people can be more susceptible than others. Hazardous substances and dangerous goods can include antiseptic used for a cut, paint for walls, a cleaning product for the bathroom, chlorine in a pool, carbon monoxide from a motor vehicle, fumes from welding, vapors from adhesives, or dust from cement, stone, or rubber operations. Such hazardous substances can make humans very sick if they are not used properly.

HAZARDOUS WASTES

Hazardous waste is any hazardous material that is to be discarded, abandoned, or recycled. The criteria that define a material as hazardous also define a waste as hazardous. Specifically, materials and waste may be considered hazardous if they are poisonous (toxic); can be ignited by open flame (ignitable); corrode other materials (corrosive); or react violently, explode, or generate vapors when mixed with water (reactive). Soil or groundwater contaminated with hazardous materials above specified regulatory state or federal thresholds is considered hazardous waste if it is removed from a site for disposal. If handled, disposed, or otherwise handled improperly, hazardous materials and hazardous waste can result in public health hazards if released into the soil or groundwater or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous waste when excavated or pumped from an aquifer. The California Code of Regulations, Title 22, Sections 66261.20-24 contains technical descriptions of toxic characteristics that could cause soil or groundwater to be classified as hazardous waste.

Hazardous Materials Listing

The Cortese List is a list of known hazardous materials, including hazardous waste facilities, that meet one or more of the provisions of Government Code Section 65962.5, including:

- The list of hazardous waste and substances sites from the California Department of Toxic Substances Control (DTSC) EnviroStor database.¹
- The list of leaking underground storage tank (LUST) sites by county and fiscal year from the State Water Resources Control Board (State Water Board) GeoTracker database.²
- The list of solid waste disposal sites identified by the State Water Board with waste constituents exceeding hazardous waste levels outside the waste management unit.³
- The list of active cease-and-desist orders and cleanup and abatement orders from the State Water Board.⁴

The list of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, as identified by DTSC.⁵

Presence of Hazardous Materials

General Plan Area

According to databases of hazardous material sites maintained by the DTSC (EnviroStor) and the SWRCB (GeoTracker), the General Plan area has the following types of hazardous sites that are open, active, or need further investigation: underground storage tanks (USTs), cleanup program sites, voluntary cleanup, or evaluation.^{6 7} A list of open hazardous material sites within Millbrae is shown in Table 3.7-1, and the sites are shown on Figure 3.7-1. US Highway 101, located within Millbrae, is designated as a Class 1- Explosives hazardous materials route.⁸

Table 3.7-1 Hazardous Material Sites within Millbrae

Site Address	Site Name	Status
200 Millbrae Avenue	Millbrae BART	Active – Voluntary Cleanup
39-49 El Camino Real	39-49 El Camino Real	Open – Inactive. Cleanup Program Site
446 Broadway	Former Betty-Brite Cleaners	Open – Assessment & Interim Remedial Action
400 El Camino Real	Bishop Property	Open – Site Assessment. LUST Cleanup Site

¹ California Department of Toxic Substances Control (DTSC). "Cortese" list of DTSC EnviroStor database list of Hazardous Waste and Substances sites. DTSC Hazardous Waste and Substances Site List—Site Cleanup (Cortese List). Website: http://www.dtsc.ca.gov/SiteCleanup/Cortese List.cfm.

² State Water Resources Control Board (State Water Board). "Cortese" List of Leaking Underground Storage Tank Sites by County (San

Francisco County). Website: https://geotracker.waterboards.ca.gov/sites_by_county. ³ California Environmental Protection Agency (CalEPA). "Cortese" list of solid waste disposal sites identified with waste constituents above hazardous waste levels outside the waste management unit. Website: http://www.calepa.ca.gov/files/2016/10/SiteCleanup-CorteseList-CurrentList.pdf.

⁴ California Environmental Protection Agency (CalEPA). "Cortese" list of State Water Board sites with active Cease and Desist Orders or Cleanup Abatement Orders. Website: http://www.calepa.ca.gov/files/2016/10/SiteCleanup-CorteseList-CDOCAOList.xlsx.

⁵ California Environmental Protection Agency (CalEPA). "Cortese" list of sites subject to Corrective Action pursuant to Health and Safety Code 25187.5. Website: https://www.calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/.

⁶ California Department of Toxic Substances Control. 2022. EnviroStor.

https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=millbrae%2C+California (accessed April 2022).

⁷ California State Water Resources Control Board. 2022. GeoTracker.

https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=millbrae# (accessed April 2022).

⁸ Federal Motor Carrier Safety Administration. 2019. National Hazardous Materials Route Registry – By State.

https://www.fmcsa.dot.gov/regulations/hazardous-materials/national-hazardous-materials-route-registry-state (accessed June 2022)

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Site Address	Site Name	Status
285 Broadway	Former Peninsula Cleaners – Offsite	Open – inactive
1009 El Camino Real	Rob Baker's Olympic	Open – Site Assessment, LUST Cleanup Site
5 El Camino Real	Unocal Station #3676	Open – Remediation, LUST Cleanup Site

Specific Plan Area

been conducted

The hazardous material sites identified in Table 3.7-1 are primarily located along or in the vicinity of El Camino Real in the eastern portion of Millbrae. There are three open sites within the centermost area of the Specific Plan area. Hazardous material sites located within the Specific Plan Area (as listed in Table 3.7-1) are the Millbrae BART site, Former Betty-Brite Cleaners site, Bishop Property site, Former Peninsular Cleaners -offsite site, and Rob Baker's Olympics. Within the Specific Plan Area, there are no identified hazardous materials transportation routes. However, US Highway 101, an identified Class 1 – Explosives transportation route is located approximately 1,500 feet east of the Specific Plan area.

Proximity to Schools

School locations require consideration, because children are particularly sensitive to hazardous materials exposure. The city also includes sensitive land uses such as hotels and motels; group homes, churches; other learning institutions; and libraries.

General Plan Area

Millbrae School District (MSD) and San Mateo Union High School District (SMUHSD) provide public school services to the City of Millbrae. MSD is a kindergarten through eighth grade district and operates four elementary schools and one middle school. SMUHSD operates seven high schools and one adult education school, with two high schools serving the City.

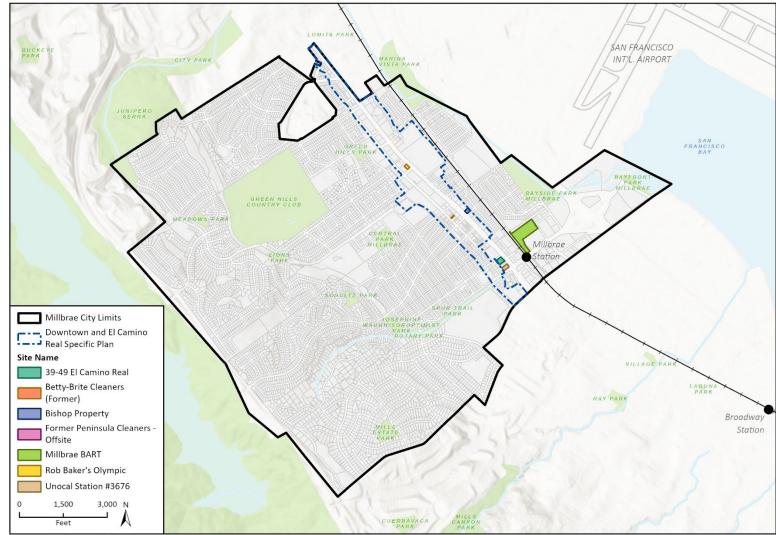
Specific Plan Area

The closest schools to the Specific Plan area are Lomita Park Elementary, located immediately east of the Specific Plan Area, and Green Hills Elementary School, located approximately 0.25-mile to the west.

Wildfire Hazard Area Designations

In California, responsibility for wildfire prevention and suppression is shared by federal, State, and local agencies. Federal agencies are responsible for federal lands in Federal Responsibility Areas (FRA). The State of California has determined that some non-federal lands in unincorporated areas with watershed value are of Statewide interest and have classified those lands as State Responsibility Areas (SRA), which are managed by CAL FIRE.⁹ All incorporated areas and other unincorporated lands are classified as Local Responsibility Areas (LRA).

⁹ United States Department of the Interior, USDA, and CAL FIRE. 2018. 2018-2023 California Master Cooperative Wildland Fire Management and Stafford Act Response Agreement. https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5350828.pdf (accessed April 2022).





Basemap provided by Esri and its licensors © 2022; City of Millbrae, 2021. Additional data provided by DTSC, 2022; SWRCB 2022. Millbrae Maps Fig 3.7-1 Hazardous Material Sites CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors (Public Resources Code Sections 4201-4204 and California Government Code Sections 51175-89). As described above, the primary factors that increase an area's susceptibility to fire hazards include slope, vegetation type and condition, and atmospheric conditions. CAL FIRE maps fire hazards based on zones, referred to as FHSZs. CAL FIRE maps three zones in SRA: 1) Moderate FHSZs; 2) High FHSZs; and 3) Very High FHSZs (VHFHSZs). Only the VHFHSZs are mapped in LRA. Each of the zones influence how people construct buildings and protect property to reduce risk associated with wildfires.

San Mateo County

The mountainous, highly combustible areas in the Santa Cruz Mountains and western San Mateo County have Fire Hazard Severity Zone (FHSZ) rankings of "very high" to "moderate," and are located approximately 1.5 miles west of Millbrae. The area immediately east of Interstate 280 has a FHSZ ranking of "very high"¹⁰ (approximately 4 miles south of Millbrae) and, therefore, is highly susceptible to wildfires. Communities near this area include western Belmont, San Mateo, Redwood City, San Carlos, Emerald Lake Hills, Woodside, and Hillsborough.

General Plan Area

The City of Millbrae is identified by CAL FIRE as a local responsibility area (LRA). The western edge of Millbrae is subject to moderate to high fire hazard risk. Neighborhoods situated on the northwestern edge of the Millbrae city limits are located in a moderate risk zone, as are communities in a one-mile stretch between Hillcrest Boulevard and Millbrae Avenue. The remainder of Millbrae is designated as "unzoned," indicating that there is no designated fire hazard severity.¹¹ Figure 3.7-2 shows where wildfire hazard severity zones are located near Millbrae.

Specific Plan Area

There are no wildfire hazard severity zones located within the Specific Plan area. The nearest moderate to high fire hazard risk area is located along the western edge of Millbrae, approximately 1.2 miles west of the westernmost boundary of the Specific Plan area.

¹⁰ California Department of Forestry and Fire Protection (CAL FIRE). 2007a Fire Hazard Severity Zone Viewer online mapping tool. https://egis.fire.ca.gov/FHSZ/ (accessed April 2022)

¹¹ Millbrae, City of. 2016. Existing Conditions Report: Hazards and Safety. August 2016. https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed May 2022).

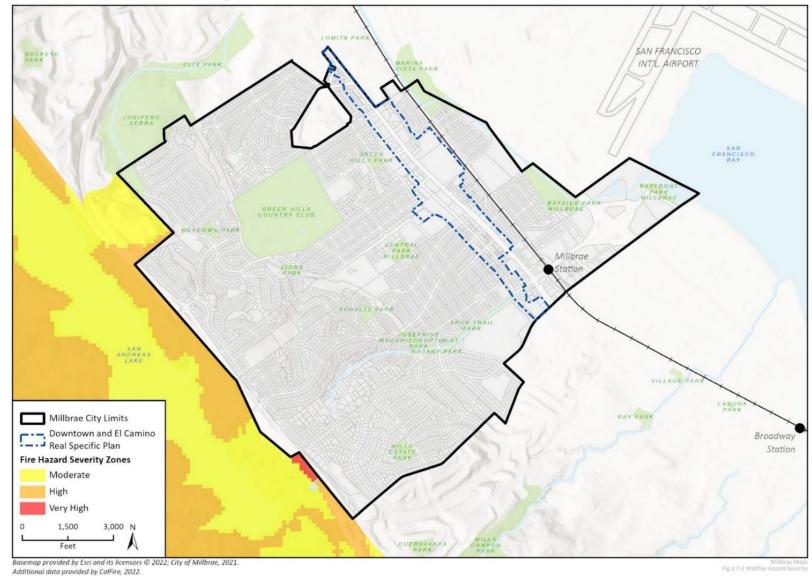


Figure 3.7-2 Wildfire Hazard Severity Zones near Millbrae

Draft Environmental Impact Report

Wildfire-conducive Conditions

Because of substantial open space areas and associated vegetation and wildlife habitats throughout the State, California is subject to fire hazards. Grassland or other vegetation in California is easily ignited, particularly in dry seasons. Wildfire is a serious hazard in high dry fuel load areas, particularly near areas of natural vegetation and steep slopes, since fires tend to burn more rapidly on steeper terrain. Wildfire is also a serious hazard in areas of high wind, given that fires will travel faster and farther geographically when winds are higher. Furthermore, wildfire is more likely in areas where electric power lines are located above ground and could ignite vegetation where it comes into contact. Wildfire could also spread in areas of fuel lines, which could fail (whether due to earthquake or error) and ignite a fire. Extreme wildfire events are expected to increase in frequency with the effects of increased global temperature, although changes in specific fire-prone areas are difficult to predict with any certainty.¹²

The Governor's Office of Planning and Research (OPR) has recognized that although high-density structure-to-structure loss can occur, structures in areas with low- to intermediate-density housing were most likely to burn, potentially due to intermingling with wildland vegetation or difficulty of firefighter access. In general, increasing density decreases risk of wildfire. The risk of loss of human life, property, natural resources, or economic assets from wildfire is highest at the Wildland-Urban Interface (WUI), areas of urban development located adjacent to or even within wildland areas. Today approximately one-third of houses in California are within the WUI area.¹³ It is important to note that there are varying definitions of what constitutes a WUI, and some local or regional agencies consider some areas to be WUI that are not defined as Wildland Interface or Intermix zones under the Wildland-Urban Interface Building Standards in Title 24, Part 2 of the California Code of Regulations (CCR); these standards are discussed under *Regulatory Setting* below.

In addition to stripping the land of vegetation and destroying forest resources, large, intense fires can harm the soil, waterways, and the land itself. Soil exposed to intense heat may lose its capability to absorb moisture and support life. Exposed soils erode quickly and enhance siltation of rivers and streams, thereby enhancing flood potential, harming aquatic life, and degrading water quality. Lands stripped of vegetation are also subject to increased debris flow hazards. Slope instability from wildfire scarring of the landscape can result in slope instability in the form of more intensive flooding and landslides. Such post-fire slope soils and altered drainage patterns can result in soil creep on downslope sides of foundations and reduce lateral support.

Vegetation

Vegetation is fuel to a wildfire, and it changes over time with seasonal growth and die-back. The relationship between vegetation and wildfire is complex, but generally some vegetation is naturally fire resistant, while other vegetation is extremely flammable. Some plant types in California landscapes are fire resistant, while others are fire-dependent for their seed germination cycles.

Wildfire behavior depends on the type of fuels present, such as ladder fuels, surface fuels, and aerial fuels. Surface fuels include grasses, logs, and stumps low to the ground. Ladder fuels, such as tall shrubs, young trees, and the lowest branches of mature trees, provide a path for fire to climb upward into the crowns of trees. Aerial fuels include upper limbs, foliage, and branches not in contact with the ground. Ample spacing in between tree crowns and trimming of lower branches

 ¹² United States Forest Service (USFS). 2022. Wildland Fire. https://www.fs.usda.gov/ccrc/topics/wildfire (accessed April 2022)
 ¹³ California Governor's Office of Planning and Research (OPR) 2020. Fire Hazard Planning Technical Advisory

https://opr.ca.gov/docs/20201109-Draft_Wildfire_TA.pdf (accessed April 2022)

close to the ground is effective at preventing fire from either igniting the crown of a tree or spreading from an ignited tree to adjacent trees; conversely, closely packed trees with low branches are especially susceptible to crown ignition and spread.¹⁴ Weather and climate conditions, including drought cycles, can lead to dry vegetation with low moisture content, increasing its flammability.

Changes in precipitation patterns and increased temperatures associated with climate change will alter the distribution and character of natural vegetation and associated moisture content of plants and soils. An increase in frequency of extreme heat events and drought are also expected. These changes will lead to increased frequency and intensity of large wildfires.¹⁵ According to Cal-Adapt, a majority of San Mateo County will experience a minor increase in the potential amount of area burned by wildfire in 2085.¹⁶ The nearest high-risk zone is a one-mile stretch of vegetation located west of Vallejo Court overlapping with the Millbrae city limit and the edge of the San Andreas Lake.

SAN MATEO COUNTY

Land uses in San Mateo County range from rural, agricultural, and open space; to urban and developed. Due to topography, vegetation, and weather conditions, the Santa Cruz Mountains are conducive to large periodic wildfires. Prior to influences of human development, the mountains would have burned on a decadal basis through a patchwork of burned and unburned areas. In more recent years, with fire suppression and inadequate forest management, fuel loads have increased throughout San Mateo County. There are 39 square miles of WUI in San Mateo County, in areas west of I-280 spanning from Daly City south to East Palo Alto.¹⁷ At the last survey in 2010, there were 14,704 residences within the WUI in the County.¹⁸ Millbrae has a moderate fuel rank hazard and is not in an identified WUI.¹⁹

Although San Mateo County has not experienced a large number of severe wildfires in recent years, in 2020 the CZU²⁰ Lightning Complex Fire burned 86,509 acres, destroyed 1,490 structures, claimed one life, and was the seventh costliest wildfire in United States history.²¹

GENERAL PLAN AREA

Land in the General Plan area largely consists of developed areas that are generally devoid of natural vegetation. According to the City's Existing Conditions Report, approximately 80 percent of the General Plan area is developed with paved areas and structures, while an additional approximately 19 percent of the General Plan area is designated as developed landscaping (woodland/shrubland/forest). The General Plan area has a moderate fuel rank hazard and is not in

¹⁴ CAL FIRE. 2022. Fire and Fuels Treatment. https://www.fire.ca.gov/programs/resource-management/resource-protectionimprovement/landowner-assistance/forest-stewardship/fire-and-fuels-treatment/ (accessed April 2022).

¹⁵ Millbrae, City of. 2016. Existing Conditions Report: Climate Change. August 2016. https://millbrae2040.com/wp-

content/uploads/2015/12/MillGPU_PRD_BR_09_Climate-Change.pdf (accessed May 2022).

¹⁶ Millbrae, City of. 2016. Existing Conditions Report: Climate Change. August 2016. https://millbrae2040.com/wp-

content/uploads/2015/12/MillGPU_PRD_BR_09_Climate-Change.pdf (accessed May 2022).

¹⁷ San Mateo, County of. 2022. San Mateo County Hazards: Fire Wildland Urban Interface.

https://www.smcgov.org/media/73086/download?inline= (accessed June 2020).

¹⁸ FireSafe San Mateo. 2020. Fire History of San Mateo County. https://www.firesafesanmateo.org/resources/fire-history (accessed April 2022)

¹⁹ Millbrae, City of. 2016. Existing Conditions Report: Hazards and Safety. August 2016. https://millbrae2040.com/wp-

content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed May 2022).

 $^{^{\}rm 20}$ CZU is a Cal Fire designation for its San Mateo-Santa Cruz unit.

²¹ CAL FIRE 2022a. The 2020 Fire Siege Report. https://www.fire.ca.gov/media/hsviuuv3/cal-fire-2020-fire-siege.pdf (accessed April 2022)

an identified WUI.²² The nearest high-risk zone is a one-mile stretch of vegetation located west of Vallejo Court overlapping with the Millbrae city limit and the edge of the San Andreas Lake.

SPECIFIC PLAN AREA

Land in the Specific Plan area largely consists of developed areas that are generally devoid of natural vegetation.

Slope and Aspect

According to CAL FIRE, sloping land increases susceptibility to wildfire because fire typically burns faster up steep slopes, and they may hinder firefighting efforts.²³ Following severe wildfires, sloping land is also more susceptible to landslide or flooding from increased runoff during substantial precipitation events. Aspect is the direction that a slope faces, and it determines how much radiated heat the slope will receive from the sun. Slopes facing south to southwest will receive the most solar radiation and are warmer and drier than slopes facing a northerly to northeasterly direction, increasing the potential for wildfire ignition and spread.²⁴

SAN MATEO COUNTY

The Bayside of San Mateo County largely consists of mudflats, marshes, artificial fill, and broad flat alluvial plains. The low-lying Bayside region gradually increases in slope toward the Santa Cruz Mountains, eventually becoming rolling foothills. The San Andreas Fault parallels the Santa Cruz Mountain range, delineating the threshold of the Bayside and beginning of the Santa Cruz mountainside.²⁵ The Coast-side of San Mateo County consists of sloping foothills of the Santa Cruz Mountains to nearly sea-level coastal terraces along the Pacific Ocean.²⁶ The southwestern portion of the County has experiences repeated damage from debris flows, including the Tunitas Creek, San Gregorio, and Pescadero watersheds. Debris flows are also widespread on the natural slopes west of Skyline Ridge as well as in Alpine Road, Crystal Springs, San Bruno Mountain, and Point San Pedro.²⁷

GENERAL PLAN AREA

Millbrae is located in urban and suburban land uses ranging from flat areas in the eastern portions to hilly areas in the western portions. Millbrae is not located within a State designated earthquake induced landslide hazard zone. However, the Association of Bay Area Government's Resilience Program has identified past landslides in the steeper slopes throughout the western portion of the City. Recent landslide events in Millbrae include landslides in the areas of Sleepy Hollow, Clearfield, and Morningside in 1998 and Crestview in 2000.²⁸

²³ CAL FIRE. 2007b. Fact Sheet: California's Fire Hazard Severity Zones. May 2007.

https://www.sccgov.org/sites/dpd/DocsForms/Documents/Fire_Hazard_Zone_Fact_Sheet.pdf (accessed April 2022).

²² Millbrae, City of. 2016. Existing Conditions Report: Hazards and Safety. August 2016. https://millbrae2040.com/wpcontent/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed May 2022).

²⁴ University of California. 2018. Field Operations Manual. Revised November 2018. https://www.ucop.edu/safety-and-loss-

prevention/_files/field-research-safety/wildland-fire-safety.pdf (accessed April 2022).

²⁵ San Mateo, County of. 2021. 2021 Multijurisdictional LHMP. https://www.smcgov.org/ceo/2021-multijurisdictional-lhmp (accessed June 2022).

²⁶ Ibid.

²⁷ Ibid.

²⁸ Millbrae, City of. 2016. Existing Conditions Report: Hazards and Safety. August 2016. https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed May 2022).

SPECIFIC PLAN AREA

The Specific Plan area is located in a mostly urbanized area within a primarily flat area in the eastern portion of Millbrae. Recent landslide events in Millbrae include landslides in the areas of Sleepy Hollow, Clearfield, and Morningside in 1998 and Crestview in 2000.²⁹ The Specific Plan area is not located near a landslide area.

Weather and Atmospheric Conditions

Wind, temperature, and relative humidity are the most influential weather elements in fire behavior and susceptibility.³⁰ Fire moves faster under hot, dry, and windy conditions. Wind may also blow embers ahead of a fire, causing its spread. Drought conditions lead to extended periods of excessively dry vegetation, increasing the fuel load and ignition potential.

According to data collected by the California Energy Commission, most precipitation is received from October through April, with an average annual rainfall of 26.4 inches.³¹ May through September is the driest time of the year and coincides with what has traditionally been considered the fire season in California. However, increasingly persistent drought and climatic changes in California have resulted in drier winters, and fires during the autumn, winter, and spring months are becoming more common.

SAN MATEO COUNTY

Prevailing winds in the County tend to travel in a northwest to southwest direction.³²

GENERAL PLAN AND SPECIFIC PLAN AREAS

Prevailing winds in the General Plan and Specific Plan areas are generally from the west off of the ocean from February to November, and from the north during December and January.³³

The closest Bay Area Air Quality Management District (BAAQMD) air data monitoring stations are located in the City of San Francisco, approximately 7 miles to the north of Millbrae and in Redwood City, approximately 10 miles south of Millbrae.³⁴ Prevailing northwesterly winds from the central and northern portions of the Bay Area generally move toward the Santa Clara Valley.³⁵

Fuel and Energy Lines

Electric power lines mostly occur in urban areas and along roadways. Electric power, natural gas, and petroleum lines pose a risk of causing fire in the event of failure (whether due to earthquake or error). Natural gas poses a lower risk of causing a fire than petroleum products because it is transported at lower pressures and, when released, rises and dissipates into the atmosphere.³⁶

³⁴ Bay Area Air Quality Management District. 2022. Draft 2022 Annual Air Monitoring Network Plan.

²⁹ Millbrae, City of. 2016. Existing Conditions Report: Hazards and Safety. August 2016. https://millbrae2040.com/wp-content/uploads/2015/12/MillGPU_PRD_BR_08_HazardsSafety.pdf (accessed May 2022).

³⁰ CAL FIRE. 2022. Fire and Fuels Treatment. https://www.fire.ca.gov/programs/resource-management/resource-protectionimprovement/landowner-assistance/forest-stewardship/fire-and-fuels-treatment/ (accessed April 2022).

³¹ California Energy Commission. 2022. Cal-Adapt [tool]. https://cal-adapt.org/tools/annual-averages (accessed April 2022).

³²National Oceanic and Atmospheric Administration. 2022. U.S. Wind Climatology. February 2022. https://www.ncdc.noaa.gov/societalimpacts/wind/maps/202202 (accessed April 2022)

³³ National Oceanic and Atmospheric Administration. 2022. U.S. Wind Climatology. February 2022. https://www.ncdc.noaa.gov/societalimpacts/wind/maps/202202 (accessed April 2022)

https://www.baaqmd.gov/~/media/files/technical-services/2022_network_plan-pdf.pdf?la=en (accessed June 2022). ³⁵ Ibid.

³⁶ United States Department of Energy. 2022. Alternative Fuels Data Center. https://afdc.energy.gov/vehicles/natural_gas_safety.html (accessed June 2022).

SAN MATEO COUNTY

Natural gas and petroleum pipelines occur across San Mateo County, including residential and commercial areas.

GENERAL PLAN AREA

There are natural gas pipelines that traverse the General Plan area underneath US Highway 101 and under I-280 in the western portion of Millbrae.³⁷ The natural gas pipeline that extends along US Highway 101 deviates slightly east and nears Caltrain tracks and along the eastern side of 7th Avenue within Millbrae. Natural gas pipelines also extend to residential customers throughout Millbrae. Electric lines also typically occur above ground, along streets and roadways.

SPECIFIC PLAN AREA

There are natural gas pipelines that traverse the Specific Plan Area underneath US Highway 101.³⁸ Electric lines also typically occur above ground, along streets and roadways.

Emergency and Evacuation Routes/Access

San Mateo County

The San Mateo County Department of Emergency Management and the San Mateo County Sheriff's Office – Office of Emergency Services coordinates Countywide preparedness, response and protection services and activities for large scale incidents and disasters. Within San Mateo County, the main routes into and out of the County that would most likely be used as evacuation routes are US Highway 101, Interstate 280, El Camino Real (State Route 82), and Skyline Boulevard (State Route 35).

General Plan Area

The San Mateo County Sheriff's Office – Office of Emergency Services is responsible for planning, outreach, and training or disaster management and emergency preparedness for the City. The main routes into and out of Millbrae that would most likely be used as evacuation routes are US Highway 101, Interstate 280, and El Camino Real (State Route 82).

The Central County Fire Department (CCFD) provides fire and medical services for the City of Millbrae. There are two CCFD fire departments located within the Millbrae city limits – Station 37 located at 511 Magnolia Avenue and Station 38 located at 785 Crestview Drive.³⁹ Daily staffing of the stations includes seven captains, seven firefighters and paramedics, eight firefighters, and one battalion chief.

Specific Plan Area

The San Mateo County Sheriff's Office – Office of Emergency Services is responsible for planning, outreach, and training or disaster management and emergency preparedness for the City. The main routes into and out of Millbrae that would most likely be used as evacuation routes are US Highway 101, Hillcrest Boulevard, Millbrae Avenue, Interstate 280, Broadway, and El Camino Real (State Route 82).

³⁷ National Pipeline Mapping System. 2022. NPMS Public Viewer. https://pvnpms.phmsa.dot.gov/PublicViewer/ (accessed June 2022).

³⁸ Millbrae, City of. 1998. Millbrae General Plan Safety Element.

The Central County Fire Department (CCFD) provides fire and medical services for the City of Millbrae. There are two CCFD fire departments located within the Millbrae city limits – Station 37 located at 511 Magnolia Avenue and Station 38 located at 785 Crestview Drive.⁴⁰ Daily staffing of the stations includes seven captains, seven firefighters and paramedics, eight firefighters, and one battalion chief.

Airport Safety Zone Proximity

Figure 3.7-3 depicts the San Francisco International Airport (SFO) safety zones locations within Millbrae.

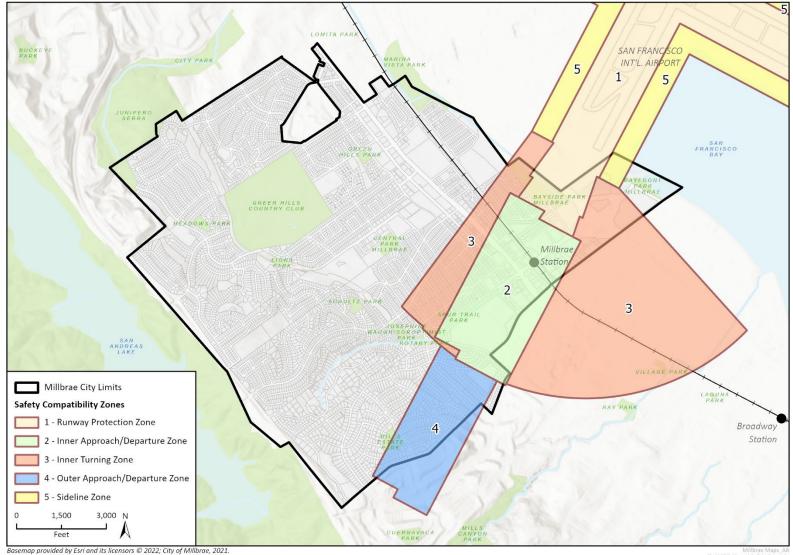
General Plan Area

The San Francisco International Airport (SFO) is located adjacent to the east of Millbrae. SFO adopted an ALUCP pursuant to California law to ensure compatibility between the airport and nearby land uses. The ALUCP specifies that Millbrae is located entirely within Airport Influence Area A.⁴¹ Airport Influence Area A is overflown by aircraft flying to and from SFO multiple times a week at altitudes of 10,000 feet or less above mean sea level. Airport Influence Area A is also defined as being a real estate disclosure area. This would require that within Area A, the real estate disclosure requirements of State law apply. Section 11010 of the Business and Professions Code requires people offering subdivided property for sale or lease to disclose the presence of all existing and planned airports within two miles of the property as being within an airport influence area as designated by the airport land use commission and a statement must be included in every notice of intention to offer a property for sale within the area.⁴² Safety Zone 1 is an area of relatively high accident risk that the Federal Aviation Administration encourages airport proprietors to own and keep free of objects, structures, and incompatible uses, including places of assembly, fuel storage, and wildlife attractants. Safety Zone 2 incompatible uses include children's schools, day care centers, noncommercial employer sponsored centers, hospitals, nursing zones, hazardous uses, critical public utilities, places of assembly, stadiums, and arenas. Safety Zone 3 incompatible uses include Biosafety Level 3 and 4 facilities, children's schools, child day care centers, hospitals, and stadiums. Safety Zone 4 incompatible uses include Biosafety Level 3 and 4 facilities, children's schools, child day care centers, hospitals, and stadiums.

⁴¹ San Mateo, County of. 2020. SFIA Airport Influence Areas [map]. https://hub.arcgis.com/datasets/smcmaps::sfia-land-use-compatibility-plan-map-layers/explore?layer=2&location=37.600133%2C-122.305886%2C10.57 (accessed April 2022).

⁴² City/County Association of Governments of San Mateo County (C/CAG). 2012. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport. November 2012. https://ccag.ca.gov/wp-

content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf (accessed April 2022).





Additional data provided by County of San Mateo, 2020.

Millbrae Maps_AB Fig X SFO Airport Safety Zones in

Specific Plan Area

The San Francisco International Airport (SFO) is located adjacent to the east of the city. SFO adopted an ALUCP pursuant to California law to ensure compatibility between the airport and nearby land uses. The ALUCP specifies that the Specific Plan area would be within Airport Influence Area A.⁴³ Within Airport Influence Area A, the area is overflown by aircraft flying to and from SFO at least once per week at altitudes of 10,000 feet or less above mean sea level. Airport Influence Area A is also defined as being a real estate disclosure area. This would require that within Area A, the real estate disclosure requirements of state law apply. Section 11010 of the Business and Professions Code requires people offering subdivided property for sale or lease to disclose the presence of all existing and planned airports within two miles of the property as being within an airport influence area as designated by the airport land use commission and a statement must be included in every notice of intention to offer a property for sale within the area.⁴⁴

Regulatory Framework

Federal Regulations

Resource Conservation and Recovery Act and Comprehensive Environmental Response, Compensation, and Liability Act

The USEPA is responsible for implementing and enforcing federal laws and regulations pertaining to hazardous materials. The primary legislation includes the Resource Conservation and Recovery Act of 1976 (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA) and the Emergency Planning and Community Right-to-Know Act (known as SARA Title III). RCRA and the 1984 RCRA Amendments regulate the treatment, storage, and disposal of hazardous and nonhazardous wastes and mandate that hazardous wastes be tracked from the point of generation to their ultimate fate in the environment, including detailed tracking of hazardous materials during transport and permitting of hazardous material handling facilities. As permitted by RCRA, in 1992, the USEPA approved California's program called the Hazardous Waste Control Law (HWCL). administered by the DTSC, to regulate hazardous wastes in California, as discussed further below. The purpose of CERCLA is to identify and clean up chemically contaminated sites that pose a significant environmental health threat, and the Hazard Ranking System is used to determine whether a site should be placed on the National Priorities List for cleanup activities. SARA relates primarily to emergency management of accidental releases and requires annual reporting of continuous emissions and accidental releases of specified compounds that are compiled into a nationwide Toxics Release Inventory. Finally, SARA Title III requires formation of state and local emergency planning committees that are responsible for collecting material handling and transportation data for use as a basis for planning and provision of chemical inventory data to the community at large under the "right-to-know" provision of the law.

⁴³ San Mateo, County of. 2020. SFIA Airport Influence Areas [map]. https://hub.arcgis.com/datasets/smcmaps::sfia-land-usecompatibility-plan-map-layers/explore?layer=2&location=37.600133%2C-122.305886%2C10.57 (accessed April 2022).

⁴⁴ City/County Association of Governments of San Mateo County (C/CAG). 2012. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport. November 2012. https://ccag.ca.gov/wp-

content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf (accessed April 2022).

Hazardous Materials Transportation Act

Under the Hazardous Materials Transportation Act of 1975, the United States Department of Transportation (DOT), Office of Hazardous Materials Safety regulates the transportation of hazardous materials on water, rail, highways, through air, or in pipelines, and enforces guidelines created to protect human health and the environment and reduce potential impacts by creating hazardous-material packaging and transportation requirements. It also includes provisions for material classification, packaging, marking, labeling, placecarding, and shipping documentation. The DOT provides hazardous-materials safety training programs and supervises activities involving hazardous materials. In addition, DOT develops and recommends regulations governing the multimodal transportation of hazardous materials.

Aboveground Petroleum Storage Act, and Spill Prevention, Control, and Countermeasure Rule

The Aboveground Petroleum Storage Act of 1990, and the Spill Prevention, Control, and Countermeasure (SPCC) Rule (amended 2010) of the Oil Pollution Prevention regulation (40 Code of Federal Regulations [CFR] 112) require the owner or operator of a tank facility with an aggregate storage capacity greater than 1,320 gallons to notify the local Certified Unified Program Agency (CUPA) and prepare an SPCC plan. The SPCC plan must identify appropriate spill containment measures and equipment for diverting spills from sensitive areas, and must discuss facility-specific requirements for the storage system, inspections, recordkeeping, security, and training.

Clean Water Act

The Clean Water Act (CWA) (Title 33 § 1251 et seq. of the United States Code [33 USC 1251, et seq.]) is the major federal legislation governing water quality. The CWA established the basic structure for regulating discharges of pollutants into waters of the United States. The objective of the act is "to restore and maintain the chemical, physical, and biological integrity of the nation's waters." The CWA establishes the basic structure for regulating the discharge of pollutants into waters of the United States. Responsibility for administering the CWA resides with the State Water Board and nine RWQCBs; the San Francisco Bay RWQCB administers the CWA in the Millbrae area.

Section 404 of the CWA regulates temporary and permanent fill and disturbance of waters of the United States, including wetlands. The United States Army Corps of Engineers requires that a permit be obtained if a project proposes to place fill in navigable waters and/or to alter waters of the United States below the ordinary high-water mark in nontidal waters. Section 401 of the CWA requires compliance with State water quality standards for actions within State waters. Compliance with the water quality standards required under Section 401 is a condition for issuance of a Section 404 permit. Under Section 401 of the CWA, every applicant for a permit or license for any activity that may result in a discharge to a water body must obtain a State water quality certification from the RWQCB to demonstrate that the proposed activity would comply with State water quality standards.

Federal Insecticide, Fungicide, and Rodenticide Act

This Act (7 U.S. Code [USC] 136 et seq.) provides Federal control of pesticide distribution, sale, and use. The USEPA was given authority under the Act to study the consequences of pesticide usage, and to require users (farmers, utility companies, and others) to register when purchasing pesticides. Later amendments to the law required users to take exams for certification as applicators of pesticides. All pesticides used in the United States must be registered (licensed) by the USEPA.

Registration assures that pesticides will be properly labeled and that, if used in accordance with specifications, they will not cause unreasonable harm to the environment.

Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations

Governed by the U.S. Housing and Urban Development, regulations for LBP are contained in the Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations (CFR) 33, which requires sellers and lessors to disclose known LBP and LBP hazards to perspective purchasers and lessees. Additionally, all LBP abatement activities must follow California and federal occupational safety and health administrations (California Occupational Safety and Health Administration [CalOSHA] and federal Occupational Safety and Health Administration [OSHA], respectively) and with the State of California Department of Health Services requirements. Only LBP trained and certified abatement personnel can perform abatement activities. All lead LBP removed from structures must be hauled and disposed of by a transportation company licensed to transport this type of material at a landfill or receiving facility licensed to accept the waste.

Federal Disaster Mitigation Act

The Disaster Mitigation Act of 2000 requires a State-level mitigation plan as a condition of disaster assistance and provides funding to communities developing their own mitigation plans through the Pre-Disaster Mitigation Grant Program. There are two different levels of State disaster plans: "Standard" and "Enhanced." States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act also established new requirements for local mitigation plans.

National Fire Plan

The National Fire Plan was developed in August 2000, following a historic wildfire season. Its intent is to establish plans for active response to severe wildfires and their impacts to communities while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability.

State Regulations

California Hazardous Waste Control Law

The California Hazardous Waste Control Law (HWCL) is the primary hazardous waste statute in the State of California, and implements RCRA as a "cradle-to-grave" waste management system in the State of California for handling hazardous wastes in a manner that protects human health and the environment and would reduce potential resulting impacts. The law specifies that generators have the primary duty to determine whether their waste is hazardous and to ensure proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous waste used or reused as raw materials. The law exceeds federal requirements by mandating source reduction planning, and a much broader requirement for permitting facilities that treat hazardous waste. It also regulates a number of types of waste and waste management activities that are not covered by federal law.

The hazardous waste management program enforced by DTSC was created by the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in California Code of Regulations (CCR) Title 26. The State program is similar to, but more stringent than, the federal program under RCRA. The regulations list materials that may be hazardous, and establish criteria for their identification, packaging, and disposal.

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Environmental health standards for management of hazardous waste are contained in CCR Title 22, Division 4.5. As required by California Government Code Section 65962.5, DTSC maintains a Hazardous Waste and Substances Site List for the State called the Cortese List.

If any soil is excavated from a site containing hazardous materials, it would be considered a hazardous waste if it exceeded specific criteria in Title 22 of the California Code of Regulations. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

California Health and Safety Code

The California Health and Safety Code (HSC § 25141) defines hazardous waste as a waste or combination of waste that may:

... because of its quantity, concentration, or physical, chemical, or infection characteristics:

- (1) Cause or significantly contribute to an increase in mortality or an increase in serious irreversible or incapacitation-reversible illness.
- (2) Pose a substantial present or potential hazard to human health or the environment, due to factors including, but not limited to, carcinogenicity, acute toxicity, chronic toxicity, bioaccumulative properties, or persistence in the environment, when improperly treated, stored, transported, or disposed of or otherwise managed.

This statutory framework establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management practices for hazardous wastes; establishes permit requirements for hazardous-waste treatment, storage, disposal, and transportation; and identifies hazardous waste that commonly would be disposed of in landfills.

Under both the RCRA and HWCL, hazardous-waste manifests must be retained by the generator for a minimum of 3 years. The generator must match copies of the manifests with copies of manifest receipts from the treatment, disposal, or recycling facility.

In accordance with Chapter 6.11 of the California Health and Safety Code (HSC § 25404, et seq.), local regulatory agencies enforce many federal and State regulatory programs through the Certified Unified Program Agencies program, including:

- Hazardous Materials Business Plans (HMBPs) (HSC § 25501, et seq.);
- State Uniform Fire Code (UFC) requirements (UFC § 80.103, as adopted by the State Fire Marshal pursuant to HSC § 13143.9);
- Underground Storage Tanks (USTs) (HSC § 25280, et seq.);
- Aboveground storage tanks (HSC § 25270.5[c]); and
- Hazardous-waste-generator requirements (HSC § 25100, et seq.).

San Mateo County Health is the CUPA for San Mateo County and enforces State statutes and regulations through the Hazardous Materials Unified Program Agency (HMUPA). The HMUPA oversees aboveground petroleum tanks; generation of hazardous materials; storage and treatment;

USTs; generation of medical waste; the accidental-release prevention program; and the Local Oversight Program, which interfaces with the State Water Board and the San Francisco Bay RWQCB on LUSTs and UST release sites. An HMBP must be submitted if a facility ever handles any individual hazardous material in an aggregate amount equal to or greater than 55 gallons (liquids), 500 pounds (solids), or 200 cubic feet (gases). An HMBP must include:

- Details that include facility floor plans and identify the business conducted at the site;
- An inventory of hazardous materials handled or stored on the site;
- An emergency response plan; and

A training program in safety procedures and emergency response for new employees who may handle hazardous materials, with an annual refresher course in the same topics for those same employees.

California Code of Regulations Title 8 (Workplace Safety Regulations)

The California Division of Occupational Safety and Health (CalOSHA) assumes primary responsibility for developing and enforcing workplace safety regulations. These regulations concern the use of hazardous materials in the workplace, including requirements for employee safety training; availability of safety equipment; accident and illness prevention programs; hazardous-substance exposure warnings; and preparation of emergency action and fire prevention plans.

CalOSHA also enforces hazard communication program regulations, including procedures for identifying and labeling hazardous substances, and requires that safety data sheets (formerly known as material safety data sheets) be available for employee information and training programs. CalOSHA standards are generally more stringent than federal regulations. Construction workers and operational employees within the plan area would be subject to these requirements.

California Code of Regulations, Title 8, Section 1529 authorizes CalOSHA to implement the survey requirements of CFR Title 29 relating to asbestos. These federal and state regulations require facilities to take all necessary precautions to protect employees and the public from exposure to asbestos. Workers who conduct asbestos abatement must be trained in accordance with federal and State OSHA requirements. The BAAQMD oversees the removal of regulated asbestos-containing materials (see "Asbestos Demolition, Renovation, and Manufacturing Rule" below).

California Code of Regulations Title 8, Section 1532.1 includes requirements to manage and control exposure to lead-based paint. These regulations cover the demolition, removal, cleanup, transportation, storage, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring, and compliance to ensure the safety of construction workers exposed to lead-based material. Loose and peeling lead-based paint must be disposed of as a State and/or federal hazardous waste if the concentration of lead equals or exceeds applicable hazardous waste thresholds. Federal and State OSHA regulations require a supervisor who is certified with respect to identifying existing and predictable lead hazards to oversee air monitoring and other protective measures during demolition activities in areas where lead-based paint may be present. Special protective measures and notification of CalOSHA are required for highly hazardous construction tasks related to lead, such as manual demolition, abrasive blasting, welding, cutting, or torch burning of structures, where lead-based paint is present.

California Code of Regulations Title 14 – Fire Safe Roads

The Board of Forestry maintains fire safe road regulations, as part of CCR Title 14. This includes requirements for road width, surface treatments, grade, radius, turnarounds, turnouts, structures, driveways, and gate entrances. These regulations are intended to ensure safe access for emergency wildland fire equipment and civilian evacuation.

California Code of Regulations Title 22 (Environmental Health Standards for the Management of Hazardous Waste)

California Code of Regulations Title 22, Division 4.5 contains the Environmental Health Standards for the Management of Hazardous Waste, which includes California waste identification and classification regulations. California Code of Regulations Title 22, Chapter 11, Article 3, "Soluble Threshold Limits Concentrations/Total Threshold Limits Concentration Regulatory Limits," identifies the concentrations at which soil is determined to be a California hazardous waste. California's Universal Waste Rule (22 CCR § 66273) provides an alternative set of management standards in lieu of regulation as hazardous wastes for certain common hazardous wastes, as defined in 22 California Code of Regulations Section 66261.9. Universal wastes include fluorescent lamps, mercury thermostats, and other mercury-containing equipment. Existing structures may contain fluorescent light ballasts that could contain mercury or lead. The Alternative Management Standards for Treated Wood Waste (22 CCR § 67386) were developed by DTSC to allow for disposal of treated wood as a nonhazardous waste, to simplify and facilitate the safe and economical disposal of such waste. Chemically treated wood can contain elevated levels of hazardous chemicals (e.g., arsenic, chromium, copper, pentachlorophenol, or creosote) that equal or exceed applicable hazardous waste thresholds. The Alternative Management Standards provide for less stringent storage requirements and extended accumulation periods, allow shipments without a hazardous waste manifest and a hazardous waste hauler, and allow disposal at specific nonhazardous waste landfills.

California Code of Regulations Title 24 (California Building Code)

Updated every three years through a rigorous stakeholder process, Title 24 of the California Code of Regulations requires California homes and businesses to meet strong fire and safety measures. Title 24 contains numerous subparts, including Part 1 (Administrative Code), Part 2 (Building Code), Part 3 (Electrical Code), Part 4 (Mechanical Code), Part 5 (Plumbing Code), Part 6 (Energy Code), Part 8 (Historical Building Code), Part 9 (Fire Code), Part 10 (Existing Building Code), Part 11 (Green Building Standards Code), Part 12 (Referenced Standards Code). The California Building Code is applicable to all development in California. (Health and Safety Code §§ 17950 and 18938(b).)

The regulations receive input from members of industry, as well as the public, with the goal of "[r]educing of wasteful, uneconomic, inefficient, or unnecessary consumption of energy." (Pub. Res. Code § 25402.) These regulations are scrutinized and analyzed for technological and economic feasibility (Pub. Res. Code § 25402(d)) and cost effectiveness (Pub. Res. Code § 25402(b)(2) and (b)(3)).

PART 2 - CALIFORNIA BUILDING CODE: FIRE SAFETY REQUIREMENTS

The State of California provided a minimum standard for building design through the 2016 California Building Standards Code (CBC), which is located in Part 2 of Title 24 of the California Code of Regulations. The 2016 CBC is based on the 2015 International Building Code, but has been modified for California conditions. It is generally adopted on a jurisdiction by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-

checked by local City and County building officials for compliance with the CBC. Typical fire safety requirements of the CBC include the installation of sprinklers in all new high-rise buildings and residential buildings; the establishment of fire resistance standards for fire doors, building material; and particular types of construction.

PART 2 - CALIFORNIA BUILDING CODE: WILDLAND-URBAN INTERFACE BUILDING STANDARDS

On September 20, 2005, the Building Standards Commission approved the Office of the State Fire Marshal's emergency regulations amending the CCR Title 24, Part 2, known as the 2007 CBC. These codes include provisions for ignition-resistant construction standards in the WUI.

Interface zones are areas with dense housing adjacent to vegetation that can burn and meeting the following criteria:

- 1. Housing density class 2 (one house per 20 acres to one house per 5 acres), 3 (more than one house per 5 acres to one house per acre), or 4 (more than one house per acre)
- 2. In Moderate, High, or Very High Fire Hazard Severity Zone
- 3. Not dominated by wildland vegetation (i.e., lifeform not herbaceous, hardwood, conifer, or shrub)
- 4. Spatially contiguous groups of 30-meter cells⁴⁵ that are 10 acres and larger

Intermix zones are housing development interspersed in an area dominated by wildland vegetation and must meet the following criteria:

- 1. Not interface
- 2. Housing density class 2
- 3. Housing density class 3 or 4, dominated by wildland vegetation
- 4. In Moderate, High, or Very High Fire Hazard Severity Zone
- 5. Improved parcels only
- 6. Spatially contiguous groups of 30-meter cells 25 acres and larger

Influence zones have wildfire-susceptible vegetation up to 1.5 miles from an interface zone or intermix zone.⁴⁶

While the 2007 CBC creates WUI definitions for interface, intermix and influence zones in order to apply required construction standards, many local and regional entities use their own definitions of WUI areas for other purposes, ranging from simple resident awareness and public outreach to further municipal-level standards.

PART 9 – CALIFORNIA FIRE CODE

The 2022 California Fire Code is Part 9 of CCR Title 24. It establishes the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structure, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may

⁴⁵ "30-meter cells" refers to satellite mapping or Geographic Information Systems (GIS) data, and indicates data is presented as 30-meter by 30-meter squares in the source maps used to determine zone types.

⁴⁶ CAL FIRE. 2019. Wildland Urban Interface (WUI) [map]. https://frap.fire.ca.gov/media/10300/wui_19_ada.pdf (accessed April 2022)

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pose a threat to public health and safety. The California Fire Code regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The California Fire Code and the California Building Code (CBC) use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines and specialized equipment. To ensure that these safety measures are met, the California Fire Code employs a permit system based on hazard classification. The provisions of this Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout California.

More specifically, the Fire Code is included in CCR Title 24. Title 24, part 9, Chapter 7 addresses fireresistances-rated construction; CBC (Part 2), Chapter 7A addresses materials and construction methods for exterior wildfire exposure; Fire Code Chapter 8 addresses fire related Interior finishes; Fire Code Chapter 9 addresses fire protection systems; and Fire Code Chapter 10 addresses fire related means of egress, including fire apparatus access road width requirements. Fire Code Section 4906 also contains existing regulations for vegetation and fuel management to maintain clearances around structures. These requirements establish minimum standards to protect buildings located in FHSZs within SRAs and WUI Fire Areas. This code includes provisions for ignition-resistant construction standards for new buildings.

California Porter-Cologne Act

The Porter-Cologne Water Quality Control Act of 1969 (Porter-Cologne Act) is California's statutory authority for the protection of water quality. Under the Porter-Cologne Act, the State must adopt water quality policies, plans, and objectives that protect the State's waters for the use and enjoyment of the people. Regional authority for planning, permitting, and enforcement is delegated to the nine RWQCBs. The RWQCBs are required to formulate and adopt water quality control plans (also known as basin plans) for all areas of the region and establish water quality objectives in the plans. The Porter-Cologne Act sets forth the obligations of the State Water Board and RWQCBs to adopt and periodically update water quality control plans that recognize and reflect the differences in existing water quality conditions and problems. It also authorizes the State Water Board and RWQCBs to issue and enforce waste discharge requirements and to implement programs for controlling pollution in State waters. Finally, the Porter-Cologne Act also authorizes the State Water Board and RWQCBs to soils and groundwater and in some cases to surface waters or sediments.

California Fire Plan

The Strategic Fire Plan for California is the State's roadmap for reducing the risk of wildfire. The most recent version of the plan was finalized in January 2019 and directs each CAL FIRE Unit to address and meet incremental requirements to achieve four specific goals by 2023, including improving core capabilities, enhancing internal operations, ensuring health and safety, and building an engaged workforce.⁴⁷ A core element of the plan is increasing staffing levels from 2.67 employees per position to 3.11 employees per position to ensure adequate staffing during times of increased mobilization.

⁴⁷ CAL FIRE. 2019. Strategic Fire Plan for California. https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-andmitigation/fire-plan/ (accessed April 2022).

CAL FIRE has mapped fire threat potential throughout California. CAL FIRE maps fire threat based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The threat levels include no fire threat, moderate, high, and very high fire threat. Further, the maps designate the City of Millbrae as the Local Responsibility Area for the plan areas. The CAL FIRE Office of the State Fire Marshal provides oversight of enforcement of the California Fire Code as well as overseeing hazardous liquid pipeline safety.

California Multi-Hazard Mitigation Plan

The California Office of Emergency Services (CalOES) prepares the State of California Multi-Hazard Mitigation Plan (SHMP). The SHMP identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is federally required under the Federal Disaster Mitigation Act of 2000 for the State to receive Federal funding. The Federal Disaster Mitigation Act of 2000 requires a State mitigation plan as a condition of disaster assistance.

California Emergency Plan

The foundation of California's emergency planning and response is a Statewide mutual aid system, which is designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with a given situation.

The California Disaster and Civil Defense Master Mutual Aid Agreement (California Government Code Sections 8555–8561) requires signatories to the agreement to prepare operational plans to use within their jurisdiction, and outside their area. These plans include fire and non-fire emergencies related to natural, technological, and war contingencies. The State of California, all State agencies, all political subdivisions, and all fire districts signed this agreement in 1950.

Section 8568 of the California Government Code, the "California Emergency Services Act," states that "the State Emergency Plan shall be in effect in each political subdivision of the State, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof." The Act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a City Manager. The provisions of the Act are reflected and expanded on by appropriate local emergency ordinances. The Act further describes the function and operations of government at all levels during extraordinary emergencies, including war.

All local emergency plans are extensions of the California Emergency Plan. The State Emergency Plan conforms to the requirements of California's Standardized Emergency Management System (SEMS), which is the system required by Government Code 8607(a) for managing emergencies involving multiple jurisdictions and agencies.⁴⁸ The SEMS incorporates the functions and principles of the Incident Command System (ICS), the Master Mutual Aid Agreement, existing mutual aid systems, the operational area concept, and multi-agency or inter-agency coordination. Local governments must use SEMS to be eligible for funding of their response-related personnel costs under State disaster assistance programs. The SEMS consists of five organizational levels that are activated as necessary, including: field response, local government, operational area, regional, and State. CalOES divides the State into several mutual aid regions. San Mateo County is located in Mutual Aid Region II, which includes Del Norte, Humboldt, Mendocino, Sonoma, Lake, Napa, Marin,

⁴⁸ California Office of Emergency Services (CalOES). 2022. Coastal Region Operational Area Assignments. March 2022. https://www.caloes.ca.gov/RegionalOperationsSite/Documents/EMA_ESC_OA_Assignments_Coastal.pdf (accessed April 2022)

Solano, Contra Costa, San Francisco, San Mateo, Alameda, Santa Clara, Santa Cruz, San Benito, and Monterey Counties.⁴⁹

California Senate Bill 1241

California Senate Bill (SB) 1241 requires cities and counties to address fire risk in SRAs and Very High FHSZs in the safety element of their general plans. The bill also amended CEQA to direct amendments to the *CEQA Guidelines* Appendix G environmental checklist to include questions related to fire hazard impacts for projects located in or near lands classified as SRAs and Very High FHSZs. In adopting these Guidelines amendments, the Governor's Office of Planning and Research recognized that generally, low-density, leapfrog development may create higher wildfire risks than high-density, infill development.⁵⁰ In general, new development that will be contemplated within the General Plan and Specific Plan areas would not be considered leapfrog development sites, as they are located near existing development.

California Public Resources Code

The California Public Resources Code (PRC) includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors on construction equipment that use an internal combustion engine; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas.

- These regulations include the following: Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (PRC § 4442);
- Appropriate fire suppression equipment would be maintained during the highest fire danger period—from April 1 to December 1 (PRC § 4428);
- On days when a burning permit is required, flammable materials would be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor would maintain the appropriate fire suppression equipment (PRC § 4427); and
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines would not be used within 25 feet of any flammable materials (PRC § 4431).

California Public Utilities Commission General Order 166

General Order 166 Standard 1.E requires that investor-owned utilities (IOU) develop a Fire Prevention Plan which describes measures that the electric utility will implement to mitigate the threat of power-line fires generally. Additionally, this standard requires that IOUs outline a plan to mitigate power line fires when wind conditions exceed the structural design standards of the line during a Red Flag Warning in a high fire threat area. Fire Prevention Plans created by IOUs are required to identify specific parts of the utility's service territory where the conditions described above may occur simultaneously. Standard 11 requires that utilities report annually to the California Public Utilities Commission (CPUC) regarding compliance with General Order 166.⁵¹ Pacific Gas and

⁴⁹ CalOES. 2022. Coastal Region Operational Area Assignments. March 2022.

https://www.caloes.ca.gov/RegionalOperationsSite/Documents/EMA_ESC_OA_Assignments_Coastal.pdf (accessed April 2022) ⁵⁰ "Leapfrog development" describes the construction of new development at a distance from existing developed areas, with undeveloped land between the existing and new development.

⁵¹ California Public Utilities Commission (CPUC). 2017. General Order Number 165. December 2017.

http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M209/K552/209552704.pdf (accessed April 2022)

Electric Company (PG&E) is the electric utility provider for the City of Millbrae. At the time of issuance of the Notice of Preparation for this EIR, the most recently available report for PG&E was dated October 31, 2019.⁵² PG&E has developed an interim fire threat map that shows very high fire threats west of the City of Millbrae beyond I-280.⁵³

Regional and Local Regulations

BAAQMD Asbestos Demolition, Renovation and Manufacturing Rule

The removal of asbestos-containing building materials is subject to the limitations of BAAQMD Regulation 11, Rule 2, "Hazardous Materials; Asbestos Demolition, Renovation and Manufacturing." This rule prohibits visible emissions to outside air from any operation involving the demolition of any structure containing asbestos, and sets out requirements for demolition of such structures, including a pre-demolition survey conducted by a certified professional. All friable (i.e., crushable by hand) asbestos-containing materials or nonfriable asbestos-containing materials that may be damaged must be abated before demolition in accordance with applicable requirements. Friable asbestos-containing materials must be disposed of as asbestos waste at an approved facility. Nonfriable asbestos-containing materials may be disposed of as nonhazardous waste at landfills that accept such wastes.

Association of Bay Area Governments Hazard Mitigation Plan

The Association of Bay Area Governments' multijurisdictional Local Hazard Mitigation Plan for the San Francisco Bay Area was updated in 2010 in partnership with Bay Conservation and Development Commission Adapting to Rising Tides Program to support local governments in the regional plan for existing and future hazards of climate change. This detailed 5-year plan identifies potential natural and human-made hazards, assesses their potential risks, and includes mitigation methods to reduce risks. The potential hazards identified in the Plan include earthquakes and liquefaction, wildfires, floods, drought, solar storms, dam or levee failure, disease outbreak, freezes, wind, heat, thunder and lightning storms, siltation, tornadoes, hazardous materials, slope failure and mudflows, and other hazards. Similarly, mitigation measures include hazard event planning, emergency preparedness coordination, education, facility upgrades, and monitoring actions.

San Mateo and Santa Cruz Counties Community Wildfire Protection Plan

Virtually all large wildfires in San Mateo County have burned parts of Santa Cruz County as well, including the CZU Lightning Complex Fire in 2020 (CAL FIRE 2021a). Due to the shared nature of the wildfire risk presented by the Santa Cruz Mountains and associated climate conditions, San Mateo and Santa Cruz developed a joint Community Wildfire Protection Plan with input from many organizations, including State and local fire departments, federal agencies, community groups, and land management agencies. The purpose of the Community Wildfire Protection Plan is to help reduce the potential loss of human life and damage to property, natural and cultural resources within both counties due to wildfire. The plan describes the wildfire risk and potential throughout the counties, designates WUI areas, discusses assets at risk throughout the counties, provides mitigation strategies, and discusses resources available (Santa Cruz/San Mateo 2018).

⁵² California Public Utilities Commission (CPUC). 209. Wildfire and Wildfire Safety. https://www.cpuc.ca.gov/industries-and-topics/wildfires (accessed April 2022).

⁵³ California Public Utilities Commission. 2019. CPUC High Fire Threat District (HFTD) [map].

https://capuc.maps.arcgis.com/apps/webappviewer/index.html?id=5bdb921d747a46929d9f00dbdb6d0fa2 (accessed April 2022).

San Mateo County Hazardous Materials Business Plan

Businesses within the City must complete a Hazardous Materials Business Plan (Business Plan) using an electronic reporting system for the safe storage and use of chemicals. Firefighters, health officials, planners, public safety officers, health care providers and others rely on the Business Plan in an emergency. It is used to prevent or lessen damage to the health and safety of people and the environment when a hazardous material is released. The Hazardous Materials Business Plan Program is also known as the Community Right to Know Program and any citizen has the right to review these plans upon request.

San Mateo County Local Hazard Mitigation Plan

The San Mateo County Multijurisdictional Local Hazard Mitigation Plan (LHMP) incorporates wildfire hazard mitigation principles and practices into the routine government activities and functions of the County. The LHMP was adopted in October 2021. LHMP recommends specific actions that are designed to protect people and community assets from losses to those hazards that pose the greatest risk. Mitigation programs and activities identified in the LHMP include fuel reduction and vegetation management, public education and outreach programs, increased training for urban firefighters responding to WUI-area fires, and regional consistency of building code standards.⁵⁴ The San Mateo County LHMP is incorporated by reference into the Safety Element of the Millbrae General Plan.

San Mateo County Emergency Operations Plan

The San Mateo County Office of Emergency Services (OES), a division of the SMCCFD, is responsible for the mitigation, preparedness, planning, coordination of response, and recovery activities related to county emergencies and disasters. The Office serves as the primary coordination point for emergency management's activities affecting more than one jurisdiction, and the unincorporated areas of the county. The OES became an independent county department in January 2019. BFPD is a member agency of the SMCCFD and is subordinate to the OES in a county-level emergency. BFPD is the designated agency for countywide hazardous materials response, and also provides the "first due" responding units to the unincorporated Harbor Industrial Area and portions of San Mateo and San Carlos due to the strategic location of its facilities.

The County's Emergency Operations Plan addresses the planned response to extraordinary emergency situations associated with large-scale disasters, and includes all cities, special districts, and unincorporated areas of the County. The plan aims to provide effective life safety measures and reduce property loss and damage to the environment through management and coordination of emergency response operations through OES, provide for the rapid resumption of services and impacted businesses, and provide accurate documentation for cost recovery efforts.⁵⁵

San Mateo County Code

San Mateo County Fire agencies, including BFPD, universally adopted the 2007 California Fire Code in 2008. Specifically, the County Fire Code consists of Public Resources Code 4291 and CCR Title 14 for defensible space regulations, and CA Building Code Chapter 7A and CA Fire Code Chapter 47 for building standards and regulations.

⁵⁴ San Mateo, County of. 2021. Multijurisdictional Local Hazard Mitigation Plan. https://www.smcgov.org/ceo/2021-multijurisdictionallhmp (accessed April 2022).

⁵⁵ San Mateo, County of. 2015. Emergency Operations Plan – Basic Plan.

https://hsd.smcsheriff.com/sites/default/files/downloadables/1%20-%20Emergency%20Operations%20Plan.pdf (accessed April 2022)

San Francisco International Airport Land Use Compatibility Plan (ALUCP)

The ALUCP for the Environs of San Francisco International Airport (SFO) was prepared according to FAA requirements and adopted by the City/County Association of Governments of San Mateo County (C/CAG) Board of Directors acting as the Airport Land Use Commission for the County of San Mateo, fulfilling California State requirements (California Public Utilities Code, Article 3.5, Section 21670, et seq.). Each ALUCP prevents exposure to excessive noise and safety hazards within an airport influence area over a 20-year horizon and are intended to encourage land uses in the vicinity surrounding an airport that are compatible with the airport land uses. The SFO ALUCP defines the entire city of Millbrae to be within Area A of its Airport Influence Area. Within Area A, State law requires that sellers or lessors of real estate must disclose that the property is located within an airport influence area (California Business and Professional Code Section 11010 and Civil Code Sections 1102.6, 1103.4, and 1353).

Millbrae General Plan

The current Millbrae General Plan contained policies related to hazards, hazardous materials, and wildfire, but they would be replaced by the proposed 2040 General Plan.

3.7.3 Impacts and Mitigation Measures

Significance Criteria

The City of Millbrae utilizes the following 2022 CEQA Guidelines Appendix G significance criteria questions related to hazards/hazardous materials and wildfire.

Would the 2040 General Plan or Specific Plan:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?
- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?
- h) If located in or near State responsibility areas or lands classified as Very High Fire Hazard Severity Zones:

- 1. Substantially impair an adopted emergency response plan or emergency evacuation plan?
- 2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- 3. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- 4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Approach to Analysis

Environmental impacts related to hazards and hazardous materials and wildfire have been assessed using impact significance criteria from federal, State, and local regulations. The impact analysis is based on available literature regarding the existing plans, policies, and resources in the General Plan and Specific Plan areas. Criteria used during this analysis are described below.

Hazards (specific to Hazardous Materials Upset and Exposure Risk)

This evaluation focuses on whether the proposed plans would result in changes to the physical environment that would cause or exacerbate adverse effects related to the use, transportation, disposal, accidental release, or emission of hazardous materials. Potential construction-related and operational impacts from existing hazardous materials in soils, sediments, groundwater, surface water, and structures are evaluated using available information from the Department of Toxic Substances Control and the State Water Resources Control Board.

Hazards (specific to Aviation Safety and Noise Exposure Risk)

The airport safety zones and noise contours for SFO with respect to Millbrae General Plan and Specific Plan areas were utilized to determine potential impacts from exposure to aviation-related hazards and noise.

Wildfire Exposure Risk

The California Department of Forestry and Fire Protection Hazard Severity Maps were consulted in determining Millbrae's proximity to State Responsibility Areas or lands classified as very high fire hazard severity zones. Impacts related to wildfire hazards and risks were evaluated using FHSZ mapping for San Mateo County, aerial imagery, and topographic mapping. Additionally, weather patterns related to prevailing winds and precipitation trends were evaluated as they relate to the spread and magnitude of wildfire. It was assessed whether the proposed plans would risk exacerbating those existing environmental conditions or causing new direct, indirect, or cumulative impacts to other aspects of the environment.

Emergency Evacuation and Response

The City does not have significance thresholds related to emergency access. The City Municipal Code adopts the California Fire Code and amends the code to address local conditions. Therefore, this EIR evaluates the proposed plans using the significance threshold provided by the California Fire Code as follows:

- Multiple-family Residential Projects having more than 100 dwelling units should provide two separated and approved fire apparatus access roads.
- Development of one or two-family dwellings where the number of dwelling units exceed 30 units shall be provided with two separate and approved fire apparatus access roads.
- Provide a fire apparatus access road that has a minimum width of 20 feet with turning radii of 25 feet inside and 45 feet outside.

In addition, the following factors determine whether a plan or project has sufficient access for emergency vehicles, including:

- Location of closest fire stations
- Number of access points (both public and emergency access only)
- Width, height, and turning radius of access points
- Width, height, and turning radius of roadways

The evaluation also includes a determination of whether the changes to the physical environment caused by the proposed plans would impair or interfere with emergency response plans. XXX

Notice of Preparation Comments Approach

This section also addressed comments received in response to the EIR NOP related to airport hazards within airport influence areas and consideration of Biological Safety Levels of development. Assessment of airport influence areas, including development of biotech facilities and associated Biological Safety Levels is discussed under Impact HAZ-3.

Specific Significance Thresholds

For purposes of this analysis, the following thresholds are used to evaluate the significance of hazards/hazardous materials and wildfire impacts resulting from implementation of the proposed plans.

- Routine transport, use, and/or dispose of hazardous materials in a manner that would create a significant hazard to the public or the environment.
- Regular transport of hazardous materials to/from the plan areas on an unsuitable road or use of highly volatile hazardous materials, which would create a significant hazard to the public or the environment.
- Location of new development within 0.25 mile of an existing or proposed school in conjunction with hazardous emissions or handle hazardous materials, waste, or substances.
- Location of new development on a hazardous materials sites lists such as the California Environmental Protection Agency (CalEPA), State Water Board, California Facility Inventory Database (CA FID) UST and State Water Efficiency and Enhancement Program (SWEEP), HAZNET, DTSC EnviroStor, BAAQMD, and/or the State Water Board GeoTracker regulated facilities databases for files related to possible Recognized Environmental Conditions (RECs).
- Location of new development within an airport land use plan or within two miles of a public airport and reduction of safety of people working or residing in the plan areas.
- Impairing implementation of or interfere with an adopted emergency response plan or emergency evacuation plan via blockage of an evacuation route or provision of only one access point for emergency vehicles.

- Placement of housing or offices in a designated WUI zone or proximate to unmanaged open space area that is susceptible to wildfires.
- Impaired implementation of or interference with an adopted emergency response plan or emergency evacuation plan via blockage of an evacuation route or provision of only one access point for emergency vehicles.
- Location of new development in or near area of steep slopes, high-wind areas, or historical wildfire burn areas leading to greater wildfire risk and, thereby, exposing occupants to smoke and other wildfire-related air pollutants.
- Installation or maintenance of roads, fuel breaks, emergency water sources, electrical power lines, or natural gas lines that may exacerbate fire risk.
- Location of new development in or near area of wildfire-scarred slopes or altered drainage areas and, thereby, exacerbating flooding and landslide hazards.

Impact Evaluation

Effects of Hazardous Materials Upset and Exposure

Significance Criterion a:	Would the proposed plans create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
Significance Criterion b:	Would the proposed plans create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
Significance Criterion c:	Would the proposed plans emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Impact HAZ-1 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN COULD RESULT IN THE RELEASE OF POTENTIALLY HAZARDOUS MATERIALS, WHICH MAY OCCUR WITHIN 0.25 MILE OF A SCHOOL. HOWEVER, COMPLIANCE WITH LOCAL, REGIONAL, STATE, AND FEDERAL REGULATIONS RELATED TO HAZARDOUS MATERIALS WOULD MINIMIZE THE RISK OF RELEASES AND EXPOSURE TO THESE MATERIALS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The use of hazardous materials is typically associated with industrial land uses. Activities such as manufacturing, plating, cleaning, refining, and finishing, frequently involve chemicals that are considered hazardous when accidentally released into the environment.

To a lesser extent, hazardous materials may also be used by various commercial enterprises, as well as residential uses. In particular, dry cleaners use cleaning agents considered to be hazardous materials. Hardware stores typically stock paints and solvents, as well as fertilizers, herbicides, and pesticides. Swimming pool supply stores stock acids, algaecides, and caustic agents. Most commercial businesses occasionally use commonly available cleaning supplies that, when used in accordance with manufacturers' recommendations, are considered safe by the State of California, but when not handled properly can be considered hazardous. Private residences also use and store commonly available cleaning materials, paints, solvents, swimming pool and spa chemicals, as well as fertilizers, herbicides, and pesticides.

If improperly handled, hazardous materials can result in public health hazards through human contact with contaminated soils or groundwater, or through airborne releases in vapors, fumes, or dust. There is also the potential for accidental or unauthorized releases of hazardous materials that would pose a public health concern. The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with Federal, State, and local regulations. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous waste transporters are required to complete and carry a hazardous waste manifest, which includes forms, reports, and procedures designed to seamlessly track hazardous waste.

Additional protective regulations apply to projects that could use or disturb potentially hazardous products near or at schools. The California Public Resources Code requires projects that would be located within 0.25 mile of a school and might reasonably be expected to emit or handle hazardous materials to consult with the school district regarding potential hazards. Numerous day care facilities, charter schools, and private schools are also located throughout Millbrae.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

Construction associated with the 2040 General Plan and Specific Plan would primarily consist of infill and redevelopment construction. Infill and redevelopment construction can involve demolition of existing structures. Demolition could result in emission of lead and asbestos if building materials contain these substances. However, lead-based materials and asbestos exposure are regulated by the CalOSHA. CCR Section 1532.1 requires testing, monitoring, containment, and disposal of leadbased materials such that exposure levels do not exceed CalOSHA standards. Under this rule, construction workers (and by extension, neighboring properties) may not be exposed to lead at concentrations greater than 50 micrograms per cubic meter of air averaged over an eight-hour period and exposure must be reduced to lower concentrations if the workday exceeds eight hours. Similarly, CCR Section 1529 sets requirements for asbestos exposure assessments and monitoring, methods of complying with exposure requirements, safety wear, communication of hazards, and medical examination of workers.

The control of asbestos during demolition or renovation of buildings is regulated under the Federal Clean Air Act. The Federal Clean Air Act requires a thorough inspection for asbestos where demolition will occur and specifies work practices to control emissions, such as removing all asbestos-containing materials, adequately wetting all regulated asbestos-containing materials, sealing the material in leak tight containers and disposing of the asbestos-containing waste material as expediently as practicable.⁵⁶ Compliance with applicable standards would ensure impacts related to hazardous materials are less than significant.

Friable ACMs are regulated as a hazardous air pollutant under the Clean Air Act. As a worker safety hazard, they are also regulated under the authority of CalOSHA and by the Bay Area Air Quality Management District. In structures that would be demolished, any ACMs would be abated in accordance with State and Federal regulations prior to the start of demolition or renovation activities and in compliance with all applicable existing rules and regulations, including the Bay Area Air Quality Management District. These programs would ensure that asbestos removal would not

⁵⁶ United States Environmental Protection Agency (USEPA). 2021. Asbestos Laws and Regulations. https://www.epa.gov/asbestos/asbestos-laws-and-regulations (accessed April 2022)

result in the release of hazardous materials to the environment that could impair human health. Therefore, the impact related to ACMs would be less than significant.

Fluorescent lighting ballasts manufactured prior to 1978, and electrical transformers, capacitors, and generators manufactured prior to 1977, may contain PCBs. In accordance with the Toxic Substances Control Act and other federal and State regulations, individual projects would be required to properly handle and dispose of electrical equipment and lighting ballasts that contain PCBs during demolition of older buildings, ensuring that the impact related to PCBs would be less than significant.

The use of construction machinery would involve the transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. Additionally, hazardous materials would be needed for fueling and servicing construction equipment. These types of hazardous materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by County, State, and Federal regulations and compliance with applicable standards discussed in, *Regulatory Framework*, would ensure impacts from construction-related hazardous materials would be less than significant.

Compliance with existing applicable regulations and policies would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials during construction. Oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these substances. There are five schools located within the General Plan area. Four of these schools, as shown in Figure 3.11-2 of Section 3.11, *Public Services and Recreation,* are not located near a hazardous materials transportation route. Lomita Park Elementary, located in the northeastern-most area of the Specific Plan area boundary is located near US Highway 101. While US Highway 101 is located west of the school, transport of hazardous materials along this route would be subject to Federal, state, and local regulations as listed in Section 3.7.3, *Regulatory Framework,* that would reduce potential impacts of releases proximate to schools. Therefore, construction impacts from a hazard to the public or the environment through routine transport, use or disposal of hazardous materials and reasonably foreseeable upset and/or accident conditions, including within 0.25 mile of a school, would be less than significant.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Development facilitated by the 2040 General Plan and Specific Plan would result in the addition of residential units and commercial development throughout Millbrae. Housing and other residential uses do not utilize substantial quantities of hazardous materials, and thereby pose little risk of exposing the public to hazardous materials. Commercial uses would be subject to compliance with CCR, Cal OSHA, and other agencies to ensure hazardous materials risks to the public are minimized during operational use and transport as well.

The proposed plans would facilitate residential development and commercial development in the vicinity of some schools. However, residential and commercial uses would be required to comply with applicable laws and regulations for the handling of hazardous materials. These uses would not emit large quantities of hazardous materials or substances. Development of sites within Millbrae may have pre-existing contamination and would be remediated through coordination with the

appropriate regulatory agency pursuant to federal, State, and local regulations as listed in *Regulatory Framework*.

Compliance with existing applicable regulations and policies would minimize risks from routine use, transport, handling, storage, disposal, and release of hazardous materials. Oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these substances. Additionally, schools located within the Specific Plan area are limited to Lomita Park Elementary in the northeastern-most boundary of the Specific Plan area. While US Highway 101 is located west of the school, transport of hazardous materials along this route would be subject to Federal, state, and local regulations as listed in Section 3.7.3, *Regulatory Framework*, that would reduce potential impacts of releases proximate to schools. Therefore, operational impacts from a hazard to the public or the environment through routine transport, use or disposal of hazardous materials and reasonably foreseeable upset and/or accident conditions, including within 0.25 mile of a school, would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation.

Effects of Location on Hazardous Materials Site

Significance Criterion d: Would the proposed plans be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact HAZ-2 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN COULD RESULT IN DEVELOPMENT ON SITES CONTAMINATED WITH HAZARDOUS MATERIALS. HOWEVER, COMPLIANCE WITH APPLICABLE REGULATIONS RELATING TO SITE REMEDIATION WOULD MINIMIZE IMPACTS FROM DEVELOPMENT ON CONTAMINATED SITES, RESULTING IN A LESS THAN SIGNIFICANT IMPACT.

Construction

Given that potential construction sites are required by DTSC and the Regional Water Quality Control Board to be remediated and/or capped in a manner deemed appropriate by the responsible agency prior to construction activities occurring, construction impacts would be reduced through federal, State, and local regulations. Impacts related to locating buildings within the plan areas on a hazardous materials site per Government Code Section 65962.5 would be less than significant.

Operation

2040 GENERAL PLAN

Existing sites that use or have historically used hazardous materials or that may contain contaminants in soils or groundwater in Millbrae include large- and small-quantity generators of hazardous waste, such as gas stations, dry cleaners, and industrial uses. Specifically, there are seven

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sites containing or potentially containing hazardous materials contamination located in Millbrae, three of which are located along US Highway 101 in the Specific Plan area, two are located west of US Highway 101 outside of the Specific Plan area limits in the southernmost portion of the City, and the last is the Millbrae BART station. Potential development facilitated by the 2040 General Plan on identified hazard sites would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board, the San Mateo County Health Hazardous Materials Division, or DTSC, before any development activities could begin as currently required by federal, State, and local regulations. The agency responsible for oversight would determine the types of remediation and cleanup required and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells onsite with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to workers or future occupants. Compliance with the following 2040 General Plan goals and policies would also apply to future development facilitated by the 2040 General Plan goals and policies would also apply to future development facilitated by the 2040

- **Policy LU-11.1 Environmental Justice Consideration.** The City shall consider potential adverse health and safety impacts associated with land use decisions and reduce negative impacts on residents from hazardous materials, industrial activities, facility locations, and design features.
- **Policy LU-11.4** New Incompatible Uses. The City shall limit the introduction of new incompatible land uses and environmental hazards into existing residential areas.
- Goal HSHM-7 Protect people and the environment from exposure to hazardous materials and minimize risks associated with the use, storage, transport, and disposal of hazardous materials.
 - Policy HSHM-7.1 Contaminated Site Assessment. The City shall require development proposed on a potentially contaminated site to take appropriate steps to assess hazards. If the site is found to be contaminated with hazardous substances, the City shall require the project applicant to take appropriate measures to protect the health and safety of site users and the greater Millbrae community.
 - **Policy HSHM-7.2** Hazardous Materials Education Resources. The City shall continue to provide, and support efforts by San Mateo County to provide, educational resources to residents and businesses that promote best practices for the use, storage, transportation, and disposal of hazardous materials to ensure public safety.
 - Policy HSHM-7.3 Hazardous Materials Management. The City shall require uses, including biotechnology, life science, and industrial uses that involve the handling and use of hazardous materials to adhere to all applicable Federal, State and local regulations for qualifying hazardous materials, seek consultation with the San Mateo County Environmental Health Department, and apply for applicable permits for any regulated substance that may pose a threat to public health and safety or the environment. Compliance with General Plan policies as listed above and compliance with federal, State, and local regulations would continue to apply to development and provide the same level of protection as they do under existing conditions. As the 2040 General

Plan would not increase the likelihood for development of identified hazard sites, impacts would be less than significant.

It is also possible that underground storage tanks (UST) in use prior to permitting and record keeping requirements may be present in the City. If an unidentified UST were uncovered or disturbed during construction activities, it would be removed under permit from the City; if such removal would potentially undermine the structural stability of existing structures, foundations, or impact existing utilities, the tank might be closed in place without removal. Tank removal activities could pose both health and safety risks, such as the exposure of workers, tank handling personnel, and the public to tank contents or vapors. Potential risks, if any, posed by USTs would be minimized by managing the tank according to existing standards contained in Division 20, Chapters 6.7 and 6.75 (UST Program) of the California Health and Safety Code as enforced and monitored by the Environmental Programs Division.

The extent to which groundwater may be affected by an UST or other potential contamination source, if at all, depends on the type of contaminant, the amount released, the duration of the release, distance from source, and depth to groundwater. If groundwater contamination is identified, characterization of the vertical and lateral extent of the contamination and remediation activities would be required by the Regional Water Quality Control Board prior to the commencement of any new construction activities that would disturb the subsurface. If contamination exceeds regulatory action levels, the developer would be required to undertake remediation procedures prior to grading and development under the supervision of the Regional Water Quality Control Board, depending upon the nature of any identified contamination. Compliance with existing State and local regulations would result in the 2040 General Plan not increasing the likelihood for development of identified hazard sites compiled pursuant to Government Code Section 65962.5. Therefore, the 2040 General Plan would not create a hazard to the public or environment during operation, and impacts would be less than significant.

SPECIFIC PLAN

There are three hazardous materials sites located within the Specific Plan area. Development facilitated by the Specific Plan on or near these hazardous materials sites as listed in Table 3.7-1 and shown in Figure 3.7-1 could expose future occupants to hazardous materials. As discussed above, development of identified hazard sites would be preceded by investigation, remediation, and cleanup under the supervision of the Regional Water Quality Control Board, the San Mateo County Health Hazardous Materials Division, or DTSC, before construction activities could begin as currently required by federal, State, and local regulations. The agency responsible for oversight would determine the types of remediation and cleanup required and could include excavation and off-haul of contaminated soils, installation of vapor barriers beneath habitable structures, continuous monitoring wells onsite with annual reporting requirements, or other mechanisms to ensure the site does not pose a health risk to future occupants.

Compliance with General Plan policies as listed above and compliance with federal, State, and local regulations would continue to apply to development and provide the same level of protection as they do under existing conditions. As such, the Specific Plan would not increase the likelihood for development of identified hazard sites compiled pursuant to Government Code Section 65962.5. Therefore, the Specific Plan would not create a hazard to the public or environment during operation, and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation.

Effects of Aviation Hazards

Signific	Significance Criterion e: For a project located within an airport land use plan or, where such a plan	
	has not been adopted, within two miles of a public airport or public use	
	airport, would the proposed plans result in a safety hazard or excessive	
	noise for people residing or working in the plan areas?	

Impact HAZ-3 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN COULD RESULT IN A SAFETY HAZARD OR EXCESSIVE NOISE FROM SAN FRANCISCO INTERNATIONAL AIRPORT FOR PEOPLE RESIDING OR WORKING IN SAFETY ZONES. AS NO FEASIBLE MITIGATION EXISTS TO REDUCE AIRCRAFT NOISE THAT IS GENERATED AT AN ELEVATED POSITION TO AN EXTERIOR AREA, THIS WOULD BE A SIGNIFICANT AND UNAVOIDABLE IMPACT.

Construction

Construction equipment would be required to comply with all ALUCP height limits and other safety requirements. Impacts related to safety hazards and excessive noise for people residing or working the plan areas are limited to operational impacts. No respective construction impacts would occur.

Operation

2040 GENERAL PLAN

Aviation Safety Hazards

The San Francisco International Airport (SFO) is located adjacent to the east of Millbrae. The ALUCP specifies that Millbrae is located entirely within Airport Influence Area A.⁵⁷ The southeastern portion of Millbrae is located partially within Airport Safety Zones 1, 2, 3, and 4. The easternmost portion of Millbrae, east of Bayside Park, is located within Safety Zone 1. South of Millbrae Avenue, Millbrae is located within Safety Zone 2. The southern portion of Millbrae north of Millbrae Avenue and south of Taylor Boulevard is located within Safety Zone 3.

Development facilitated by the proposed plans in this General Plan area would be required to comply with intensities and development regulations as set forth in the SFO ALUCP. In addition, development facilitated by the 2040 General Plan would be required to comply with applicable regional and local regulations. Development facilitated by the 2040 General Plan would be required to comply with the 2040 General Plan goals and policies including the following:

Policy HSHM-6.4 Airport Land Use Compatibility Plan Land Use and Development Consistency. The City shall ensure that all future land use actions and/or associated development conforms to the relevant height, aircraft noise, and

⁵⁷ San Mateo, County of. 2020. SFIA Airport Influence Areas [map]. https://hub.arcgis.com/datasets/smcmaps::sfia-land-use-compatibility-plan-map-layers/explore?layer=2&location=37.600133%2C-122.305886%2C10.57 (accessed April 2022).

safety policies and compatibility criteria contained in the most recently adopted version of the Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.

Compliance with 2040 General Plan Policy HSHM-6.4 and the SFO ALUCP goals and policies would reduce impacts related to aviation safety hazards to less than significant.

Excessive Aviation Noise

SFO's southwest to northeast runway flight paths occur over the city. This runway is not used to the extent of the main runway whose flight path runs perpendicular to the city. The airport noise contours are shown on Figure 3.10-1 in Section 3.10, *Noise*.

A significant impact would occur if a project would expose people residing or working in the project area to excessive noise levels for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport. It should be noted that (since land use changes and development facilitated by 2040 General Plan would be located in the Specific Plan area) 2040 General Plan noise impacts would be related to development in the Specific Plan area, and there would be no impact in this regard outside of the Specific Plan area.

SFO is located adjacent to the east of the city, with the southwest to northeast runway flight paths occurring over the city. This runway is not used to the extent of the main runway whose flight path runs perpendicular to the city. The airport noise contours are shown in Section 3.10, *Noise*. As shown in the figure, these noise contours extend into the eastern part of the city, particularly exposing the residents of the neighborhood surrounding Bayside Manor Park and users of the hotels off Old Bayshore Highway. Sensitive receivers further west into the city may be exposed to elevated noise levels from the airport, however they would not be exposed to airport noise levels 65 CNEL or above. SFO does not provide noise contours for 60 CNEL to 65 CNEL, but it is assumed that the 60 CNEL contour would extend further into the city, covering more areas that contain sensitive receivers. As the City's normally acceptable noise levels are 50 to 60 CNEL for residential, hotels, motels, schools, libraries, museums, hospitals, personal care, meeting halls, churches, office buildings, business commercial, and professional land uses, this would mean that sensitive receivers in the City would be exposed to conditionally acceptable noise levels from SFO. However, implementation of the following policies proposed in the 2040 General Plan would reduce the exposure of sensitive receivers to SFO noise:

- Policy HSHM-6.4 Airport Land Use Compatibility Plan Land Use and Development Consistency. The City shall ensure that all future land use actions and/or associated development conforms to the relevant height, aircraft noise, and safety policies and compatibility criteria contained in the most recently adopted version of the Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.
- Policy HSHM-6.7 Airport Noise Mitigation. The City shall continue to work with the relevant agencies, including the Airport Land Use Commission and the SFO Community Roundtable, to ensure ongoing reduction of airport noise, including low-frequency ground-borne noise.

- **Policy HSHM-6.8 SFO Residential Sound Insulation Program.** The City shall support the continuation of the Residential Sound Insulation Program to reduce the noise impacts for dwellings impacted by aircraft noise 65 dBA or greater. The City shall encourage SFO to fill any gaps that might occur in Federal funding until all eligible homes have been insulated.
- **Policy HSHM-6.9** Low-Frequency Ground-borne Aircraft Noise Mitigation. The City shall require new development to include development and site planning mitigation measures to reduce low-frequency ground-borne noise from inbound and outbound aircraft at SFO.
- Policy HSHM-10.8 Protection from SFO Noise. The City shall discourage outdoor activities or uses in areas within the 70 dBA CNEL contour line of the San Francisco International Airport (as mapped in the Airport Land Use Compatibility Plan) where people could be exposed to hazardous noise levels.
- **Policy HSHM-10.9** Airport Disclosure Notices. The City shall require that all new development comply with real estate disclosure requirements of State law. Section 11010 of the Business and Professions Code requires people offering subdivided property for sale or lease to disclose the presence of all existing and planned airports within two miles of the property (Cal. Bus. and Prof. Code Section 110010(b)(13).
- **Policy HSHM-10.10 Partnering with SFO on Noise Minimization.** The City shall continue to partner with SFO to collaborate on potential mitigation to minimize airport noise within the community, including improvements on the land owned by SFO, to serve as a noise buffer through enhanced landscaping and trees.

As new development of sensitive receivers would occur within parts of the City not within the 65 CNEL or greater airport noise contours, typical architectural materials and insulation efforts as part of policies such as HSHM-6.8 would typically reduce exterior-to-interior noise levels by at least 20 CNEL. Therefore, future interior noise levels of 2040 General Plan development would be expected to not exceed 45 CNEL, and impacts to interior noise levels would be less than significant.

Implementation of proposed Policy HSHM-6.4 would ensure that future projects including noisesensitive receivers is developed in accordance with aircraft noise policies in the Airport Land Use Compatibility Plan for the Environs of SFO. Policy HSHM-6.7 would allow the City to continue working with the ALUC and SFO Community Roundtable to ensure ongoing reduction of airport noise. For residences that experience aircraft noise 65 dBA or greater, Policy HSHM-6.8 would have the City support SFO efforts to complete the Residential Sound Insulation Plan. Policy HSHM-6.9 would be focused on new development being designed to minimize noise from SFO. Implementation of Policy HSHM-10.8 would discourage exposure of sensitive receivers to the 70 CNEL noise contours which only occurs in a small portion of the easternmost part of the City. Policy HSHM-10.9 would be implemented to require that all new development properly disclose the exposure of those residents to aircraft noise. Finally, Policy HSHM-10.10 would have the City coordinate with SFO on airport noise mitigation (similar to Policy HSHM-6.7 and Policy HSHM-6.8). Implementation of these policies would ensure that exterior noise levels from aircraft noise are compatible with City standards to the extent possible; however, due to the exposure of sensitive receivers to high noise levels from an elevated position from aircraft noise, it may not be possible to reduce exterior noise levels from a conditionally compatible noise level to a normally acceptable noise level of 60 CNEL or below. Therefore, exterior noise levels from the airport are potentially

significant. Due to aircraft noise coming from an elevated position to the exterior areas of potential future land uses with noise-sensitive receivers, no feasible mitigation measures exist to reduce exterior noise levels associated with aircraft noise to 60 CNEL or below at future 2040 General Plan or Specific Plan development. The 2040 General Plan operational impact related to consistency with land use compatibility standards would be significant and unavoidable.

SPECIFIC PLAN

Aviation Safety Hazards

SFO is located adjacent to the east of the city; the Specific Plan area is located approximately 1,800 feet west of the airport.

The San Francisco International Airport (SFO) is located adjacent to the east of the city. SFO adopted an ALUCP pursuant to California law to ensure compatibility between the airport and nearby land uses. The ALUCP specifies that the Specific Plan area would be within Airport Influence Area A.⁵⁸ The southeastern portion of the Specific Plan area is located partially within Airport Safety Zones 1 and 2. South of Millbrae Avenue, the city is located within Safety Zone 2. The southern portion of the city north of Millbrae Avenue and south of Taylor Boulevard is located within Safety Zone 3. Development facilitated by the proposed plans in this area would be required to comply with intensities and development regulations as set forth in the ALUCP.

In addition, development facilitated by the proposed plan would be required to comply with the SFO ALUCP, and applicable regional and local regulations. Development facilitated by the project would be required to comply with the City of Millbrae General Plan, and General Plan goals and policies as listed above. Compliance with General Plan goals and policies and the SFO ALUCP goals and policies would reduce impacts related to aviation safety hazards to less than significant.

Excessive Aviation Noise

SFO is located adjacent to the east of the city; the Specific Plan area is located approximately 1,800 feet west of the airport. The airport noise contours are shown in Section 3.10, *Noise*; these contours do not extend into the Specific Plan area. SFO does not provide noise contours for 60 CNEL to 65 CNEL, but it is assumed that the 60 CNEL contour would extend further into the city, including the Specific Plan area. As the City's normally acceptable noise levels are 50 to 60 CNEL for residential, hotels, motels, schools, libraries, museums, hospitals, personal care, meeting halls, churches, office buildings, business commercial, and professional land uses, this would mean that sensitive receivers in the Specific Plan area would be exposed to conditionally acceptable noise levels from SFO. The proposed Specific Plan contains the following policy related to aircraft noise and is the same as 2040 General Plan Policy HSHM-6.4:

Policy LU-15Airport Land Use Compatibility Plan and Land Use Development
Consistency. The City shall ensure that all future land use actions and/or
associated development conforms to the relevant height, aircraft noise, and
safety policies and compatibility criteria contained in the most recently
adopted version of the Airport Land Use Compatibility Plan for the Environs
of San Francisco International Airport.

⁵⁸ San Mateo, County of. 2020. SFIA Airport Influence Areas [map]. https://hub.arcgis.com/datasets/smcmaps::sfia-land-use-compatibility-plan-map-layers/explore?layer=2&location=37.600133%2C-122.305886%2C10.57 (accessed April 2022).

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In addition, 2040 General Plan policies that would address noise land use compatibility within the Specific Plan area include Policies HSMH-6.4 (Airport Land Use Compatibility Plan Land Use and Development, HSMH-6.7 (Airport Noise Mitigation), HSMH-6.8 (SFO Residential Sound Insulation Program), HSMH-6.9 (Low-Frequency Ground-borne Aircraft Noise Mitigation), HSMH-10.8 (Protection from SFO Noise), HSMH-10.9 (Airport Disclosure Notices), and HSMH-10.10 (Partnering with SFO on Noise Mitigation) listed in further detail above.

Implementation of Policy LU-15/Policy HSHM-6.4 would ensure that development facilitated by the Specific Plan, including future noise-sensitive receivers, is consistent with aircraft noise policies in the Airport Land Use Compatibility Plan. Policy HSHM-6.7 would allow the City to continue working with the ALUC and SFO Community Roundtable to ensure ongoing reduction of airport noise. For Specific Plan residences that experience aircraft noise 65 dBA or great, Policy HSHM-6.8 would have the City support SFO efforts to complete the Residential Sound Insulation Plan. Policy HSHM-6.9 would be focused on new Specific Plan development being designed to minimize noise from SFO. Implementation of Policy HSHM-10.8 would discourage exposure of sensitive receivers to the 70 CNEL noise contours which only occurs in a small portion of the easternmost part of the City. Policy HSHM-10.9 would be implemented to require that all new Specific Plan development properly disclose the exposure of those residents to aircraft noise. Finally, Policy HSHM-10.10 would have the City coordinate with SFO on airport noise mitigation (similar to Policy HSHM-6.7 and Policy HSHM-6.8).

As new development of sensitive receivers would occur within parts of the Specific Plan not within the 65 CNEL or greater airport noise contours, typical architectural materials and insulation efforts as part of policies such as HSHM-6.8 would typically reduce exterior-to-interior noise levels by at least 20 CNEL. Therefore, future interior noise levels of 2040 General Plan development would be expected to not exceed 45 CNEL, and impacts to interior noise levels would be less than significant.

Implementation of the aforementioned 2040 General Plan policies would ensure that exterior noise levels at Specific Plan development from aircraft noise are compatible with City standards to the extent possible; however, due to the exposure of sensitive receivers to high noise levels from an elevated position from aircraft noise, it may not be possible to reduce exterior noise levels from a conditionally compatible noise level to a normally acceptable noise level of 60 CNEL or below. Therefore, exterior noise levels at Specific Plan development from the airport are potentially significant. Due to aircraft noise coming from an elevated position to the exterior areas of potential future land uses with noise-sensitive receivers, no feasible mitigation measures exist to reduce exterior noise levels associated with aircraft noise to 60 CNEL or below at future 2040 General Plan or Specific Plan development. Therefore, the 2040 General Plan operational impact related to consistency with land use compatibility standards is significant and unavoidable.

Mitigation Measures

No feasible mitigation is available for aviation noise.

Significance After Mitigation

Significant and unavoidable due to aviation noise.

Emergency Response and Evacuation Plans Consistency

Significance Criterion f: Would the proposed plans impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact HAZ-4 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD RESULT IN ADDITIONAL POPULATION AND VEHICLE MILES TRAVELED IN THE CITY. HOWEVER, THE PROPOSED PLANS WOULD NOT RESULT IN CHANGES TO EMERGENCY EVACUATION ROUTES NOR WOULD SUBSTANTIALLY INCREASE ROADWAY CONGESTION SUCH THAT THE USE OF AN EVACUATION ROUTE WOULD BE HINDERED. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

Potential construction related to implementation of the 2040 General Plan and Specific Plan is expected to entail construction equipment and vehicles that would access and leave the plan areas, which in turn could potentially temporarily impede evacuation or emergency vehicle access. However, as discussed under Impact TRA-4 in Section 3.12, *Transportation*, the proposed plans would result in less than significant impacts related to emergency vehicle access. In addition, the proposed plans would comply with the San Mateo County Emergency Operation Plan and San Mateo County Local Hazard Mitigation Plan, ensuring efficient response to emergency incidents associated with emergencies affecting Millbrae. In addition, future projects that would undergo project-level CEQA review would prepare a construction management plan to ensure adequate transportation circulation and access throughout the construction period. Therefore, construction impacts related to emergency response and evacuation would be less than significant.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

The 2040 General Plan and Specific Plan do not propose physical changes such as realigned or closed-off roadways or changes in general transportation circulation and access that would interfere or impair emergency response or evacuation within or through the plan areas. As such, the proposed plans would also not result in changes to emergency evacuation routes such that use of an evacuation route, including US Highway 101, Interstate 280, and El Camino Real (SR 82), would be hindered.

Development facilitated by the proposed plans would accommodate future population growth and would increase vehicle miles traveled in the City. This could lead to increased roadway congestion during emergency evacuations. However, the City would review and approve projects within the plans areas to ensure that emergency access meets City standards. Development facilitated by the proposed plans would also comply with road standards and are reviewed by the San Mateo Consolidated Fire Department to ensure development would not interfere with evacuation routes and would not impede the effectiveness of evacuation plans.

Development facilitated by the proposed plans would result in population growth in Millbrae. Population growth would incrementally increase traffic that could result in impacts to evacuation routes in Millbrae and overburden adopted evacuation routes and other emergency response resources. Additionally, large concentrations of people could also result in adverse effects related to the implementation of emergency plans, because the increased population may overburden

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adopted evacuation routes and other emergency response resources. However, the management of emergency response and emergency evacuations plans, including the San Mateo County Local Hazard Mitigation Plan and the San Mateo County Emergency Operations Plan as described in Section 3.7.3, *Regulatory Framework*, includes regular updates to these plans that incorporate new or proposed developments, such as the development facilitated by the proposed plans. Thus, development facilitated by the proposed plans would be reflected in the regular and required updates of emergency and evacuation plans applicable to Millbrae. Compliance with emergency and evacuation plans would further ensure that development facilitated by the proposed plans would not result in the impairment of implementation or physical interference with evacuation or emergency response plans.

Therefore, the proposed plans would not impair implementation of or physically interfere with evacuation or emergency response plans. The operational impact related to emergency response and evacuation plans would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Effects of Wildland Fires

Significance Criterion g:	Would the proposed plans expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?
Significance Criterion h:	If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the proposed plans:
	 Substantially impair an adopted emergency response plan or emergency evacuation plan?
	2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
	3. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
	4. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impact HAZ-5 MILLBRAE IS NOT LOCATED WITHIN OR NEAR A VERY HIGH FIRE HAZARD SEVERITY ZONE. COMPLIANCE WITH APPLICABLE CODES AND REGULATIONS WOULD REDUCE THE RISK OF LOSS, INJURY, OR DEATH FROM WILDFIRE FOR NEW DEVELOPMENTS ENCOURAGED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Impacts related to wildland fire hazard risks are limited to operational impacts. No respective construction impacts would occur.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

The General Plan area contains some steep terrain and is located near open space areas in the westernmost portion of the city. The closest open space area is located approximately two miles to the west of the General Plan area, to the west of Interstate 280. Millbrae is not located within or near a Very High Fire Hazard Severity Zone (VHFHSZ). The nearest VHFHSZ is located south of Millbrae in Hillsborough, approximately 3 miles south. And the nearest high fire hazard severity zone in a State Responsibility Area is located to the west of Millbrae across I-280. The Specific Plan area is also not located within VHFHSZ. In addition, the Specific Plan area has not previously experienced wildfire. Given that the Specific Plan area is not located in steep terrain surrounded by natural vegetation, in a previous wildfire burn area, nor consistently experiences high winds, development facilitated by the 2040 General Plan and Specific Plan within the Specific Plan area would not be substantially prone to wildfires.

Although not located in or near VHFHSZ, development facilitated by the 2040 General Plan and Specific Plan would also be subject to the California Fire Code, which includes safety measures to minimize the threat of fire, including noncombustible or ignition-resistant building materials for exterior from the surface of the ground to the roof system and sealing any gaps around doors, windows, eaves, and vents to prevent intrusion by flame or embers. Fire sprinklers would be required in residential developments pursuant to the San Mateo County Code and Chapter 9.30 of the Millbrae Municipal Code. Construction would also be required to meet CBC requirements, including CCR Title 24, Part 2, which includes specific requirements related to exterior wildfire exposure. The Board of Forestry, via CCR Title 14, sets forth the minimum development standards for emergency access, fuel modification, setback, signage, and water supply, which help prevent loss of structures or life by reducing wildfire hazards. Furthermore, San Mateo County implements the San Mateo County EOP, which addresses the response to emergency incidents associated with emergencies affecting San Mateo County. Compliance with such applicable codes and regulations would reduce the risk of loss, injury, or death from wildfire for new residential developments allowed under the proposed plans. As such, the 2040 General Plan and Specific Plan would not exacerbate wildland fire risks. Therefore, operational impacts related to wildland fires risk would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

3.7.4 Cumulative Impacts

The geographic scope of the cumulative hazards, hazardous materials, and wildfire analysis is the General Plan and Specific Plan areas and the vicinity of these plan areas. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Impact Analysis*) located in Millbrae, Burlingame, South San Francisco, and at the San Francisco International Airport in addition to the proposed plans.

Hazardous Materials Exposure Risk

In general, exposure to hazardous materials may cause localized adverse effects. A combination of federal, State, and local regulations limit or minimize the potential for exposure to hazardous materials. Cumulative plans and projects listed in Table 3-1 consists predominantly of general plan buildouts, area plan buildout, and active transportation projects. The types and sizes of development anticipated in the City of Millbrae would not involve large quantities of hazardous materials or activities that transport or handle hazardous materials. In addition, there are no land uses in the vicinity of the plan area that are known to utilize large quantities of hazardous materials or involve hazardous activities. However, cumulative plans and projects may include demolition of structures that have the potential to contain hazardous building materials. Building materials may contain asbestos and lead-based paint. To address potential release of hazardous materials, the City would require applicants to assess structures and impose standard mitigation (required testing, removal, and proper disposal) to minimize release prior to any demolition. As such, there would be a less than significant cumulative impact associated with hazardous materials exposure risk.

Hazards and Emergency Response

The City of Millbrae contains main arterial streets that would act as the most likely routes out of the City and provide access to Highway 101, I-280 or SR-82. The areas surrounding the plans' areas are characterized primarily by urban development, which is not immediately adjacent to any wildlands. The cumulative projects, listed in Table 3-1, would result in predominantly in-fill development. Planned uses are contemplated in the City of Millbrae 2040 General Plan and would not significantly increase emergency services, including wildfires. Furthermore, all construction would adhere to the City Building Codes that are designed to minimize the potential for uncontrolled fires. Once development is proposed, the City would assess the needs for fire protection services and would inform efforts to improve or expand needed facilities. Cumulative plans and projects listed in Table 3-1 would increase population, including employees. Future development in Millbrae, Burlingame, and South San Francisco would result in increased population and could alter the existing street network. However, cumulative development would comply with emergency access requirements as a condition of construction. Cumulative development would also be required to comply with the respective city's regulations and policies regarding emergency access. Trucks necessary to construct cumulative development would utilize truck routes designated by the respective cities and would not conflict with vehicle traffic along city streets. If cumulative development would redesign city streets in such a way that would significantly impact emergency access, they would be required by the respective city to mitigate such impacts. In addition, driveways associated with cumulative development would be constructed in compliance with the California Fire Code and other applicable regulations related to emergency access. Furthermore, the Millbrae 2040 General Plan and Specific Plan would not result in permanent road closures, nor impede an established emergency access route, nor interfere with emergency response requirements. As such, there would be a less than significant cumulative impact associated with hazards and emergency response.

Wildfire Hazards and Emergency/Evacuation Response

A combination of federal, State, and local regulations limit or minimize the potential for exposure to wildfires by reducing the amount of development in wildland urban interface areas, ensuring new development is developed according to California Building Code and Uniform Fire Code, and incorporating requirements for fire-safe construction into the land use planning. The types and sizes of development anticipated in Table 3-1 would not be located in designated and High or Very High Fire Hazard Zones. In addition, plans and projects would be located in areas that are already developed, do not contain significant levels of dry fuel susceptible to ignition, or significantly high average wind speed. Furthermore, cumulative plans and projects would result in predominantly infill development and would not significantly increase emergency services beyond the existing service area. Furthermore, all cumulative project construction would adhere to the City Building Codes that are designed to minimize the potential for uncontrolled fires. Adherence to City Building Codes would ensure that California Fire Code standards such as automatic sprinkler systems are included in development. In addition, as part of project approval for the cumulative projects, the City would assess the need for fire protection services, which would inform efforts to improve or expand needed facilities. In addition, all development would comply with emergency access requirements as directed by the City and fire department regulations. Furthermore, the cumulative projects would not result in permanent road closures, nor impede an established emergency or evacuation access route, such as I-280 or SR-82, or interfere with emergency response requirements, such as fire protection response time standards established by the City of Millbrae 2040 General Plan. As such, there would be a less than significant cumulative impact associated with wildfire hazards and emergency/evacuation response.

Overall Level of Cumulative Significance

Significant and unavoidable.

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3.8 Hydrology and Water Quality

3.8.1 Introduction

This section describes the existing hydrology and water quality setting in the region and General Plan and Specific Plan areas as well as the relevant regulatory framework. This section also evaluates the possible impacts related to hydrology and water quality that could result from implementation of the proposed plans. The information in this section is based on the existing Millbrae General Plan and EIR, Millbrae Urban Water Management Plan, and Millbrae Stormwater Pollution Prevention Plan.

3.8.2 Environmental Setting

Surface Water and Drainage

Surface water "hydrology" refers to how water moves across the surface of land, whereas "stormwater" refers to surface flows that occur in response to storm events. In the General Plan and Specific Plan areas, surface water hydrology is defined by existing development and stormwater management, which is provided through operation and maintenance of the existing stormwater drainage system, comprised of drainage control improvements including but not limited to pipes, culverts, and storage tanks of the stormwater management system.^{1, 2}

General Plan Area

Surface water and drainage within the General Plan area is comprised of six distinct drainage areas, as described in Table 3.8-1.

Drainage Area	Size	Description
Northern Lomita Canal Drainage Area	225 acres	Stormwater runoff in the northern part of the City is conveyed through a system of 42- to 48- inch pipelines to Lomita Creek and the Lomita Canal, from which it is lifted by the Airport Pump Station into the Highline Canal, east of the Bay Area Rapid Transit (BART) tracks.
Southern Lomita Canal Drainage Area	164 acres	This drainage area drains through a piped storm drain system, which in turn flows into the Lomita Creek, which in turn flows into the Lomita Canal at the Landing Lane Bowl. The runoff from this drainage area is lifted by the Airport Pump Station into the Highline Canal, east of the BART tracks.
Central Millbrae Drainage Area	942 acres	This drainage area drains through several storm drainage systems to the Highline Canal. Water from the Bay is prevented from entering the Highline Canal by twin box culverts (near South McDonnell Road), each 15 feet wide by 15 feet tall and outfitted with flap gates to control the flow of runoff from the City into the Bay and not from the Bay to the City. This drainage area also includes the Hillcrest Pump Station which lifts water from the Hillcrest Drive undercrossing under the BART tracks.

Table 3.8-1	Surface Drainage Management Areas
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¹ Millbrae, City of. 2022. Millbrae Downtown and El Camino Real Specific Plan Appendix B: Infrastructure Report. Available: https://www.ci.millbrae.ca.us/home/showpublisheddocument/26300/637909858885600000. Accessed July 2022.

² Millbrae, City of. 2018. Millbrae Storm Drain Master Plan - Final. August. Available: https://www.ci.millbrae.ca.us/departments-services/public-works/administration-engineering/storm-drain-master-plan. Accessed April 2022.

Drainage Area	Size	Description
Millbrae Station Area Specific Plan Drainage Area	67 acres	This drainage area drains through a piped storm drain system to the open channels in the US-101 interchange and then flows into a storm drain to the Cowan Pump Station.
Murchison Drive Drainage Area	430 acres	This drainage area drains through series of storm drains and Millbrae Creek to the El Portal Canal. The El Portal Canal drains to the Bay. Water from the Bay is blocked from entering the El Portal Canal by twin 84-inch diameter culverts (under the Old Bayshore Highway), each with a flap gate.
Mills Estates Drainage Area	130 acres	This drainage area drains through a 45-inch storm drain into a City of Burlingame storm drain system. Runoff flows to the Cowan Pump Station, where it is lifted by the Cowan Pump Station into the El Portal Canal.
Sources:		

Millbrae, City of. 2022. Millbrae Downtown and El Camino Real Specific Plan. June. Appendix B: Infrastructure Report. Available: https://www.ci.millbrae.ca.us/home/showpublisheddocument/26300/637909858885600000. Accessed July 2022. Millbrae, City of. 2018. Millbrae Storm Drain Master Plan - Final. August. Available: https://www.ci.millbrae.ca.us/departmentsservices/public-works/administration-engineering/storm-drain-master-plan. Accessed April 2022.

The General Plan area is predominantly comprised of developed space and impervious surfaces such as concrete, asphalt, and structures through which surface water runoff is not able to infiltrate to the subsurface, which increases surface runoff.

Specific Plan Area

Of the six distinct drainage areas shown on Figure 3.8-1 and in Table 3.8-1, the Specific Plan area is situated within and receives surface water runoff from all but the Mills Estates Drainage Area, which is isolated along the southern boundary of the Specific Plan area.

Stormwater Runoff and Known Flooding Areas

General Plan Area

Within the General Plan area, stormwater runoff generally drains in an east-southeast direction, away from hills located in the west-northwest portion of the General Plan area. As stormwater flows out of the hills in the western portion of Millbrae and onto flatter regions within Millbrae's central and eastern areas, it is conveyed in an existing drainage system comprised of pipelines and limited open ditches or creeks, ultimately discharging to the Bay south of the airport. The City of Millbrae is fully developed, and stormwater runoff is conveyed through the public storm drain system, comprised of pipes, catch basins, pump stations, manholes, and approximately three miles of open creeks and ditches that route surface water runoff through the city to the San Francisco Bay.

Table 3.8-2 summarizes existing flood problem areas, which are portrayed on Figure 3.8-1.³ To address these issues, the City of Millbrae developed a Storm Drain Master Plan⁴ in 2018 to identify the improvements needed to eliminate or reduce flooding problems.

³ Millbrae, City of. 2018. City of Millbrae Storm Drain Master Plan. https://www.ci.millbrae.ca.us/departments-services/public-works/administration-engineering/storm-drain-master-plan. (accessed March 2022).

⁴ Millbrae, City of. 2018. City of Millbrae Storm Drain Master Plan. https://www.ci.millbrae.ca.us/departments-services/public-works/administration-engineering/storm-drain-master-plan. (accessed March 2022).

Map ID #	Location	Description
1	Landing Lane and San Anselmo Ave Neighborhood	Flooding occurs due to the Lomita Canal being overgrown with riparian and aquatic vegetation. Because of the presence of San Francisco Garter Snake habitat, it is difficult for San Francisco Airport staff to obtain permits to adequately maintain the Lomita Canal.
2	MSASP Area near Millbrae Ave and Hwy 101 Interchange	Flooding occurs when inlets become blocked by vegetation and trash from the interchange. The channels are also overgrown with vegetation that contributes to poor drainage and cannot be regularly maintained because of the presence of endangered species. The downstream drainage channel flows to the Cowan Pump Station.
3	East comer of Green Hills Golf Course	Flooding occurs where flow enters a 42-inch storm drain and a 48-inch storm drain flow split structure. The entrance restricts flow entry into the storm drains, contributing to the flooding. The area is also lower than downstream areas of the City.
4	Hillcrest Ave from Minorca Way to El Paseo Ave	At this location, the ground changes from hill slopes to flatter ground, and the original 12- inch-diameter drain was insufficient to deter flooding. The City has improved the storm drain design and capacity to reduce the flooding issues in this area.
5	Taylor School	Flooding has occurred at the school because it has not yet connected to the storm drain system, although there is a 24-inch storm drain stub available.
		Millbrae Storm Drain Master Plan. August. Available: <https: departments-<br="" www.ci.millbrae.ca.us="">ration-engineering/storm-drain-master-plan>. Accessed April 2022.</https:>

Table 3.8-2 Existing Stormwater Drainage Deficiencies and Flooding Problems

As described in Table 3.8-2, flooding problems in the General Plan area are primarily associated with insufficient drainage and existing elevation and topography.

Specific Plan Area

The Specific Plan area is affected by the same flooding problems as the General Plan area, primarily related to poor drainage facilities or a lack of drainage connections in lower-elevation areas. Of the areas of existing problems related to drainage and flooding shown in Figure 3.8-1, the site identified as No. 2, MSASP Area near Millbrae Ave and Hwy 101 Interchange, is located within the Specific Plan area. To address these existing drainage and flooding problems, the City of Millbrae developed a Storm Drain Master Plan⁵ in 2018 that identifies the improvements needed to eliminate or reduce flooding across this and other key areas within Millbrae.

Flood, Tsunami, and Seiche Hazard Areas

General Plan Area

The Federal Emergency Management Agency (FEMA) National Flood Hazard Layer (NFHL) is a geospatial database that contains current effective flood hazard data; these are identified as Special Flood Hazard Areas (SFHAs), which show where flood waters will be in a flood that has a one percent chance of occurring in any given year. The eastern-most portion of the General Plan area is partially identified as being within a SFHA subject to inundation by the 100-year storm, which is the magnitude storm with likelihood of occurring once every 100 years, i.e. the magnitude storm with a one percent chance of occurring during any given year. The primary source of flooding to the General Plan area is the San Francisco Bay during storm events as well as due to sea level rise.

⁵ Millbrae, City of. 2018. Millbrae Storm Drain Master Plan. https://www.ci.millbrae.ca.us/departments-services/publicworks/administration-engineering/storm-drain-master-plan. (accessed March 2022).

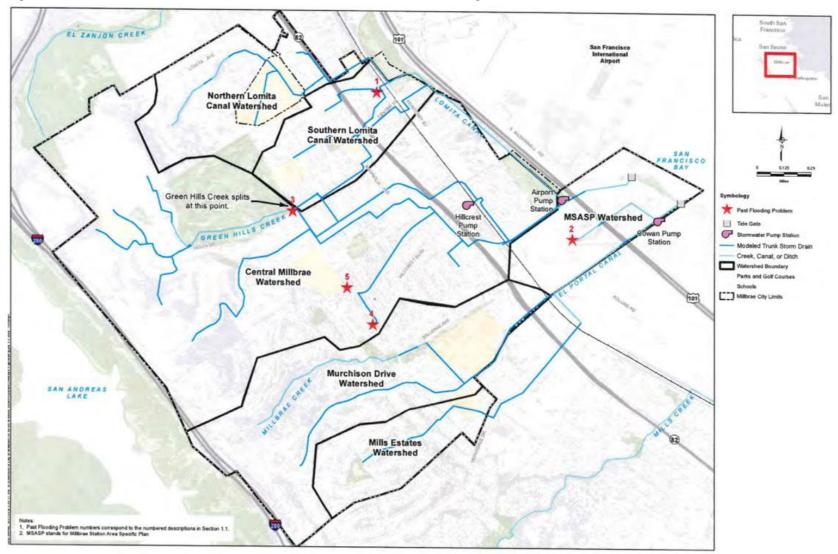


Figure 3.8-1 Millbrae Stormwater Infrastructure and Previous Flooding Problem Areas

Source: Millbrae, City of. 2018. City of Millbrae Storm Drain Master Plan. August. Available: https://www.ci.millbrae.ca.us/departments-services/public-works/administration-engineering/storm-drain-master-plan. Accessed April 2022.

A small portion of the General Plan area along the San Francisco Bay is within a tsunami inundation area; Millbrae is generally protected from tidal flooding by higher ground along the Old Bayshore Highway, on the east, and high banks of one of the two flood control canals, on the south.⁶ The General Plan area is not susceptible to inundation from a seiche on San Andreas Lake; should a seiche event occur, it would not inundate the General Plan area due to the difference in elevation and the intervening topography between the lake and the City.⁷

Specific Plan Area

According to current FEMA delineations, the 100-year event zone is contained within the Specific Plan area. The storm drain system within the Specific Plan area is comprised of a network of 12-inch diameter to 15-inch diameter pipes that carry stormwater to larger trunk lines or directly discharge into adjacent canals. As with the General Plan area at large, the primary source of flooding to the Specific Plan area is the San Francisco Bay.

In addition, no portion of the Specific Plan area is within a tsunami inundation area. The Specific Plan area is not located near the ocean, and as such would not be susceptible to inundation from a tsunami. The Specific Plan area is also not located near a large, enclosed body of water and as such is not susceptible to inundation from a seiche.

Dams and Levees

General Plan Area and Specific Plan Area

The California Department of Water Resources (DWR), Division of Safety of Dams, regulates dam safety. Neither the General Plan area nor the Specific Plan area is located within the mapped inundation area for any existing levees or dams.⁸.

Groundwater

General Plan Area and Specific Plan Area

The General Plan area and Specific Plan are primarily located within the Westside Groundwater Basin, which is a defined groundwater basin identified by DWR as Basin No. 2-035⁹ and characterized by DWR in its Bulletin 118, *California's Groundwater*.¹⁰ Portions of the western-most General Plan and Specific Plan areas also overlie areas that do not overlie any defined groundwater basin; as shown on DWR's online mapping tool, *Groundwater Basin Boundary Assessment Tool*, the Westside Groundwater Basin is not bordered by any defined groundwater basin to the west.¹¹

The Westside Groundwater Basin is identified by DWR as "Very Low Priority" for the purposes of the Sustainable Groundwater Management Act (SGMA). This status indicates that the basin is not in

https://www.ci.millbrae.ca.us/home/showpublisheddocument/154/637322457763770000. Accessed June 2022.

⁶ Millbrae, City of. 1998. City of Millbrae General Plan – Safety Element. Available:

⁷ Ibid.

⁸ DSOD (Division of Dam Safety). 2022. California Dam Breach Inundation Maps. Available: https://fmds.water.ca.gov/maps/damim/. Accessed June 2022.

⁹ The Westside Groundwater Basin (DWR Basin No. 2-035) underlying the project area is separate and distinct from the Westside Subbasin (DWR Basin No. 5-022.09) which is located inland, in Fresno and Kings Counties, and is a subbasin to the larger San Joaquin Valley Groundwater Basin. There is no hydrologic connectivity between the Westside Groundwater Basin in the project area and the Westside Subbasin in the Central Valley. This clarification is offered to avoid confusion associated with the similar nomenclature.

¹⁰ DWR. 2020. California's Groundwater Bulletin 118. Update 2020 Resources. Available: https://water.ca.gov/programs/groundwatermanagement/bulletin-118. Accessed June 2022.

¹¹ DWR. 2022. Groundwater Basin Boundary Assessment Tool. Available: https://gis.water.ca.gov/app/bbat/. Accessed June 2022.

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overdraft conditions, and is not required to be managed under a Groundwater Sustainability Plan (GSP) pursuant to SGMA. However, there are multiple agencies involved in management of the Westside Groundwater Basin, which is primarily within San Mateo County, with a portion of the basin extending north into the City of San Francisco.

The San Francisco Public Utilities Commission (SFPUC) refers to the portion of the basin underlying its jurisdiction as the "North Westside Basin" and addresses this portion of the basin in its Urban Water Management Plan (UWMP)¹². Similarly, the rest of the Westside Groundwater Basin, located within San Mateo County, is commonly referred to as the "south" Westside Groundwater Basin, and is cooperatively managed by the California Water Service Company (serving South San Francisco and Colma), the City of Daly City, and the City of San Bruno, as well as being addressed by the City of Millbrae in its UWMP.¹³ The aforementioned San Mateo County agencies work in coordination with the SFPUC through strategic partnerships to conjunctively operate groundwater management projects and programs within the Westside Groundwater Basin.¹⁴

Surface Water Quality

General Plan Area and Specific Plan Area

The General Plan area and Specific Plan are located within the San Francisco Bay Water Basin Central Bay Subbasin, which is under the jurisdiction of the San Francisco Bay Regional Water Quality Control Board (RWQCB). The San Francisco Bay Basin (Region 2) Water Quality Control Plan (Basin Plan) outlines the beneficial water uses that the State Water Resources Control Board (State Water Board) will protect, water quality objectives, and strategies for achieving these objectives.

Groundwater Quality

General Plan Area and Specific Plan Area

The DWR current Bulletin 118 does not include extensive water quality data for the Westside Groundwater Basin, but characterizes the groundwater quality as having nitrate-nitrogen concentrations that commonly exceed the maximum contaminant level of 10 milligrams per liter.¹⁵ Elevated nitrate-nitrogen concentrations are a common result of urban drainage and septic systems.

SFPUC has also developed data to characterize water quality conditions in the Westside Groundwater Basin, as reported in its 2019 Annual Groundwater Monitoring Report – Westside Basin.¹⁶ SFPUC reports that coastal areas are characterized by chloride and total dissolved solids (TDS) concentrations that are below the recommended and upper-level California secondary maximum contaminant level (SMCL), which is the benchmark developed to protect the aesthetic quality of drinking water (e.g., taste, odor, and appearance);¹⁷ this suggests that the Westside

- ¹³ City of Millbrae. 2021. 2020 Urban Water Management Plan for the City of Millbrae. May. Available:
- https://www.ci.millbrae.ca.us/home/showpublisheddocument/25061/637617870075630000. Accessed July 2022. ¹⁴ Ibid.

¹⁷ Ibid.

¹² SFPUC. 2021. 2020 Urban Water Management Plan for the City and County of San Francisco. Public Review Draft. April. Available: https://www.sfpuc.org/sites/default/files/documents/UWMP%20Public%20Review%20Draft%2004012021%20FINAL.pdf. Accessed July 2022.

¹⁵ DWR. 2006. California's Groundwater Bulletin 118. San Francisco Bay Hydrologic Region – Westside Groundwater Basin. Available: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/2_035_Westside.pdf. Accessed April 2022.

¹⁶ SFPUC. 2020. 2019 Annual Groundwater Monitoring Report – Westside Basin – San Francisco and San Mateo Counties, California. Available: https://sfpuc.org/sites/default/files/documents/WestsideBasin_GW_Monitoring_Annual2019Report_30APR2020.pdf. Accessed July 2022.

Groundwater Basin is not affected by seawater intrusion, which is a primary source of chloride in groundwater. SFPUC also reports that inland portions of the groundwater basin, specifically the Sunset District and Lake Merced areas, are affected by consistently (since 2009) elevated chloride concentrations, as well as nitrate concentrations that have been seasonally elevated above the maximum contaminant level (MCL), which is the regulatory benchmark for drinking water developed to protect human health.¹⁸ The elevated chloride and nitrate concentrations are likely associated with urban drainage, as well as inland agricultural land uses.

3.8.3 Regulatory Framework

Federal Regulations

Clean Water Act

SECTION 404—DISCHARGE OF DREDGE AND FILL OF WATERS OF THE UNITED STATES PERMIT

Section 404 of the Clean Water Act (CWA) regulates temporary and permanent fill and disturbance of wetlands and waters of the United States. Under Section 404, the discharge (temporary or permanent) of dredged or fill material into waters of the United States, including wetlands, typically must be authorized by the United States Army Corp of Engineers (USACE) through either an Individual Section 404 Permit, or a Nationwide Permit under the General Permit for Discharges of Storm Water Associated with Construction Activity (2009-0009-DWQ or 2009-0009-DWQ General Permit).

The performance standard in the Construction General Permit is that dischargers minimize or prevent pollutants in stormwater discharges and authorized non-stormwater discharges through the use of controls, structures, and Best Management Practices (BMPs). A Stormwater Pollution Prevention Plan (SWPPP) must be prepared by a qualified SWPPP developer that meets the certification requirements in the Construction General Permit. The purpose of the SWPPP is (1) to help identify the sources of sediment and other pollutants that could affect the quality of stormwater discharges, and (2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater as well as non-stormwater discharges resulting from construction activity. Operation of BMPs must be overseen by a qualified SWPPP practitioner who meets the requirements outlined in the permit.

In California, Waters of the United States (WOTUS) refer to resources that are subject to jurisdiction of the CWA, with the United States Environmental Protection Agency (USEPA) holding final authority regarding CWA jurisdiction. The definition of WOTUS is currently prescribed by pre-2015 regulations, as directed by an August 2021 order of the U.S. District Court for the District of Arizona, which vacated and remanded the Navigable Waters Protection Rule (*Pascua Yaqui Tribe v. U.S. Environmental Protection Agency*). Accordingly, the 2015 Clean Water Rule¹⁹ is no longer in effect, and has been replaced by the pre-2015 Regulatory Definition of WOTUS,²⁰ as presented below.

¹⁸ Ibid.

¹⁹ USEPA (United States Environmental Protection Agency) and USACE (United States Army Corps of Engineers). 2015. Clean Water Rule: Definition of "Waters of the United States," 80 Federal Regulation 37053. June 29. Available: https://www.govinfo.gov/content/pkg/FR-2015-06-29/pdf/2015-13435.pdf. Accessed April 2022.

²⁰ USEPA. 2021. Current Implementation of Waters of the United States. Last updated on December 20. Available: https://www.epa.gov/wotus/current-implementation-waters-united-states#Pre-2015. Accessed July 2022.

- 1) All waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
- 2) All interstate waters, including interstate wetlands;
- 3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including any such waters:
 - a. Which are or could be used by interstate or foreign travelers for recreational or other purposes; or
 - b. From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or
 - c. Which are used or could be used for industrial purposes by industries in interstate commerce;
- 4) All impoundments of waters otherwise identified as waters of the United States under this definition;
- 5) Tributaries of waters identified in paragraphs (s)(1) through (4) of this section;
- 6) The territorial sea;
- 7) Wetlands adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (s)(1) through (6) of this section; waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA (other than cooling ponds as defined in 40 CFR 423.11(m) which also meet the criteria of this definition) are not waters of the United States.
- 8) Waters of the United States do not include prior converted cropland.

In addition, the pre-2015 Regulatory Definition of WOTUS is directed by the Supreme Court's 2006 decision in *Rapanos v. U.S.* to exclude from WOTUS any waterbody through which water flows only intermittently or ephemerally, and to only include wetlands in WOTUS if the wetland has a "continuous surface connection" to waters that are navigable or that could reasonably be so made. Justice Kennedy also wrote a concurrence with the Rapanos decision, and further specified that each water should be determined on a case-by-case basis, and that jurisdiction should be based on whether the water in question has a "significant nexus" to a water that has been used for interstate commerce. For wetlands, a significant nexus would exist if the wetlands "significantly affect the chemical, physical, and biological integrity" of another WOTUS.

The CWA Section 404 regulations extended WOTUS protection to wetlands; however, based upon the variability (non-static condition) of wetlands, and the "significant nexus" requirement defined by Justice Kennedy and applicable as part of the pre-2015 Regulatory Definition of WOTUS, the defining of wetlands as WOTUS is limited to features that are "adjacent, contiguous, or neighboring" to WOTUS; these may include emerging marshes, forested wetlands, floodplain depressions, and fringe habitats. Section 404(b)(1) Guidelines require that USACE may only permit discharges of dredged or fill material into WOTUS when such discharge represents the Least Environmentally Damaging Practicable Alternative (LEDPA) available; the federal agency must have completed analysis of the LEDPA prior to issuing the required CWA permit for the project.

SECTION 303—WATER QUALITY STANDARDS AND TOTAL MAXIMUM DAILY LOADS

Under Section 303 of the CWA, states are required to adopt water quality standards for all surface waters of the United States based on the water body's designated beneficial use. Where multiple uses exist, water quality standards must protect the most sensitive use. Water quality standards are typically numeric, although narrative criteria based on biomonitoring methods may be employed where numerical standards cannot be established or where they are needed to supplement numerical standards.

CWA Section 303(d) requires States and authorized Native American tribes to develop a list of water quality impaired segments of waterways. The list includes waters that do not meet water quality standards necessary to support a waterway's beneficial uses even after the minimum required levels of pollution control technology have been installed. Listed water bodies are to be priority ranked for development of a Total Maximum Daily Load (TMDL). A TMDL is a calculation of the total maximum daily load (amount) of a pollutant that a water body can receive on a daily basis and still safely meet water quality standards. The TMDLs include waste load allocations for urban stormwater runoff as well as municipal and industrial wastewater discharges, with allocations apportioned for individual Municipal Separate Storm Sewer Systems (MS4s) and wastewater treatment plants, including/not including those in San Mateo County.

SECTION 401—WATER QUALITY CERTIFICATION

Section 401 of the CWA (33 United States Code [USC] 1341) requires any applicant for a federal license or permit to conduct any activity that may result in a discharge of a pollutant into waters of the United States to obtain a certification that the discharge will comply with the applicable state water quality standards. Specifically, under CWA Section 401, an applicant for a Section 404 permit (to discharge dredged or fill material into waters of the United States) must first obtain a certification from the appropriate agency stating that the discharge is consistent with the State's water quality standards and criteria. In California, the SWRCB delegates authority to either grant water quality certification or waive the requirements to the nine RWQCBs. The proposed plan areas are located within the San Francisco Bay RWQCB's jurisdiction.

SECTION 402—NATIONAL POLLUTION DISCHARGE ELIMINATION SYSTEM PERMIT

Under Section 402(d) of the CWA, the nine RWQCBs administer the NPDES program on behalf of the USEPA. The objective of the NPDES program is to control and reduce levels of pollutants in water bodies from discharges of municipal and industrial wastewater and stormwater runoff. CWA Section 402(d) establishes a framework for regulating nonpoint-source stormwater discharges (33 USC 1251). As discussed above under Section 404, discharges of pollutants to receiving water are prohibited unless the discharge complies with an NPDES permit specifying discharge prohibitions, effluent limitations, and other provisions such as monitoring necessary to protect water quality based on criteria specified in the National Toxics Rule, the California Toxics Rule, and the Basin Plan.

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) oversees floodplains and administers the National Flood Insurance Program (NFIP) under the National Flood Insurance Act of 1968. The NFIP makes federally subsidized flood insurance available to property owners within communities who participate in the program. FEMA defines areas of special flood hazard, or "Flood Hazard Areas," as those areas that are subject to inundation by a 100-year flood event, or the magnitude flood with a one percent chance to occur in any given year, or approximately once every 100 years. Flood Hazard

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Areas are defined on regulatory flood maps titled Flood Insurance Rate Maps (FIRMs). The NFIP mandates that development cannot occur within a Flood Hazard Area if that development results in more than a one-foot increase in flood elevation. In addition, development is not allowed in delineated floodways within the regulatory floodplain.

National Pollutant Discharge Elimination Program

Pursuant to Section 402 of the CWA and the Porter-Cologne Water Quality Control Act, municipal stormwater discharges in the City of Millbrae are regulated under the San Francisco Bay Region Municipal Regional Stormwater Issuing Waste Discharge Requirements and NPDES Permit, Order No. R2-2015-0049, NPDES Permit No. CAS612008, adopted October 14, 2009, and revised November 19, 2015.

NPDES Provision C.3 addresses post-construction stormwater management requirements for new development and redevelopment projects that add and/or replace 10,000 square feet or more of impervious area. Provision C.3 requires the incorporation of site design, source control, and stormwater treatment measures into development projects in order to minimize the discharge of pollutants in stormwater runoff and non-stormwater discharges and to prevent increases in runoff flows. Low Impact Development (LID) methods are to be the primary mechanism for implementing such controls. NPDES Provision C.3(g) pertains to hydromodification management requirements. This NPDES Permit provision requires five Control Design Criteria to be implemented: range of flows to control, goodness of fit criteria, allowable low flow rate, standard hydromodification modeling, and alternate hydromodification modeling and design. As noted above, projects disturbing more than 1 acre of land during construction are required to comply with the NPDES Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ, NPDES No. CAS000002 (Construction General Permit). The RWQCB regulates Construction General Permit activities at a local level.

To obtain coverage under the Construction General Permit, a project applicant must provide a Notice of Intent, a SWPPP, and other documents required by Attachment B of the Construction General Permit. Activities subject to the Construction General Permit include clearing, grading, and disturbances to the ground, such as grubbing or excavation. This permit also covers linear underground and overhead projects such as pipeline installations.

The Construction General Permit uses a risk-based permitting approach and mandates certain requirements based on the project risk level (Level 1, Level 2, or Level 3). The project risk level is based on the risk of sediment discharge and the receiving water risk. The sediment discharge risk depends on project location and timing (such as wet season versus dry season activities). The receiving water risk depends on whether the project would discharge to sediment-sensitive receiving water. The determination of the project risk level would be made by project applicants when the Notice of Intent is filed (and more details of the ultimate timing of the construction activity are confirmed).

The performance standard in the Construction General Permit is that dischargers minimize or prevent pollutants in stormwater discharges and authorized non-stormwater discharges through the use of controls, structures, and Best Management Practices (BMPs). A SWPPP must be prepared by a qualified SWPPP developer that meets the certification requirements in the Construction General Permit. The purpose of the SWPPP is (1) to help identify the sources of sediment and other pollutants that could affect the quality of stormwater discharges, and (2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater as

well as non-stormwater discharges resulting from construction activity. Operation of BMPs must be overseen by a qualified SWPPP practitioner who meets the requirements outlined in the permit.

National Toxics Rule and California Toxics Rule

In 1992, the EPA promulgated the National Toxics Rule under the CWA to establish numeric criteria for priority toxic pollutants for 14 states to bring all states into compliance with the requirements of CWA Section 303(c)(2)(B). The National Toxics Rule established water quality standards for 42 pollutants not covered under California's Statewide water quality regulations at that time. As a result of the court-ordered revocation of California's Statewide basin plans in September 1994, the EPA initiated efforts to promulgate additional federal water quality standards for California. In May 2000, the EPA issued the California Toxics Rule, which includes all the priority pollutants for which the EPA has issued numeric criteria not included in the National Toxics Rule.

Federal Executive Order 11988

Executive Order 11988, "Floodplain Management," directs all federal agencies to avoid, to the extent possible, long- and short-term adverse impacts of occupancy and modification of floodplains, and to avoid supporting development in a floodplain either directly or indirectly wherever there is a practicable alternative. Title 23 of the Code of Federal Regulations 650, Subpart A, "Location and Hydraulic Design of Encroachment on Floodplains" specifies applicable floodplain regulations.

FEMA also administers the NFIP, a federal program that enables property owners in participating communities to purchase insurance as protection against flood losses in exchange for state and community floodplain management regulations that reduce future flood damages.

State Regulations

California Porter Cologne Water Quality Control Act

The State of California is authorized to administer federal or State laws regulating water pollution within the State. The Porter-Cologne Water Quality Control Act (Water Code §13000, et seq.) includes provisions to address requirements of the CWA. These provisions include NPDES permitting, dredge and fill programs, and civil and administrative penalties. The Porter-Cologne Act is broad in scope and addresses issues relating to the conservation, control, and utilization of the water resources of the State. Additionally, the Porter-Cologne Act states that the quality of all the waters of the State, including groundwater and surface water, must be protected for the use and enjoyment by the people of the State.

In California, the NPDES program is administered by the SWRCB through the RWQCBs and requires municipalities to obtain permits that outline programs and activities to control wastewater and stormwater pollution. The federal CWA prohibits discharges of stormwater from construction projects unless the discharge is in compliance with an NPDES permit. The SWRCB is the permitting authority in California, which adopted an NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, otherwise known as the Construction General Permit (Order 2009-0009, as amended by Orders 2010-0014-DWQ and 2012-006-DWQ). The Order applies to construction sites that include one or more acre of soil disturbance. Construction activities include clearing, grading, grubbing, excavation, stockpiling, and reconstruction of existing facilities involving removal or replacement. The Construction General Permit requires that the landowner and/or contractor file permit registration documents prior to commencing construction. These documents include a notice of intent, risk assessment, site map,

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stormwater pollution prevention plan (SWPPP), and signed certification statement. The SWPPP must include measures to ensure that: all pollutants and their sources are controlled; non-stormwater discharges are identified and eliminated, controlled, or treated; site Best Management Practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges; and BMPs installed to reduce or eliminate pollutants after construction are completed and maintained. The Construction General Permit specifies minimum BMP requirements for stormwater control based on the risk level of the site. The Permit also specifies minimum qualifications for a qualified SWPPP developer and qualified SWPPP practitioner.

California Code of Regulations (Wetlands and Waters Definition)

The State Water Board indicates that no single accepted definition of wetlands exists at the State level, and that the RWQCBs may have different requirements and levels of analysis with regard to the issuance of water quality certifications. Generally, an area is a wetland if, under normal circumstances:

- (1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both;
- (2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and
- (3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.

Under California State law, waters of the State means "any surface water or groundwater, including saline waters, within the boundaries of the state." As such, water quality laws apply to both surface water and groundwater. After the U.S. Supreme Court decision in *Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers* (53 USC 159), the Office of Chief Counsel of the State Water Board released a legal memorandum confirming the State's jurisdiction over isolated wetlands. The memorandum stated that under the California Porter-Cologne Water Quality Control Act (Porter-Cologne), discharges to wetlands and other waters of the State are subject to State regulation, and this includes isolated wetlands. In general, the State Water Board regulates discharges to isolated waters in much the same way as it does for waters of the United States, using Porter-Cologne rather than CWA authority.

California Industrial General Stormwater Permit

The Statewide Stormwater NPDES permit for general industrial activity (Order 2014-0057-DWQ, superseding Order 97-03-DWQ) regulates discharges associated with 10 broad categories of industrial activities, such as operation of wastewater treatment works, and with recycling facilities. The industrial general permit requires the implementation of Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology to achieve performance standards. The permit also requires development of a SWPPP that identifies the site-specific sources of pollutants and describes the measures at the facility applied to reduce stormwater pollution. A monitoring plan is also required.

California NPDES Stormwater Permit

In November 1990, the EPA published regulations establishing NPDES permit requirements for municipal and industrial stormwater discharges. Phase I of the permitting program applied to municipal discharges of stormwater in urban areas where the population exceeded 100,000

persons. Phase II of the NPDES stormwater permit regulations, which became effective in March 2003, required that NPDES permits be issued for construction activity for projects disturbing 1–5 acres. Phase II of the municipal permit system (known as the NPDES General Permit for Small MS4s, Order No. 2003-0005-DWQ as amended by 2013-0001-DWQ) required small municipalities of fewer than 100,000 persons to develop stormwater management programs. This permit authorizes discharges of stormwater and some categories of non-stormwater that are not "significant contributors of pollutants."

Provision C.3 in the Municipal Regional Permit requires site designs for new developments and redevelopments to minimize the area of new roofs and paving and treat runoff, and in some cases, control the rates and durations of site runoff. Where feasible, pervious surfaces should be used instead of paving so that runoff can infiltrate to the underlying soil. Runoff should be dispersed to landscaping where possible. Remaining runoff from impervious areas must be treated using bioretention. In some developments, the rates and durations of site runoff must also be controlled.

The C.3 requirements are separate from, and in addition to, requirements for erosion and sediment control and for pollution prevention measures during construction. In addition, project applicants must execute agreements to allow municipalities to verify that stormwater treatment and flow-control facilities that are approved as part of new development are maintained in perpetuity.

California Toxics Rule and State Implementation Policy

The California Toxics Rule, presented in 2000 in response to requirements of EPA's National Toxics Rule, establishes numeric water quality criteria for approximately 130 priority pollutant trace metals and organic compounds. The California Toxics Rule criteria are regulatory criteria adopted for inland surface waters, enclosed bays, and estuaries in California that are on the CWA Section 303(c) list for contaminants. The California Toxics Rule includes criteria for the protection of aquatic life and human health. Human health criteria (water- and organism-based) apply to all waters with a Municipal and Domestic Water Supply beneficial use designation as indicated in the basin plans. The Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California, also known as the State Implementation Policy, was adopted by the State Water Board in 2000. It establishes provisions for translating the California Toxics Rule criteria, National Toxics Rule criteria, and basin plan water quality objectives for toxic pollutants into:

- NPDES permit effluent limits;
- Effluent compliance determinations;
- Monitoring for 2,3,7,8-tcdd (dioxin) and its toxic equivalents;
- Chronic (long-term) toxicity control provisions;
- Site-specific water quality objectives; and
- Granting of effluent compliance exceptions.

The goal of the State Implementation Plan is to establish a standardized approach for permitting discharges of toxic effluent to inland surface waters, enclosed bays, and estuaries throughout the State.

California Sustainable Groundwater Management Act

In September 2014, California Governor Jerry Brown signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable

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Groundwater Management Act (SGMA) gives local agencies the power to sustainably manage groundwater and requires GSPs to be developed for Medium- and High-Priority groundwater basins, as defined by the DWR. Millbrae is underlain by the Westside Groundwater Basin, which is identified by DWR as being Very Low Priority, and, therefore, does not require implementation of a GSP for compliance with SGMA. This groundwater basin is actively managed by San Mateo County agencies including the California Water Service Company (serving South San Francisco and Colma), the City of Daly City, the City of San Bruno, and the City of Millbrae, as well as the SFPUC, for the northern-most portion of the basin which extends into the City and County of San Francisco.

Regional and Local Regulations

San Francisco Bay Regional Water Quality Control Plan

The San Francisco Bay RWQCB implements the Basin Plan, a master policy document for managing water quality in the region. The Basin Plan establishes beneficial water uses for waterways and water bodies within the region. The San Francisco Bay RWQCB has jurisdiction over the City of Millbrae. Individual RWQCBs function as the lead agencies responsible for identifying, monitoring, and cleaning up leaking underground storage tanks (USTs). Storage of hazardous materials in USTs is regulated by the State Water Board, which oversees all nine of the RWQCBs.

San Francisco Bay Region Municipal Stormwater Permitting Program

The San Francisco Bay Region Municipal Stormwater NPDES Permit, Order No. R2-2015-0049 (MRP) issues the Waste Discharge Requirements and NPDES Permit for the discharge of stormwater runoff from the municipal separate storm sewer systems (MS4s) of over 70 municipalities, including Millbrae, and local agencies in five Bay Area counties²¹. Under the MRP, permittees are prohibited from non-stormwater discharges into storm drain systems and watercourses. Permitted discharges must not cause or contribute to a violation of any applicable water quality standard for receiving waters. Upon a determination by either the MRP permittee(s) or the RWQCB that discharges are causing or contributing to an exceedance of an applicable water quality standards, the permittee(s) must notify, within no more than 30 days, and thereafter submit a report to the RWQCB. The report must describe controls or best management practices (BMPs) that are currently being implemented, and the current level of implementation, to prevent or reduce the discharge of pollutants that are causing or contributing to the exceedance of water quality standards. The MRP also sets forth requirements for monitoring water quality.

Provision C.3 of the MRP establishes discharge requirements for new development and redevelopment projects. The goal of Provision C.3 is for the MRP permittees to use their planning authorities to include appropriate source control, site design, and stormwater treatment measures in new development and redevelopment projects to address stormwater runoff pollutant discharges and prevent increases in runoff flows from new development and redevelopment projects. According to the MRP, this goal is to be accomplished primarily through the implementation of low impact development (LID) techniques.

²¹ State Water Resources Control Board (SWRCB). 2015. San Francisco Bay Region Municipal Regional Stormwater NPDES Permit. https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/stormwater/Municipal/R2_2015_0049_amended.pdf. (accessed March 2022).

Millbrae General Plan

The current Millbrae General Plan contained policies related to hydrology and water quality, but they would be replaced by the proposed 2040 General Plan.

Millbrae 2020 Urban Water Management Plan

The City, as required by the California Water Code (CWC), supplies water to either 3,000 customers or supplies a total annual volume in excess of 3,000 acre-feet per year. As of the fiscal year 2020, the City of Millbrae supplied water to 6,591 municipal water connections and was required to complete an UWMP. The Millbrae 2020 UWMP was published in May 2021 and reports the City's water demand and uses for a 20-year planning period. In addition, it discusses the water supply system, current and projected water use, water supply reliability, demand management measures, water shortage contingency planning, and plan implementation.

Millbrae Stormwater Pollution Prevention Program

The Millbrae Stormwater Pollution Prevention Program is designed to protect the City's storm drain and system and the San Francisco Bay²². The program aims to prevent litter, debris, and toxic chemicals from entering storm drains that may prove harmful to the environment. This program is designed to meet requirements of the City's Municipal Regional Stormwater Permit (MRP) and National Pollutant Discharge Elimination System (NPDES) Permits, Orders, and Amendments. Pollutants of Concern are the primary targets of reportable outreach and enforcement efforts, which include identifying sources, taking action to reduce sources, and measuring the success of activities.

Millbrae Municipal Code

The City of Millbrae Municipal Code contains all ordinances for the city. The Municipal Code is organized by Title, Chapter, and Section. The following provisions of Title 6, Sanitation and Health, Title 8, Public Works, and Title 9, Building Regulations, of the Municipal Code help to minimize adverse effects to water supply as a result of development in Millbrae.

CHAPTER 4.65 HAZARDOUS MATERIALS STORAGE

The purpose of this chapter is the protection of health, life, resources, and property through prevention and control of unauthorized discharges of hazardous materials.

CHAPTER 6.20 MUNICIPAL SERVICES

The purpose of this chapter is to regulate the provision of municipal services, including collection of garbage and rubbish, and water and sewer services.

CHAPTER 8.05 WATER SERVICE

This chapter is known as Millbrae's "Water Service Ordinance." It provides rules and regulations for the construction and use of water service or water systems, including installation, alteration and repair of such facilities within or connecting to the City's water service or system.

²² Millbrae, City of. 2022. City of Millbrae Stormwater Pollution Prevention Program. Available:

https://www.ci.millbrae.ca.us/departments-services/public-works/water-pollution-control-plant/pollution-prevention-program/stormwater-program. Accessed March 2022.

CHAPTER 8.10 BACKFLOW AND CROSS-CONNECTION CONTROL PROGRAM

The purpose of this chapter is to protect the public potable water supply of Millbrae from the possibility of contamination or pollution due to backflow or cross-connection.

CHAPTER 8.20 MUNICIPAL SANITARY SEWER SYSTEM

The purpose of this chapter is to provide for, preserve and protect the public health, safety and general welfare of the citizens of Millbrae, including by:

- 1. Preventing the introduction of pollutants into the Publicly Owned Treatment Works (POTW) that will interfere with its operation;
- 2. Preventing the introduction of pollutants into the POTW that will pass through the POTW inadequately treated into receiving waters or that are otherwise incompatible with the POTW;
- 3. Protecting the general public and POTW personnel who are exposed to wastewater and sludge in the course of their employment; and
- 4. Promoting reuse and recycling of industrial wastewater and sludge from the POTW.

CHAPTER 8.45 WATER CONSERVATION

This chapter outlines the policies, regulations, prohibitions and restrictions regarding the use of water for all customers in the City. It sets out water use and conservation goals by implementing the City's Urban Water Management Plan. Pursuant to the Water Conservation in Landscaping Act, the "model" water efficient landscape ordinance adopted by the DWR is enforceable within the City.

CHAPTER 9.70 DRAINAGE CONNECTION TO SEWERS

This chapter prohibits any person, persons, firm, or corporation to cause or permit any water that may accumulate on the roof of any building or on or in any land in the City to flow into any sanitary sewer in said city, by means of any drainpipe or pipes from such building or from such land.

3.8.4 Impacts and Mitigation Measures

Significance Criteria

The City of Millbrae utilizes the following 2022 CEQA Guidelines Appendix G significance criteria questions related to Hydrology and Water Quality.

Would the 2040 General Plan or Specific Plan:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
- b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - 1. result in a substantial erosion or siltation on- or off-site?
 - 2. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

- 3. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
- 4. impede or redirect flood flows?
- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
- e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Approach to Analysis

Hydrology and Water Quality

Impacts related to hydrology and water quality were determined by reviewing information regarding regional and local hydrology, climate, topography, and geology contained in the existing General Plan and EIR, San Francisco Bay RWQCB Basin Plan, FEMA FIRMs, and the proposed Specific Plan Appendix B (Infrastructure Report). Evaluation of impacts is based on comparison of existing conditions to the anticipated built condition under the proposed plans, such as changes in impervious area and facilities located within flood zones. Specifically, the impact evaluation focuses on effects on surface and groundwater quality, groundwater supply, and drainage (in terms of erosion, siltation, flooding, stormwater system exceedance, and polluted runoff). Water quality conditions are compared with water quality standards and WDRs by identifying potential contaminants and pollution pathways, amount of impervious area, and runoff treatment requirements. Finally, as part of the analysis, inundation and flooding in the General Plan and Specific Plan areas are assessed by reviewing potential inundation zone elevations relative to the General Plan and Specific Plan areas.

Impacts related to water supply availability and adequacy of wastewater conveyance and treatment are discussed in Section 3.13, *Utilities and Service Systems*. Impacts related to wetlands and waters of the United States are discussed in Section 3.3, *Biological, Agriculture, and Forestry Resources*.

EIR Scoping Comments Consideration

This section also addresses written comments received in response to the EIR NOP related to groundwater dynamics, flooding, and stormwater quality, as well as a verbal comment received during the EIR public scoping meeting regarding flooding risk and sea level rise. Assessment of groundwater quality is addressed under Impact HYD-1, groundwater recharge is addressed under Impact HYD-2, stormwater quality is addressed under Impact HYD-3, and flooding, including policies related to sea level rise, is discussed under Impacts HYD-3 and HYD-4.

Specific Thresholds of Significance

For purposes of this analysis, the following thresholds are used to evaluate the significance of Hydrology and Water Quality impacts resulting from implementation of the proposed plans.

- Violate any water quality standards or waste discharge requirements established by a regulatory body with jurisdiction over the plan area.
- Deplete groundwater supplies or interfere with groundwater recharge such that the proposed plan would impede or obstruct goals and policies of a groundwater management plan.
- Alter an existing drainage pattern through alteration of the course of a stream or river or increased impervious surfaces and resulting in erosion, siltation, or flooding on or off-site.

- Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
- Expose people to pollutants due to inundation related to flooding, tsunami, or seiche.
- Conflict with a water quality control plan or sustainable groundwater management plan such goals would be obstructed.

Impact Evaluation

Effects to Surface and Groundwater Quality

Significance Criterion a:	Would the proposed plans violate any water quality standards or waste
	discharge requirements or otherwise substantially degrade surface or
	ground water quality?

Impact HYD-1 IMPLEMENTATION OF THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD INVOLVE GROUND-DISTURBING ACTIVITIES DURING CONSTRUCTION THAT COULD TEMPORARILY INCREASE THE POTENTIAL FOR WATER QUALITY TO BE AFFECTED BY SEDIMENTATION OR AN ACCIDENTAL SPILL OR RELEASE OF HAZARDOUS MATERIALS. HOWEVER, WITH ADHERENCE TO APPLICABLE WATER QUALITY STANDARDS AND WASTE DISCHARGE REQUIREMENTS, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN

Construction activities would involve ground-disturbing activities, and the use of heavy equipment and machinery that could increase the potential for water quality degradation to occur as a result of soil erosion or sedimentation, or an accidental spill or release of hazardous materials such as oils, fuels, paints, and solvents. Earth-moving activities during construction could include excavation and trenching, soil compaction and moving, cut and fill activities, and grading. Due to the primarily builtup nature of the General Plan area, future development would primarily occur as infill and would not disturb previously undisturbed areas in compliance with waste discharge requirements.

Individual construction activities that disturb one or more acres of land surface would be subject to the NPDES Construction General Permit adopted by the SWRCB and implemented by the nine RWQCBs. Construction permit conditions would require development of a SWPPP, which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-storm water management controls. Inspection of construction sites before and after storms would be required to identify stormwater discharge from construction activity and to identify and implement erosion controls, where necessary. Adherence to the requirements of the NPDES program and SWPPP for individual projects would reduce the potential for new construction under the 2040 General Plan to cause water quality standards to be exceeded.

In addition, construction activities would be implemented in accordance with the applicable goals and policies of the General Plan, including those policies presented below under Goal NRC-2, for the protection of surface water and groundwater quality:

Goal NRC-2 Improve water quality by protecting surface water resources and restoring creeks and rivers to their natural state

- **Policy NRC-2.1** San Mateo Countywide Water Pollution Prevention Program. The City shall continue to participate in the San Mateo Countywide Water Pollution Prevention Program.
- Policy NRC-2.3 Best Management Practices to Reduce Water Pollution. The City shall require implementation of Best Management Practices consistent with the Municipal Regional Stormwater NPDES Permit to reduce non-point source pollutants in the drainage system.

During excavation or trenching activities during construction facilitated by the 2040 General Plan, it is possible that shallow, unconfined water could be encountered in the subsurface. Should this occur, dewatering of the excavation or trenching site may be required to protect the integrity of the work area and the water quality of the surrounding and downstream waterways. Dewatering is a process by which water is removed from the work area, held in storage tanks or trucks, and tested for contamination prior to discharge. If contamination is detected, the water is treated to the extent required for compliance with the Groundwater General Permit (Regional Board Order No. R2-2012-0060). Once the required water quality conditions are achieved, the water is discharged to an appropriate disposal facility or wastewater treatment plant, consistent with requirements of the Groundwater General Permit. The process of dewatering protects the water quality in underlying groundwater basins, as well as in riparian habitat (wetland) areas that may be hydrologically connected to the underlying groundwater basin.

The proposed project area is underlain by the Westside Groundwater Basin; as reported by DWR, the depth of groundwater wells that produce water supply from the Westside Groundwater Basin ranges between approximately 130 and 825 feet below ground surface (bgs), with an average depth of 625 feet bgs.²³ Trenching and excavation activities associated with the types of construction projects that would be facilitated by the proposed project would not include disturbance to these depths, and would not directly encounter confined groundwater resources, such that the potential to adversely impact the quality of the basin or connected habitat areas could occur. Additionally, through compliance with the policies above and the dewatering requirements associated with the Groundwater General Permit, any shallow, unconfined water that may be encountered during construction activities would be managed toward the express purpose of avoiding water quality degradation. Therefore, should dewatering activities be necessary during construction, it is not anticipated that water quality degradation to the underlying groundwater basin or to riparian habitats or wetland areas would occur.

In addition, as stated for Policy NRC-2.3, the City will comply with the Municipal Regional Stormwater NPDES Permit to reduce non-point source discharges; the City is a party to this permit as part of the San Mateo Countywide Water Pollution Prevention Program (San Mateo Permittees) as stated in Policy NRC-2.1. Specific to dewatering activities, the Municipal Regional Stormwater permit requires that water samples will be tested for turbidity and pH on the first two consecutive days of dewatering (Section C.15.b, Subpart [ii]), and provides specific limits for turbidity and pH of discharge water (Subparts [vi] and [vii], respectively) to avoid water quality degradation from activities including dewatering during construction. As such, compliance with existing regulations and 2040 General Plan policies would ensure that impacts related to water quality degradation through the discharge of dewatered groundwater would be less than significant. Therefore, 2040

²³ DWR. 2006. California's Groundwater Bulletin 118. San Francisco Bay Hydrologic Region – Westside Groundwater Basin. Available: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/2_035_Westside.pdf. Accessed July 2022.

General Plan construction impacts related to surface water quality and groundwater quality would be less than significant.

SPECIFIC PLAN

Development facilitated by the Specific Plan would involve similar potential for water quality degradation or associated impacts to occur as a result of ground-disturbing activities and the use of potentially hazardous materials during construction. Activities within the Specific Plan area are subject to the same NPDES program requirements as above and would be required to develop SWPPPs with project specific BMPs to minimize or avoid the potential for water quality impacts.

Any shallow groundwater requiring dewatering during construction would be addressed in compliance with Regional Board Order No. R2-2012-0060. Compliance with existing regulations and 2040 General Plan policies would ensure that Specific Plan construction impacts related to surface water and groundwater quality would be less than significant.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Potential impacts related to the violation of water quality standards or waste discharge requirements, or the potential for activities to "otherwise substantially degrade water quality," would largely be limited to construction activities. Operation and maintenance activities would not involve the ground-disturbing activities and use of heavy construction equipment and machinery that introduce potential for an accidental spill or release of hazardous materials to occur, or erosion and sedimentation associated with disturbed soils.

Operation of development facilitated by the General Plan and Specific Plan would occur in compliance with goals and policies for the protection of surface water and groundwater quality. As listed above, those include Policy NRC-2.1, which requires City participation in the San Mateo Countywide Water Pollution Prevention Program, Policy NRC-2.2, which states the City shall continue to implement measures consistent with the Municipal Regional Stormwater NPDES Permit (which the City is party to as a member of the San Mateo Permittees), and Policy NRC-2.3, which further specifies compliance with non-point source pollution BMPs consistent with the Municipal Regional Stormwater NPDES Permit.

In addition, development facilitated by the 2040 General Plan would be implemented in accordance with the applicable goals and policies of the General Plan, including those policies presented below under Goal NRC-2, for the protection of surface water and groundwater quality:

Goal NRC-2 Improve water quality by protecting surface water resources and restoring creeks and rivers to their natural state

- Policy NRC-2.1 San Mateo Countywide Water Pollution Prevention Program. The City shall continue to participate in the San Mateo Countywide Water Pollution Prevention Program.
- **Policy NRC-2.3 Best Management Practices to Reduce Water Pollution.** The City shall require implementation of Best Management Practices consistent with the Municipal Regional Stormwater NPDES Permit to reduce non-point source pollutants in the drainage system.

Policy NRC-2.4 Green Infrastructure. The City shall ensure all new developments implement green infrastructure, per the City's Green Infrastructure Plan, adopted by City Council in September 2019. Development, including public improvement projects, shall include "green" stormwater collection and treatment and employ Low Impact Development (LID) features that minimize surface water runoff and pollutants. LID features may include bioretention systems, swales, green roofs, infiltration systems, and permeable pavers.

With implementation of these 2040 General Plan policies and regionally consistent BMPs for water quality and NPDES compliance, operation would be consistent with water quality standards and waste discharge requirements. Therefore, 2040 General Plan and Specific Plan operational impacts related to surface water quality and groundwater quality would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Effects to Groundwater Supply and Recharge

Significance Criterion b: Would the proposed plans substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact HYD-2 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD NOT PUMP WATER FROM THE LOCAL GROUNDWATER BASIN AND WOULD NOT INTRODUCE NEW AREAS OF IMPERMEABLE SURFACES SUCH THAT THE RATES OR PATTERNS OF SURFACE WATER INFILTRATION WOULD BE AFFECTED. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Potential impacts to groundwater supply and recharge are limited to the operational period and permanent changes to the extent of impermeable surfaces that affect groundwater infiltration.

Operation

2040 GENERAL PLAN

Water supply for operation of development facilitated by the 2040 General Plan would continue to be purchased from the SFPUC via the existing RWA; no groundwater would be purchased or used to support proposed plans operation. In addition, the General Plan area is primarily built-up, and development would be limited to infill within previously disturbed areas; as such, development of the General Plan area would not introduce substantial new impervious areas such that infiltration rates or patterns could be adversely affected. Future development would also be consistent with Policy NRC-2.4, *Green Infrastructure*, which requires that development shall include LID features such as bioretention systems, swales, green roofs, infiltration systems, and permeable pavers. These features would minimize surface water runoff and the discharge of pollutants. Therefore, 2040 General Plan operational impacts related to groundwater resources would be less than significant.

SPECIFIC PLAN

Water for operation of development facilitated by the Specific Plan would continue to be purchased from the SFPUC and conveyed to the Specific Plan area via the RWA; no groundwater would be purchased or used to support proposed plans operation. In addition, development facilitated by the Specific Plan would decrease the extent of impermeable surfaces within the Specific Plan through implementation of expanded green space areas (see Table 3.8-3), as well as through the implementation of LID features including bioretention systems, swales, green roofs, infiltration systems, and permeable pavers, consistent with Policy NRS-2.4. In total, as quantified below, the Specific Plan would reduce impervious area by approximately 2.2 acres, specifically within the Northern Lomita Canal Drainage Area, Southern Lomita Canal Drainage Area, and Central Millbrae Drainage Area (see Table 3.8-3).

Drainage Area	Total Drainage Area Size (sf)	Specific Plan area – Existing Impervious (sf)	Specific Plan area – Proposed Impervious (sf)	Change in Impervious area (sf)	Change in Impervious area (acres)
Northern Lomita Canal Drainage Area	9,801,000	342,595	317,570	-25,025	-0.6
Southern Lomita Canal Drainage Area	7,143,840	1,717,127	1,670,792	-46,335	-1.1
Central Millbrae Drainage Area	41,033,520	1,892,129	1,869,146	-22,983	-0.5
MSASP Drainage Area	5,473,027	533,488	533,488	0	0
Murchison Drive Drainage Area	18,730,800	309,452	309,452	0	0
Mills Estates Drainage Area	5,662,800	n/a	n/a	0	0
Total Change				-94,343	-2.2

Table 3.8-3 Specific Plan Area Impervious Surface Change Summary

Source: Millbrae, City of. 2022. Millbrae Downtown and El Camino Real Specific Plan. June. Appendix B: Infrastructure Report. Available: https://www.ci.millbrae.ca.us/home/showpublisheddocument/26300/637909858885600000. Accessed July 2022.

Because development facilitated by the Specific Plan would reduce impervious surfaces within the area, it would have potentially beneficial effects on the underlying groundwater resources by facilitating infiltration of surface water to the subsurface. Beneficial effects would also be associated with flooding and drainage patterns, as reducing impermeable surfaces in turn reduces the rate and extent of surface water runoff and potentially flooding. Therefore, Specific Plan operational impacts related to groundwater resources would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation



Figure 3.8-2 Specific Plan Area Change in Impervious Areas

Source: Millbrae, City of. 2022. Millbrae Downtown and El Camino Real Specific Plan Appendix B: Infrastructure Report. Available: https://www.ci.millbrae.ca.us/home/showpublisheddocument/26300/637909858885600000. Accessed July 2022.

Effects of Drainage Alteration

Significance Criterion c:	Would the proposed plans substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
	1. result in substantial erosion or siltation on- or off-site;
	substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
	3. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
	4. impede or redirect flood flows?

Impact HYD-3 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD NOT ALTER THE COURSE OF A STREAM OR RIVER OR ADD SUBSTANTIAL NEW IMPERVIOUS AREAS SUCH THAT SURFACE RUNOFF OR FLOODING INCREASES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

Alternation of Flood Flows or Increased Runoff Resulting in Flooding

Impacts associated with drainage pattern alterations would be limited to the operational period and permanent changes of impermeable surfaces that affect drainage and flooding patterns. Therefore, no construction impacts would occur related to flooding or alteration of flood flows would occur.

New Source of Polluted Runoff or Erosion/Siltation

However, construction impacts could occur related to drainage in terms of erosion/siltation and additional sources of polluted runoff. However, construction activities would be implemented in accordance with the SWPPP requirements discussed above for Impact HYD-1, including but not limited to BMPs to minimize erosion or siltation such as could occur during soil-disturbing activities. With the implementation of erosion-control BMPs and accidental condition response requirements, construction would not result in substantial erosion on-or off-site, and impacts related to erosion/siltation and polluted runoff would be less than significant

Operation

2040 GENERAL PLAN

Alternation of Flood Flows

Development facilitated under the General Plan would be implemented in accordance with the NPDES program discussed above for Impact HYD-1. Future development would occur as infill within previously developed areas, such that activities would not impede or redirect the course of a stream

or river. Therefore, no 2040 General Plan operational impact would occur related to alteration of flood flows.

Increased Runoff Resulting in Flooding

The existing stormwater drainage system within the General Plan area is characterized by several "flood problem" areas, which are associated with the capacity of existing drainage characteristics and available facilities to those specific areas. Existing flood problem areas are discussed in Section 3.8.2, and detailed in Table 3.8-2, as well as portrayed on Figure 3.8-1; as discussed therein, the City of Millbrae developed a Storm Drain Master Plan²⁴ in 2018 to identify the improvements needed to eliminate or reduce flooding problems. Development facilitated by the 2040 General Plan would be implemented in accordance with the 2018 Storm Drain Master Plan and would therefore not exceed the capacity of existing or planned stormwater drainage systems. However, as discussed above under Impact HYD-2 and quantified in Table 3.8-2, development would not increase the extent of permanent impermeable surfaces within the General Plan area, and there would not be a conversion of open space (permeable surfaces) to impervious surfaces; to the contrary, development would reduce impermeable surfaces by approximately 2.2 acres. In addition, the 2040 General Plan contains goals and policies that would further reduce the potential for flooding impacts to occur:

- Policy HSHM-4.1 Flood Hazard Mitigation. The City shall cooperate and coordinate with San Mateo County, SFO, and other jurisdictions and agencies involved in the mitigation of flood hazards from sea level rise and major flood events.
- Policy HSHM-4.2 FEMA Flood Insurance Rate Maps. The City shall comply with Federal Emergency Management Agency (FEMA) to ensure that Federal Insurance Rate Maps correctly depict flood hazard areas.
- **Policy HSHM-4.3 Critical Facility Location.** The City shall strive to site critical public facilities, including hospitals and healthcare facilities, emergency shelters, police and fire stations, and emergency communications facilities outside of 100-year flood zones.
- Policy HSHM-4.4 Storm Drainage System. The City shall continue to work with the San Mateo County Flood Control District to improve and upgrade the storm drainage system. The City shall consider integrating green infrastructure into the storm drainage system in accordance with the City's adopted Green Infrastructure Plan, particularly in downtown and along the El Camino Real corridor, to reduce stormwater runoff and to reduce the potential for flooding.
- **Policy HSHM-4.5** New Development in Floodplains. The City shall implement Federal, State, and local requirements for new construction in floodplain areas to ensure that future flood risks to life and property are minimized.

With implementation of these 2040 General Plan policies, the rate or amount of surface water runoff would not be increased within the General Plan area and would not result in flooding within or outside the General Plan area. Policies HSHM-4.1 through HSHM-4.5 would ensure compliance with flood hazard BMPs to minimize or avoid flooding hazards. And Policies HSHM-4.1 and HSHM-4.5 would ensure that new development facilitated under the 2040 General Plan would be sited to

²⁴ Millbrae, City of. 2018. City of Millbrae Storm Drain Master Plan. https://www.ci.millbrae.ca.us/departments-services/publicworks/administration-engineering/storm-drain-master-plan. (accessed March 2022).

ensure that future flood risks, including those related to potential sea level rise inundation, are minimized. Therefore, 2040 General Plan operational impacts related to flooding would be less than significant.

New Source of Polluted Runoff

The potential for water quality degradation to occur as a result of polluted runoff is addressed under Impact HYD-1; the 2040 General Plan would not create or contribute substantial new sources of polluted runoff. Therefore, 2040 General Plan operational impacts related to additional sources of polluted runoff or exceedance of storm drainage system capacity would be less than significant.

Erosion/Siltation

Finally, no substantial changes to drainage patterns would occur, and implementation of Policies HSHM-4.1 through HSHM-4.5 would provide compliance with flood hazard BMPs to minimize erosion and siltation during precipitation events and maintenance activities. Operations under the 2040 General Plan would not increase impervious surfaces that would result in substantial erosion or siltation. Impacts would be less than significant.

SPECIFIC PLAN

Alternation of Flood Flows or Increased Runoff Resulting in Flooding

Land use changes within the General Plan area would generally be concentrated within the Specific Plan area. Although permanent land use changes would occur, they would not impede or redirect the course of as stream or river or substantially increase impervious surfaces; rather, as discussed above for Impact HYD-1 and quantified under Impact HYD-2 (see Table 3.8-2), development facilitated by the Specific Plan would reduce the extent of impervious surfaces within the Specific Plan area by approximately 2.2 acres. This reduction of impervious area would improve drainage conditions by reducing runoff due to the increased infiltration that occurs in pervious areas such as greenspace, and in turn reducing the risk for flooding. Furthermore, Policies HSHM-4.1 and HSHM-4.5 would ensure that new development facilitated under the 2040 General Plan would be sited to ensure that future flood risks, including those related to potential sea level rise inundation, are minimized.

In addition, Sea Level Rise Standards included in the LID treatment for new developments that would be facilitiated by the Specific Plan would require local mitigation strategies to protect parcels below 13.3 feet NAVD88²⁵ that are subject to flooding, and could also give flexibility to developers to pay into regional mitigation strategies such as flood walls and sea walls to provide flooding protection against sea level rise.²⁶ Development facilitated by the proposed plans would not exacerbate existing potential for sea level rise to occur. Therefore, Specific Plan operational impacts related to flooding or alteration of flood flows would be less than significant.

New Source of Polluted Runoff or Erosion/Siltation

Development facilitated by the Specific Plan would be implemented in accordance with the drainage improvements recommended in the 2018 Storm Drain Master Plan and would therefore not exceed the capacity of existing or planned stormwater drainage systems. Because development facilitated

²⁵ NAVD88 = North American Vertical Datum of 1988

²⁶ Source: Millbrae, City of. 2022. Millbrae Downtown and El Camino Real Specific Plan. June. Available:

https://www.ci.millbrae.ca.us/home/showpublisheddocument/26300/637909858885600000. Accessed July 2022.

by the Specific Plan would reduce impervious surfaces within the area, it would have potentially beneficial effects on the underlying groundwater resources by facilitating infiltration of surface water to the subsurface. Beneficial effects would also be associated with flooding and drainage patterns, as reducing impermeable surfaces in turn reduces the rate and extent of surface water runoff and potentially erosion and siltation. Therefore, Specific Plan operational impacts related to erosion/siltation and polluted runoff would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Effects of Pollutant Release Due to Inundation

Significance Criterion d: In flood hazard, tsunami, or seiche zones, would the proposed plans risk release of pollutants due to project inundation?

Impact HYD-4 DEVELOPMENT FACILITATED BY THE **2040** GENERAL PLAN AND SPECIFIC PLAN WOULD NOT INCREASE EXISTING POTENTIAL FOR INUNDATION WITHIN FLOOD HAZARD AREAS TO OCCUR AND WOULD NOT INTRODUCE SUBSTANTIAL NEW POLLUTANT SOURCES THAT COULD POTENTIALLY BE RELEASED DUE TO INUNDATION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Impacts associated with flooding and inundation are limited to operational periods. No construction impacts related to flooding would occur.

OPERATION

2040 GENERAL PLAN

A small portion of the General Plan area along the San Francisco Bay is within a tsunami inundation area. The General Plan area is not vulnerable to inundation from seiche, including should such an event occur on San Andreas Lake; as stated in Section 3.8.2, *Environmental Setting*, the elevation and intervening topography between San Andreas Lake and the General Plan and Specific Plan areas inhibits inundation in response to seiche. There are areas of both 100-year and 500-year floodplains within the General Plan area; however, development facilitated by the 2040 General Plan would occur as infill development and would not introduce new development in previously undisturbed areas or alter existing potential for inundation to occur. The 2040 General Plan would not result in permanent land use conversions that would introduce new hazardous materials or potential for pollutant releases to occur from inundation. Furthermore, Policies HSHM-4.1 and HSHM-4.5 would ensure that new development facilitated under the 2040 General Plan would be sited to ensure that future flood risks, including those related to potential sea level rise inundation, are minimized. 2040 General Plan operational impacts related to inundation and corresponding release of pollutants risk would be less than significant.

SPECIFIC PLAN

Storm drainage in the Specific Plan area is not expected to increase, since the area is already developed and no increases in impervious surfaces are proposed. Specifically, there would be approximately 2.2 acres less of impervious areas under the Specific Plan compared to existing conditions. The presence of pervious surfaces facilitates the infiltration of surface water, which thereby reduces stormwater runoff and associated potential flooding and inundation. Furthermore, State-mandated stormwater management requirements require that new development minimize impervious surfaces and incorporate LID (Low Impact Development) features to treat stormwater on-site and prevent increased flows to the stormwater system and ultimately to the San Francisco Bay.²⁷ Therefore, although development facilitated under the Specific Plan would include permanent land use conversion, such changes would not alter existing potential for inundation to occur, and the Specific Plan would not result in permanent land use conversions that would introduce new hazardous materials or potential for pollutant releases to occur from inundation. Furthermore, Policies HSHM-4.1 and HSHM-4.5 would ensure that new development facilitated under the 2040 General Plan would be sited to ensure that future flood risks, including those related to potential sea level rise inundation, are minimized. Impacts would be less than significant. Specific Plan impacts related to inundation and corresponding release of pollutants risk would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Water Quality Control and Sustainable Groundwater Management Plan Consistency

Significance Criterion e: Would the proposed plans conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HYD-5 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

The potential to result in impacts to groundwater management would be limited to operation, when groundwater supply and recharge could be affected by permanent land use changes. In addition, construction activities would be required to adhere to water quality control regulations, including BMPs, to be included in project-specific SWPPs for any construction project disturbing more than one acre, as discussed under Impact HYD-1. Therefore, construction of the 2040 General Plan would not conflict with or obstruct implementation of a surface water quality or groundwater quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

²⁷ Millbrae, City of. 2022. Millbrae Downtown and El Camino Real Specific Plan. Public Review Draft. June. Available: https://www.ci.millbrae.ca.us/home/showpublisheddocument/26300/637909858885600000. Accessed July 2022.

Operation

2040 GENERAL PLAN

Development facilitated by the 2040 General Plan would be required to adhere to NPDES drainage control requirements as well as municipal requirements to manage surface water quality during operations, as discussed under Impact HYD-1. In addition, the Westside Groundwater Basin is identified by the DWR as Very Low Priority, and is, therefore, not required to be managed by a GSP under SGMA. However, the Westside Groundwater Basin is being actively managed and is not affected by overdraft conditions. Water supply for development facilitated by the 2040 General Plan would be purchased from the SFPUC and would not affect groundwater resources. Therefore, operation of the 2040 General Plan would not conflict with or obstruct implementation of a surface water or groundwater quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

SPECIFIC PLAN

Development facilitated by the 2040 General Plan would be required to adhere to NPDES drainage control requirements as well as municipal requirements to manage surface water quality during operations, as discussed under Impact HYD-1. Furthermore, permanent land use conversions within Millbrae would generally be concentrated within the Specific Plan area and would result in an overall decrease in the extent of impermeable surfaces by approximately 2.2 acres. This would generally be beneficial to water quality and groundwater management, as reduced impervious surface reduces the rates of surface water runoff and facilitates increased stormwater infiltration, which in turn limits the potential for polluted runoff to affect downstream waters. In addition, the presence of approximately 2.2 fewer acres of impervious surfaces during operation of future development would improve groundwater recharge potential, which would be supportive of sustainable groundwater management and not obstruct implementation of a sustainable groundwater management plan. Therefore, operation of the Specific Plan would not conflict with or obstruct implementation of a surface water or groundwater quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

3.8.5 Cumulative Impacts

The geographic scope of the cumulative hydrology and water quality analysis is the surface drainage management areas and stormwater infrastructure system shown in Figure 3.8-1 and the Westside Groundwater Basin. Potential impacts associated with surface water and drainage would generally be site-specific and confined within the stormwater drainage and management areas of Millbrae. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Impact Analysis*) located in Millbrae, Burlingame, South San Francisco, and at the San Francisco International Airport in addition to the proposed plans.

Water Flows and Drainage

The cumulative plans and projects listed in Table 3-1 generally consist of other general plan buildouts that direct the type and intensity of land use and development within specific areas, none of which overlap with the General Plan or Specific Plan areas or their vicinity within Millbrae. Additionally, as with the proposed plans, cumulative plans and projects would generally occur as infill and would not convert previously undisturbed areas or substantially change drainage patterns of the area. Therefore, cumulative impacts associated with surface flows and drainage would be less than significant

Flooding

The cumulative projects would generally have positive effects related to flooding, because the proposed infill development and redevelopment would increase the extent of permeable surfaces, which would allow for the infiltration of surface flows and reduce the velocity of surface runoff. Due to the site-specific nature of flooding impacts and the infill characteristics of the proposed plans as well as cumulative plans and projects, cumulative impacts related to potential for flooding would be less than significant.

Water Quality

Development facilitated by cumulative plans and projects would comply with policies related to water quality and would implement project-specific SWPPPs (as required by the Clean Water Act) with BMPs to minimize or avoid water quality degradation from construction and other ground-disturbing activities. Cumulative plans and projects would also be subject to requirements of the Clean Water Act and the policies of the applicable planning document. In addition, the proposed plans would have largely beneficial impacts to water quality, particularly groundwater quality, by increasing the extent of permeable surfaces in the area, which helps to filter contaminants out of surface runoff as it infiltrates soil to underlying groundwater resources. The potential for cumulative impacts related to water quality is considered unlikely. Therefore, cumulative impacts related to water quality would be less than significant due to the use of BMPs.

Overall Level of Cumulative Significance

Less than significant

3.9 Land Use Planning, Population, and Housing

3.9.1 Introduction

This section summarizes the City's land use characteristics, including the overall land use pattern as well as a more detailed analysis by major land use type, and analyzes existing plans and focus areas with development potential in order to determine the potential environmental effects of the proposed plans related to Land Use and Planning. Additionally, this section addresses the potential population growth and housing displacement impacts associated with development facilitated by the proposed plans. Data used to prepare this section were obtained from the United States Bureau of the Census (US Census) and the California Department of Finance (CDF).

3.9.2 Environmental Setting

Current Physical Land Use

General Plan Area

The General Plan area covers the 3.28 square miles (2,098.51 acres, including streets, highways, and other transportation corridors) of land within the City of Millbrae limits. Millbrae's current land use pattern is the result of more than 100 years of change, starting from a large ranch to the present-day built-out city. Residential and commercial development is currently driven by local and regional demand. The City is characterized as a suburban residential community, as more than 50 percent of Millbrae's land is occupied with residential uses. Residential neighborhoods in Millbrae primarily contain single-family residences on 5,000 square-foot lots, with larger lots located in the hillside areas in the southwestern portion of the City. There is more multi-family housing development within the eastern portion of the City.

Commercial uses account for less than 5 percent of the City's land use, with another 14 percent related to utility/public/quasi-public uses. About 24 percent of the land is occupied by streets and highways, and less than one percent is vacant. Commercial development is concentrated along El Camino Real, Broadway, Millbrae Avenue, and near the Millbrae Station. A light industrial area, transitioning to life science and office uses, is located south of Adrian Road. The general distribution of land uses within the City is shown in Table 3.9-1.

Existing Land Use	Acres	Percentage of Total Area
Single Family	943.5	59
Duplex/Triplex/Fourplex	32.3	2
Apartment	65	4.1
Mixed Use	5.6	0.4
General Commercial	75.8	4.7
Office	5	0.3
Industrial	12.7	0.8
Parks and Open Space	124.2	7.8
Public/Quasi-Public/Utility	223.5	14

Table 3.9-1 Distribution of Existing Land Uses in General Plan Area

Existing Land Use	Acres	Percentage of Total Area
Vacant	3.6	0.2
Other ¹	107	6.7
Total	1,598.2	100

Source: San Mateo County Assessor's Office 2016; Mintier Harnish, 2016.

Note: This table does not include streets, highways, or other transportation corridors. Therefore, total acreage accounts for only these land uses and does not reflect the total acreage within City limits.

¹Green Hills County Club, which is privately owned

As shown in Table 3.9-1, residential land use designations make up the largest share of existing land use within Millbrae. Approximately 1,046 acres, or 65 percent of the City's land uses are used for residential uses, including mixed use. Additionally, the Millbrae Station Area Specific Plan (MSASP) and proposed Specific Plan allow for residential use, including multi-family and mixed-use.

Very-low density, low-density, medium-density, medium-high-density, and high-density residential land use types are differentiated by allowable dwelling units per acre and Floor to Area ratios (FAR), as detailed in Table 2-4 in Chapter 2, *Project Description*. All land uses conditionally permit schools, childcare centers, and places of worship. Very-low- and low-density residential land uses allow for detached single-family residences with permitted accessory dwelling units (ADU) or junior ADUs. Very-low-density residential land use also conditionally permits country clubs. Medium-density residential allows for single-family, duplex, or triplex residences, as well as apartment buildings consistent with neighborhood character. Medium-high-density and high-density residential allows for multifamily residences, including rooming and boarding houses, clubs and lodges, community centers, sanitariums, and rest homes. High-density residential land use also permits hotels. Residential land uses are primary located west of Magnolia Avenue, with minimal low-density and medium-density residential uses adjacent to or east of the Bay Area Rapid Transit (BART) and Caltrain railway tracks.

The MSASP in the southeast portion of the City provides for a variety of uses including residential retail, hotels, employment center, light industrial, public facilities, and mixed use. The MSASP applies to the area surrounding the Millbrae BART and Caltrain station.

General Commercial land use provides for a full range of retail commercial uses, including apparel and accessory stores, food stores, banks, personal and professional services, hospitals, offices, large format retail stores, and eating and drinking establishments, as well as multi-family residences, hotels, and outdoor sales. Most of General Commercial land use are east of Highway 101 and east of Old Bayshore Highway, and a few lots are located on the edges of the Specific Plan area and adjacent to Interstate 280.

Industrial and Utilities land use provides for industrial, manufacturing, warehousing, and automotive uses. Other uses may include facilities owned and/or operated by public utilities to serve the public with electricity, gas, water, and communications, as well as service-commercial uses. Two areas in the City allow for Industrial and Utilities land use: one west of Highway 101 and north of Millbrae Avenue, and a second adjacent to the BART and Caltrain railway, south of Santa Paula Avenue.

Public Facilities land use provides for government offices/operations, schools, and community centers, and other public serving uses. Public facilities are scattered throughout the City, always adjacent to residential uses or open space.

Parks and Open Space land use provides for public and private recreational uses, open spaces, and areas that can be programmed for recreational uses. Parks and Open Space are designated throughout residential land uses and along the west side of Highway 101.

Areas Surrounding General Plan Area

TO THE NORTH

The City of San Bruno borders Millbrae to the north, and directly adjacent uses include open space recreation (Junipero Serra Park), residential neighborhoods, and educational facilities.

TO THE EAST

The San Francisco International Airport (SFO) borders Millbrae to the northeast and is located on the east side of Highway 101. In addition, the City contains an approximately 0.25-mile stretch of San Francisco Bay bayfront, just south of SFO.

TO THE SOUTH

The City of Burlingame borders Millbrae to the south, and directly adjacent uses include residential neighborhoods, commercial and office developments, and industrial operations.

TO THE WEST

Interstate 280 forms the western boundary of the city, with recreational open space beyond that includes the San Andreas South Trailhead, North Trailhead of Sawyer Camp Trail, and the San Andreas Lake.

Specific Plan Area

The Specific Plan area encompasses 0.23 square mile (144.20 acres) of land on either side of El Camino Real. The Specific Plan area stretches from the City of Millbrae limits at Santa Lucia Avenue to the north to Murchison Drive to the south. The Specific Plan area also extends to parts of Broadway and Magnolia Avenue to the west as well as San Anselmo Avenue and the MSASP boundary to the east.

Downtown is characterized by small format retail along Broadway, with occasional residential uses. There are several apartments, duplexes, and triplexes on Broadway, between Victoria Avenue and Murchison Drive, that are within walking distance to grocery stores and other retail locations. The two blocks between Taylor Boulevard and Meadow Glen Avenue contain larger blocks with major retailers. The Specific Plan area is also home to many of the City's civic facilities. The MSASP area is on the eastern end of the Specific Plan area, between Millbrae Avenue and El Camino Real. The San Francisco Public Utilities Commission has a large water treatment facility located east of El Camino Real.

The general distribution of land uses within the Specific Plan area is shown in Table 3.9-2. Most of the existing land uses (50.2 percent) are designated for General Commercial, while residential land uses are allocated 22.3 percent of the total area.

Existing Land Use	Acres	Percentage of Total Area
Single Family	7.9	8.1
Duplex/Triplex/Fourplex	2.0	2.1
Apartment	11.8	12.1
Mixed-Use	4.7	4.9
General Commercial	48.9	50.2
Office	1.9	2.0
Public/Quasi-Public/Utility	20.1	20.6
Total	97.4 ^{1,2}	100.0

Table 3.9-2 Distribution of Existing Land Uses in Specific Plan Area

Source: City of Millbrae El Camino Real/Downtown Specific Plan

¹Total sum of percentages may not equate 100 percent due to rounding.

²While the Specific Plan area totals approximately 144 acres, 97.4 acres excludes streets, sidewalks, open space, etc.

Areas Surrounding Specific Plan Area

TO THE NORTH

The City of San Bruno borders the northern portion of the Specific Plan area and contains commercial and residential uses adjacent to the Specific Plan area.

TO THE EAST

Residential neighborhoods are located to the east of the Specific Plan area within the City of San Bruno and City of Millbrae. The BART rail line is located to the east of the Specific Plan area. Millbrae Station and the MSASP area is located adjacent to the southeast portion of the Specific Plan area (between Hillcrest Boulevard to the north and Millbrae Avenue to the south)

TO THE SOUTH

Millbrae Avenue forms the southern boundary of the Specific Plan area. Commercial uses, comprising food service, gasoline station, and office spaces, are located directly to the south of the Specific Plan area.

TO THE WEST

Existing land uses adjacent to the western boundary of the Specific Plan area include residential neighborhoods, commercial retailers and food services, and civic uses.

Current Land Use Designations and Zoning

General Plan Area

The current Millbrae General Plan Land Use Element establishes nine separate land use designations to provide a mixture of land uses for the City, and the current Millbrae Zoning Code establishes thirteen separate zoning categories to provide a mixture of permitted land use densities, heights, and types for the City. Figures 2-3 and 2-4 in Section 2, *Project Description*, show the City's existing Land Use Designations and Zoning Maps.

Specific Plan Area

The Specific Plan area comprises primarily General Commercial (50 percent) and Public/Quasi-Public/Utility (20 percent) land use designations. The remaining 30 percent of land uses include single family, duplex/triplex/fourplex, apartment, mixed-use, and office. The Specific Plan area is zoned for both residential and non-residential uses, including Multiple Family, Duplex, Single Family Large Lot, Public Facilities, Commercial, Grand Boulevard Planned Development, and Downtown Improvement Area.

Population, Housing, and Employment

General Plan Area

POPULATION

After its incorporation in 1948, the City of Millbrae's population grew steadily in the 1950s and 1960s. The City of Millbrae experienced approximately 77 percent growth from 1950 to 1960 and 31 percent growth from 1960 to 1970.¹ From the 1970s until 2000, population growth in Millbrae was virtually nonexistent and overall population declined 0.3 percent.¹ Population growth between 2000 and 2010 was modest at approximately 4 percent.¹ Population growth since 2011 has continued at a faster rate than previous decades. From 2011 to 2021 population in Millbrae increased from 21,532 to 22,509, which is approximately 4.5 percent growth.²

HOUSEHOLDS AND DWELLING UNITS

A household is defined by the CDF and the US Census as a group of people who occupy a dwelling unit. A household differs from a dwelling unit because the number of dwelling units includes both occupied and vacant dwelling units. Not all of a jurisdiction's population lives in households. Rather, a portion of a jurisdiction's population lives in group quarters, such as board and care facilities; others are homeless.

Small households, consisting of one to two persons per household, generally reside in units with zero to two bedrooms; family households of three to four persons per household normally reside in units with three to four bedrooms. Large households of five or more persons per household typically reside in units with four or more bedrooms. However, the number of units in relation to the household size may also reflect preference and economics. Many small households obtain larger units and some large households live in small units for economic reasons.

Most of Millbrae's households reside in single-family dwelling units. Over the last decade, from 2010 to 2021, Millbrae has added fewer dwelling units than its corresponding population growth. In 2010, there were 8,372 dwelling units in the City and in 2021, there were 8,637 dwelling units; a 3.2 percent increase over the decade.² As of 2021, the average household size in Millbrae is 2.74 persons per household.². Of the estimated 8,637 dwelling units in the City, 5,683 are single-family units (66 percent), 2,921 are multi-family (34 percent), and 33 are mobile homes (0.4 percent).^{2,3}

¹ Metropolitan Transportation Commission/Association of Bay Area Governments. 2022. Bay Area Census City of Millbrae. Available: http://www.bayareacensus.ca.gov/cities/Millbrae70.htm. (accessed March 2022).

² California Department of Finance. 2021. E-5 Population and Housing Estimates for Cities, Counties, and the State 2010-2021. Available: https://doi.ca.gov/Forecasting/Demographics/Estimates/. (accessed March 2022).

³ Total sum of percentages may not equate 100 percent due to rounding.

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

EMPLOYMENT

Employment indicates the number of people who reside in a jurisdiction that have a job within or outside of that jurisdiction. As of 2020, 9,505 residents of Millbrae were employed.⁴ The number of employed residents has grown from 8,105 in 2010, a 17 percent increase. This indicates that the number of employed residents has substantially outpaced population growth.

JOBS-HOUSEHOLD RATIO

The jobs-household ratio in a jurisdiction is an overall indicator of jobs availability within the area. A balance of jobs and households can give residents an opportunity to work locally and avoid employment commutes to other places in the region. ABAG estimates that Millbrae and adjacent jurisdictions have a ratio of 0.76 jobs per dwelling units.⁴ ABAG's regional map depicting projected household and job growth illustrates a job to household ratio of 1.3 in northern San Mateo County, which is slightly below the region-wide average of 1.5.⁵ Millbrae's relatively low jobs per household indicates that residents of Millbrae are likely commuting to employment outside of the City. In General, most households have more than one worker; therefore, a ratio of jobs to household should be well above 1:1 to have a balance of jobs to households.

Specific Plan Area

EXISTING POPULATION

Based on the CDF persons per household rate for Millbrae of 2.74 persons and the estimated 1,250 dwelling units in the Specific Plan area, approximately 3,425 people live within the Specific Plan area.

EXISTING HOUSEHOLDS AND DWELLING UNITS

22.3 percent of the Specific Plan area is currently used for residential use, while an additional 4.9 percent is in mixed-use. Approximately 1,250 dwelling units are in the Specific Plan area.

EXISTING EMPLOYMENT

Considering that approximately 42 percent of Millbrae residents are employed, it can be assumed that roughly 1,439 Specific Plan area residents (42 percent of Specific Plan area population) are employed in or outside of the city.

JOBS HOUSEHOLD RATIO

It is assumed that the jobs-household ratio of 0.76 is roughly similar in the Specific Plan area as the General Plan area.

3.9.3 Regulatory Framework

Federal Regulations

No federal plans, policies, regulations, or laws related to population and housing are applicable to the proposed plans.

⁴ Association of Bay Area Governments. 2019. Projections 2040 by Jurisdiction. Available:

https://data.bayareametro.gov/Demography/Projections-2040-by-Jurisdiction/grqz-amra. (accessed March 2022).

⁵ Association of Bay Area Governments. 2021. Plan Bay Area 2050 Growth Pattern. Updated January 21, 2021.

State Regulations

California Government Code

California Government Code Section 65300 regulates the substantive and topical requirements of general plans. State law requires each city and county to adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning." The California Supreme Court has called the general plan the "constitution for future development." The general plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, both public and private.

California Government Code Section 65301 requires a general plan to address the geographic territory of the local jurisdiction and any other territory outside its boundaries that bears relation to the planning of the jurisdiction. The jurisdiction may exercise their own judgment in determining what areas outside of its boundaries to include in the Planning Area. The State of California General Plan Guidelines state that the Planning Area for a city should include (at minimum) all land within the city limits and all land within the city's Sphere of Influence. Millbrae's Planning Area includes two areas in the Sphere of Influence, one adjacent to SFO, and another in the northwestern corner of the city.

In counties and general law cities,⁶ zoning provisions must be consistent with the general plan. Millbrae is a general law city and is, therefore, required to have zoning consistency with its General Plan.

Local and Regional Regulations

Plan Bay Area 2050 and ABAG Regional Housing Needs Allocation

The Association of Bay Area Governments and the Metropolitan Transportation Commission (ABAG/MTC) Plan Bay Area 2050, adopted in October 2021, integrated transportation and land-use plan for the nine-county San Francisco Bay Area, including San Mateo County. Plan Bay Area 2050 meets all state and federal requirements for a Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). Plan Bay Area 2050 describes where and how the region can accommodate the additional 1.4 million new households and 1.4 million new jobs projected in the Bay Area by 2050 and details the regional transportation investment strategy over this period. Plan Bay Area 2050 identifies 35 strategies focused on improving housing, the economy, transportation, and the environment across the Bay Area over a 30-year period. Four geographic areas are identified in Plan Bay area 2050 to guide where future growth in housing and jobs would be focused over the next 30 years: Priority Development Areas (PDA), Priority Production Areas, Transit-Rich Areas, and High-Resource Areas. ABAG and MTC developed land use and transportation scenarios in Plan Bay Area 2050 that distributes the total amount of anticipated growth across the region and evaluates how well each scenario measures against the Plan goals. Based upon performance, the preferred scenario provides a regional pattern of household and employment growth and a corresponding transportation investment strategy.

MTC and ABAG designated the boundary of the Millbrae PDA, which is part of the Specific Plan area. While Plan Bay Area does not regulate development, the Millbrae PDA is eligible for transportation funds through MTC and ABAG that support and encourage residential and commercial development within the PDA.

⁶ General law cities are municipalities limited to governmental structures and powers specifically granted by State law.

Bay Area Rapid Transit District Transit Oriented Development Policy

In 2016, BART District's Board of Directors adopted a Transit Oriented Development (TOD) Policy that aims to promote high-quality, more intensive development on and near BART stations.⁷. BART's TOD Policy has the goal of increasing transit ridership and quality of life at and around BART stations by encouraging and supporting high-quality TOD within walking distance of BART stations, and by reducing the access mode share of the automobile by enhancing multi-modal access to and from BART stations.

San Francisco International Airport Land Use Compatibility Plan

The Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (SFO), adopted in 2012, is the Airport Land Use Compatibility Plan (ALUCP) for SFO. Under State law, City/County Association of Governments of San Mateo County (C/CAG), acting in its capacity as the Airport Land Use Commission (ALUC) for San Mateo County, is given authority to (1) specify how land near airports is to be used, based on safety and noise compatibility considerations; (2) develop height restrictions for new development to protect airspace in the vicinity of the airport; and (3) to establish construction standards for new buildings near airports, including sound insulation requirements. C/CAG, acting as the ALUC, is required "to review the plans, regulations, and other actions of local agencies and airport operators..." for consistency with the SFO ALUCP. Additionally, while C/CAG, acting as the ALUC, is vested by State law with limited land use planning authority, they have no specific implementation authority. For example, the ALUC has no authority to issue permits prior to construction of a building or grant approvals for the recording of subdivision plats. Actions by the ALUC can be overruled by local governments (e.g. City of Millbrae), although the override action must follow specific steps and be supported by adopted findings.

The SFO ALUCP addresses the four primary areas of concern related to the proposed plans, including aircraft noise impact reduction, safety of persons on the ground and in aircraft in flight, height restrictions/airspace protection, and overflight notification.⁸ The SFO ALUCP land use/building regulations policies are in place to help guide development and implementation. The SFO ALUCP contains the following goals:

- To protect San Francisco International Airport (SFO) from further encroachment by incompatible land uses;
- To safeguard the general welfare of the inhabitants within the vicinity of the Airport and the public by protecting them from adverse effects of aircraft noise and by avoiding an increase in the number of people exposed to airport/aircraft related hazards;
- To ensure that no structures or land use characteristics adversely affect the navigable airspace in the vicinity of the Airport to provide for the safe passage of aircraft in flight; and
- To provide guidance to land use agencies on compatible land uses in the environs of SFO.

Additionally, the following policies contained in the SFO ALUCP are relevant to land use in Millbrae:

⁷ Bay Area Rapid Transit. 2016. Transit-Oriented Development Policy. Last amended April 23, 2020. Available: https://www.bart.gov/sites/default/files/docs/BART%20Transit-Oriented%20Development%20Policy_Amended2020-04-23.pdf. (accessed March 2022).

⁸ City/County Association of Governments of San Mateo County. 2012. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport. November 2012. Available: https://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf/>. (accessed March 2022).

- GP-5.1 Development Actions With Previous Airport Land Use Commission (C/CAG Board) Consistency Determinations. Proposed development actions determined to be consistent or conditionally consistent with the ALUCP in effect at the time of Airport Land Use Commission (C/CAG Board) project review do not require further review under this ALUCP, unless the proposed development is within Area B of the Airport Influence Area (AIA), the project referral area, and one or more of the following changes are proposed:
 - 1. An increase in the proposed residential density
 - 2. The addition of a land use that is incompatible under this ALUCP
 - 3. The height of a structure is to be increased and would create a hazard or obstruction as determined by the FAA
 - 4. The addition of a characteristic that would create a hazard to air navigation

If any of these changes are proposed, the development action must be reviewed for consistency with this ALUCP.

- **GP-8.1** Notification and Review of Proposed Land Use Policies. Any proposed land use policy action that affects property within the project referral area, Area B of the AIA, must be referred to the Airport Land Use Commission (the C/CAG Board) for a determination of consistency with the relevant policies of this ALUCP. Local jurisdictions shall notify the Airport Land Use Commission of every such proposed land use policy action as required by State law. The Airport Land Use Commission shall notify the SFO Airport Director, or the Airport Director's designee, as soon as possible after it receives a request for a consistency review of a proposed land use policy action. The intent is to afford the appropriate Airport staff an opportunity to review and comment on the proposed land use policy action.
- **GP-8.2** Notification to Airport of Proposed Land Use Policy Actions. C/CAG shall encourage local governments to inform the Airport of proposed land use planning projects within Area B of the AIA in a manner and at a time that enables Airport staff to review and provide timely comments on the proposed land use policy actions.
- **GP-8.4** Advisory Review of Development Proposals. Under state law, local governments may submit development proposals to the Airport Land Use Commission for non-binding advisory review. C/CAG shall encourage local governments to submit the following types of development proposals within Area B of the AIA to the Airport Land Use Commission for advisory review:
 - Commercial or mixed use development of more than 100,000 square feet of gross building area;
 - Residential or mixed use development that includes more than 50 dwelling units;
 - Public or private schools;
 - Hospitals or other inpatient medical care facilities;
 - Libraries;
 - Places of public assembly.

- **GP-13.1 General Plan, Specific Plan, and Zoning Ordinance/Rezoning Review**. General plan, specific plan, and zoning ordinance/rezoning reviews are based on the ability of the proposed land use policy action to prevent future development of land uses or land use characteristics that would conflict with the airport/land use compatibility policies, standards, and criteria of this ALUCP. These consistency evaluations must consider the following factors, based on their relationship to the relevant policies and criteria of the ALUCP:
 - Residential densities;
 - Types of non-residential land uses;
 - Open space uses;
 - Height limits/architectural features/materials;
 - Sound insulation requirements;
 - Exposure to aircraft noise/overflight;
 - Potential impact on airspace protection.
- LP-1 Relationship of Compatibility Criteria to Proposed Development and Land Use Policy Actions. The airport/land use compatibility of a proposed development or land use policy action shall be determined by comparing the proposed development or land use policy action with the safety compatibility criteria, the noise compatibility criteria, and the airspace protection/height limitation criteria of this ALUCP. The three sets of criteria are to be used in combination, with the most restrictive requirement controlling on any given property.

A proposed local agency land use policy or development action must be compatible with each of these elements for the Airport Land Use Commission (the C/CAG Board) to determine that the proposed action is consistent with the ALUCP. If a proposed action is incompatible with any of these criteria, the Airport Land Use Commission (the C/CAG Board) shall determine that the proposed action is inconsistent with the ALUCP.

IP-2 Airport Influence Area B – Policy/Project Referral Area. Within Area B, the Airport Land Use Commission (the C/CAG Board) shall exercise its statutory duties to review proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezonings, and land development proposals. The real estate disclosure requirements in Area A also apply in Area B. For the purposes of this policy, parcels along the edge of the Area B Boundary that are split by the boundary shall be considered as fully being within Area B.

Millbrae General Plan

The current Millbrae General Plan contains policies related to land use/planning and population/housing, but they would be replaced by the proposed 2040 General Plan.

Millbrae Station Area Specific Plan

The MSASP was adopted in 2016 and refined the vision for Millbrae Station that was set out in the 1998 General Plan. The 2016 MSASP plans for multimodal and circulation improvements, as well as infrastructure improvements required to accommodate new development. Land use under the MSASP is envisioned to be primarily Transit-Oriented Development (TOD), which aims to create a

compact, walkable, and high-density mixed-use residential and commercial area within one-half mile of a transit station that encourages transit use. Land uses include residential mixed-use, retail center, employment center/light industrial, hotels, public facilities, and multi-family residential overlay.

Millbrae Municipal Code and Zoning Ordinance

Zoning is the primary tool used to implement a community's general plan. A major difference between a general plan and zoning ordinance is that the general plan provides general guidance on the location, type, and density of new growth and development over the long term, while the zoning ordinance provides detailed development and use standards for each parcel of land. The zoning ordinance divides the community into zoning districts and specifies the uses that are permitted, conditionally permitted, and in some instances, which uses are specifically prohibited within each district.

Typically, a zoning ordinance consists of text and a map delineating districts for such basic land uses as residential, commercial, and industrial, and establishing special regulations for historic preservation, floodplains, hillside development and other specific concerns. For each of the basic land uses, the zoning ordinance text typically includes an explanation of the purpose of the zoning district; a list of principals permitted and conditionally permitted uses; and standards for minimum lot size, density, height, lot coverage, setback, and parking. The zoning ordinance also typically describes procedures for processing discretionary approvals.

The Millbrae Zoning Ordinance (Millbrae Municipal Code Chapter 10.05) includes 12 zoning districts. Each zoning district has developed standards that are designed to protect and promote the health, safety, and general welfare of the community and to implement the policies of the General Plan. The zoning districts only apply to land within City limits and the standards aim to preserve the character and integrity of existing neighborhoods. Within a typical district there are regulations related to land use, lot size, coverage, building heights, parking, and landscaping.

The 12 zoning districts established by the Millbrae Zoning Ordinance are:

- R-1LL Single-family large lot
- R-1 Single-family residential
- R-2 Duplex/triplex residential
- R-3 Multifamily residential
- C Commercial
- DIA Downtown improvement area
- I Industrial
- OS Open space
- PF Public facilities
- PD Planned development
- MSAPD Millbrae Station Area Planned Development
- GBPD Grand Boulevard Planned Development

3.9.4 Impacts and Mitigation Measures

Significance Criteria

The City of Millbrae utilizes the following 2022 CEQA Guidelines Appendix G significance criteria questions related to Land Use Planning, Population, and Housing.

Would the 2040 General Plan or Specific Plan:

- a) Physically divide an established community?
- b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?
- c) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure?
- d) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Approach to Analysis

Land Use Planning

The evaluation of proposed plans impacts related to land use planning is based on a comparison of the 2040 General Plan and Specific Plan to the applicable plans, policies, and regulations to determine if development facilitated by the proposed plans would conflict with a plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. This section also analyzes whether development facilitated by the proposed plans, or its policies would physically divide communities.

Implementation of the proposed plans could result in a significant impact if they conflict with applicable land use plans and policies of the MSASP, Active Transportation Plan (ATP), Grand Boulevard Multimodal Transportation Corridor Plan, ABAG/MTC's Plan Bay Area 2050, Millbrae Municipal Code, Millbrae Climate Action Plan, Bay Area Air Quality Management District's 2017 Clean Air Plan, and the SFO ALUC.

A policy inconsistency is considered a significant adverse impact only if the inconsistency would result in a significant adverse physical impact based on the established significance criterion. Consistency of the proposed plans with applicable land use plans and policies is evaluated below.

The 2040 General Plan and Specific Plans' consistency and impacts on the implementation of the City's ATP and the Grand Boulevard Multimodal Transportation Corridor Plan are discussed in Section 3.12, *Transportation*. Consistency of the proposed plans with the Millbrae Climate Action Plan is discussed in Section 3.6, *Greenhouse Gas Emissions and Energy*. Consistency of the proposed plans with the 2017 Clean Air Plan is discussed in Section 3.2, *Air Quality*. Consistency with the existing Zoning Ordinance in the Millbrae Municipal Code is not evaluated, since adoption of the 2040 General Plan would require revisions to the Zoning Ordinance and Zoning Map to ensure consistency with the 2040 General Plan. Consistency with the Millbrae Municipal Code with respect to protected trees are evaluated in Section 3.3, *Biological, Agriculture, and Forestry Resources*, and with the City's adopted land use compatibility standards specifically with respect to noise are evaluated in Section 3.10, *Noise*.

Population and Housing

Population and housing trends in Millbrae were evaluated by reviewing the most current data available from the U.S. Census Bureau, the CDF, the current 1998 Millbrae General Plan, ABAG, and the 2023-2031 RHNA. Impacts related to population are generally social or economic in nature. Under CEQA, a social or economic change is generally not considered a significant effect on the environment unless the changes are directly linked to a physical change.

For purposes of this analysis, substantial population growth is defined as growth exceeding ABAG or Bay Area AQMD population forecasts for Millbrae. Substantial displacement would occur if allowed land uses would displace substantially more residences than would be accommodated through growth accommodated by the proposed plans.

EIR Scoping Comments Consideration

This section also addresses a comment from C/CAG and SFO received in response to publication of the Notice of Preparation for this EIR, regarding the SFO ALUCP. Consistency of the proposed plans with the ALUCP is discussed under Impact LU-2.

Specific Thresholds of Significance

For purposes of this analysis, the following thresholds are used to evaluate the significance of land use/planning and population/housing impacts resulting from implementation of the proposed plans.

- Development resulting in physically dividing a community area within Millbrae.
- Development conflicting with the MSASP or Municipal Code.
- Inducement of permanent or daytime population or employment growth in the Millbrae planning area that would exceed City of Millbrae or ABAG population projections for Millbrae.
- Displacement of existing housing or permanent population.

Impact Evaluation

Effects on an Established Community

Significance Criterion a: Would the plans physically divide an established community?

Impact LU-1 IMPLEMENTATION OF THE PROPOSED 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD MAINTAIN ORDERLY DEVELOPMENT IN MILLBRAE AND WOULD NOT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Impacts related to physical division of an established community are limited to operational impacts. To the extent that construction activities obstruct roads, it would be temporary and would not constitute a division of an established community. No respective construction impacts would occur related to potential division of a community.

Operation

Most of the land within the General Plan area and Specific Plan area is currently developed, with more than half of the City's land occupied with residential uses. As summarized in Table 3.9-1,

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commercial uses are mostly concentrated along El Camino Real, Broadway, Millbrae Avenue, and near the Millbrae Station and account for less than 10 percent of the City's existing land use. Vacant parcels comprise approximately four percent of all land within the General Plan area and Specific Plan area, which limits new housing and development opportunities. As such, most new housing and development under the proposed plans would need to occur through redevelopment of existing underutilized land and reuse of existing buildings and would increase the density and intensity of the existing land uses within the City. The proposed plans do not include substantial land use or circulation changes that would physically divide an established community, residential, or otherwise. For example, no major roads or other facilities would be constructed that would physically divide established communities within Millbrae.

2040 GENERAL PLAN

The potential growth associated with the 2040 General Plan is based on development assumptions/projections for residential and non-residential development for all land within the City limits through the year 2040. Vacant and underutilized parcels were identified using existing land use data from the Assessor's Office. Collectively, the existing uses, development capacity on the vacant and underutilized sites, planned and approved projects, and intensified development for residential, commercial, and civic uses sum up to be Millbrae's total buildout capacity in 2040. The 2040 General Plan seeks to ensure that infill development is done in a way that captures opportunities to increase the local base of high-paying jobs while achieving a commercial business mix of uses that better serves resident needs and attracts visitors.

The City of Millbrae is surrounded by existing development and natural features, such as SFO (located east of the City), San Andreas Lake and Interstate 280 (both located west of the City), and neighboring development within the jurisdiction of the City of San Bruno to the north and City of Burlingame to the south. As discussed above in the Setting, much of the City is developed with residential uses; with established recreational parks and green spaces. The 2040 General Plan includes policies and establishes land use designations that identify the type and intensity of uses permissible in the General Plan area. Infill development and the creative reuse and redevelopment of existing sites have emerged as the primary means for accommodating future growth in Millbrae. Intensity/density standards are established for each land use classification. The intent of the land use designations is to adequately classify and distinguish the various land uses needed within the Plan Area. The 2040 General Plan also aims to direct growth within the City's sphere of influence to ensure orderly buildout in density and intensity while maintaining existing neighborhood characteristics and encourage economic development that is compatible with existing uses to reinforce and create a cohesive community.

The existing transportation network in Millbrae also presents constraints to future development, despite the ample variety of regional (and international) transportation connections. The 2040 General Plan notes that one of the greatest challenges is El Camino Real, which bisects the City and separates downtown Millbrae and westside residential neighborhoods from the Millbrae Station, and poses significant obstacles for pedestrians and bicyclists as a six-lane highway with high traffic volumes and high vehicular speeds. The 2040 General Plan emphasizes the integration of land use and transportation as a major focus to reinforcing community cohesion and accessibility in the Land Use Element. Strategies include encouraging the efficient use of land by placing more intensive development near the Millbrae Station and along the El Camino Real corridor to maximize transit use; identifying opportunities for public-private partnerships to achieve quality infill development, enhance the public realm, and encourage multi-modal transportation systems; and promoting pedestrian-scaled, walkable neighborhoods. Policies in the 2040 General Plan Land Use Element, as

well as the Mobility Element, support the City in embracing these changes by planning for the future and maintaining flexible land use regulations that embrace new transportation technologies. Providing this link between land use and transportation planning reduces the necessity for new high volume arterial roads that could otherwise physically divide communities.

The 2040 General Plan Land Use Element contains goals and policies, listed below, that would maintain existing communities within Millbrae and ensure that established communities would not be divided by development facilitated by the 2040 General Plan.

2040 GENERAL PLAN LAND USE ELEMENT GOALS AND POLICIES

- Goal Land Use-1 Integrate new development with the fabric of the surrounding neighborhoods to create a cohesive community.
 - Policy LU-1.1 Prioritize New Development in Specific Plan Areas. The City shall prioritize higher density and intensity development around the Millbrae Station, along El Camino Real, and in Downtown. The City shall use specific plans for these areas to ensure new development is context sensitive, contributes to a positive city image, and preserves the positive qualities of surrounding neighborhoods.
 - **Policy LU-1.5 Revitalization and Redevelopment.** The City shall encourage property owners citywide to contribute to the community by revitalizing and redeveloping abandoned, obsolete, or underutilized properties.
- Goal Land Use-3 Preserve and enhance the identity and qualities of Millbrae's distinct residential neighborhoods to ensure Millbrae remains a desirable place to live.
 - **Policy LU-3.1** Neighborhood Character. The City shall strive to ensure that all new construction, additions, or remodeling projects are compatible with the architecture of the building, surrounding neighborhood and of the community as a whole.
 - **Policy LU-3.5 Community Engagement in Planning Decisions.** The City shall facilitate community engagement in planning decisions by enhancing outreach efforts and encouraging community meetings to review and comment on plans, programs, activities, and reports covering new development projects. In addition, the City shall ensure that all development applications are appropriately noticed in conformance with State and City public notice requirements.
- Goal Land Use-7 Transform the Station Area into a walkable, mixed-use district that supports connectivity between the Millbrae Station and Downtown.
 - **Policy LU-7.7 Cohesive Urban Fabric.** The City shall ensure that new development within the Station Area complements and enhances City image and provides adequate connections to El Camino Real and Downtown to support a cohesive urban fabric.

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- Goal Land Use-9 Ensure high-quality site planning, landscaping, and architectural design for all new construction, renovation, or remodeling.
 - **Policy LU-9.3 Community Preservation Ordinance.** The City shall continue to administer and enforce the Community Preservation Ordinance to maintain quality of life.
- Goal Land Use-11 Ensure that all land use decisions benefit Millbrae residents equally and do no not create a disproportionate burden to any resident based on location, income, race/ethnicity, educational status, or national origin.
 - **Policy LU-11.1 Environmental Justice Consideration.** The City shall consider potential adverse health and safety impacts associated with land use decisions and reduce negative impacts on residents from hazardous materials, industrial activities, facility locations, and design features.
 - **Policy LU-11.3 Equitable Public Services.** The City shall equitably provide public services and infrastructure, including parks, recreational facilities, community gardens, and public safety facilities, to all Millbrae residents.
 - **Policy LU-11.4** New Incompatible Uses. The City shall limit the introduction of new incompatible land uses and environmental hazards into existing residential areas.

The goals and policies of the 2040 General Plan would maintain existing communities in Millbrae and would ensure that established communities would not be divided by development facilitated by the 2040 General Plan. Specifically, Goal Land Use-1 would support infill development and redevelopment to ensure orderly growth within the City that would not divide communities. Additionally, Polices LU-1.1 and LU-1.5 encourage strategic infill and development that prioritizes increasing the density and intensity while revitalizing specific areas throughout the City. Policies LU-3.1 and LU-3.5 strive for maintenance of neighborhood character and standards through community engagement, which would maintain existing communities. Policy LU-9.3 encourages enforcement of the Community Preservation Ordinance. Policy LU-11.1 calls on the City to consider adverse impacts associated with land use decisions, which would include potential community division.

Adoption of the 2040 General Plan would require revisions to the Zoning Ordinance and Zoning Map to ensure consistency with the 2040 General Plan. Specifically, revisions to the Zoning Map would need to be consistent with the 2040 General Plan, incorporating revisions to the land use categories and other recommended design and development standards. Overall, the 2040 General Plan would promote orderly development in Millbrae by encouraging growth in designated focused areas and at infill sites near transit and other amenities while promoting the enhancement of the City's multimodal circulation system, maximizing connections, and minimizing barriers to connectivity. Therefore, the 2040 General Plan would not physically divide Millbrae, and development facilitated by the 2040 General Plan would have a less than significant impact.

Specific Plan

The Specific Plan establishes the vision for the El Camino Real corridor and downtown district, to transform the area into a vibrant and connected area that enhances quality of life while emphasizing transit-oriented mixed-use development. El Camino Real bisects the City and separates downtown Millbrae and westside residential neighborhoods from the Millbrae Station, and poses significant obstacles for pedestrians and bicyclists as a six-lane highway with high traffic volumes

and high vehicular speeds. Development facilitated by the Specific Plan would alleviate these obstacles while also improving the established street network and uses in a manner that maintains the surrounding neighborhood character and enhances existing civic and recreational uses. To these ends, the Specific Plan identifies opportunity sites for future development that would intensify uses while maintaining key frontage character along El Camino Real.

Meadow Glen Avenue via Helen Drive, Hillcrest Boulevard, and Millbrae Avenue are identified as key cross town connector corridors that tie the Specific Plan area to the rest of the City. These roadways would be improved, providing even better vehicle, bicycle, and pedestrian circulation for the established surrounding community. The Specific Plan contains comprehensive goals and policies that would work in parallel with the 2040 General Plan to realize the development vision for the Specific Plan area. Specific Plan policies specific to maintenance of existing communities and preventing the division of established communities are included herein.

SPECIFIC PLAN LAND USE GOALS AND POLICIES

- Goal Cultivate a pedestrian oriented, mixed-use environment in the downtown and along El Camino Real that supports vibrant commercial activity, maximizes transit use, enhances quality of life, and is well-scaled with surrounding neighborhoods
 - **Policy LU-1** Infill Development. The City shall support high quality infill development that provides a rich mix of businesses, housing types, and community-serving uses and encourage public transit, walking, and biking.
 - Policy LU-3 El Camino Real. The City shall prioritize higher density and intensity development along El Camino Real and establish a multimodal complete street, lined with a diverse mix of uses that are context sensitive and includes an attractive streetscape design that creates an inviting pedestrian environment and a positive city image.
 - Policy LU-4Downtown. The City shall encourage a mix of small- scale, infill development
with community gathering places that serves residents and attracts more
pedestrian traffic, while enhancing the charming character of downtown.
 - **Policy LU-10** Active Alley. The City shall improve the alley between Broadway and El Camino Real from Taylor Boulevard to Victoria Avenue to make it a visually attractive and vibrant space for people and businesses. Improvements may include an alley name, wayfinding signage, pavement improvements, landscaping, and public art. The City shall consider reviewing its development standards to allow for businesses and housing to front on the alley and consider implementing an Innovative Alley Toolkit for property owners, organizations, and businesses to use.

Specific Plan Policies LU-1, LU-2, LU-3, and LU-10 are directly aligned with the 2040 General Plan goals and policies that aim to ensure orderly land use intensification, densification, development, and redevelopment while maintaining the City's character.

Overall, the Specific Plan would promote orderly development in the Specific Plan area by encouraging growth in designated areas, establishing a neighborhood and community anchors, and providing guidelines for each land use designation. New residential units facilitated by the Specific

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Plan would be located within the Specific Plan area and would not physically divide an existing community. Additionally, the Specific Plan aims to transform El Camino Real into a more accessible street, instead of dividing the City. Therefore, the Specific Plan would not physically divide adjacent established communities. Development facilitated by the Specific Plan would have a less than significant impact.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Land Use Plans, Policies, and Regulations Consistency

Significance Criterion b: Would the plans cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact LU-2 IMPLEMENTATION OF THE 2040 GENERAL PLAN AND THE SPECIFIC PLAN WOULD BE GENERALLY CONSISTENT WITH APPLICABLE LAND USE PLANS, POLICIES, OR REGULATIONS ADOPTED TO AVOID OR MITIGATE ENVIRONMENTAL EFFECTS, SUCH AS ABAG/MTC'S PLAN BAY AREA 2050. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Impacts related to consistency with applicable land use plans and policies are limited to operational impacts. No respective construction impacts would occur from development facilitated by the proposed plans.

Operation

2040 GENERAL PLAN

Consistency with the Millbrae Station Area Specific Plan

The MSASP serves as a regulatory framework and development guide for land use, economic and environmental sustainability, and traffic and congestion reduction around the Millbrae Station. The MSASP contains eight goals that aim to create a vibrant transit hub that connects Millbrae to the Bay Area and contains comprehensive policies that address land use, urban design, housing, open space, circulation and parking, utilities and public services, and implementation. Table 3.9-3 includes MSASP land use policies and analysis that addresses whether the 2040 General Plan would be consistent with the policies.

MSASP Land Use Policy	2040 General Plan Consistency
P-LU 1. Encourage a rich mix of transit-supportive land uses in the Plan Area in close proximity to one another to encourage transit use, walking, and bicycling.	Consistent . The 2040 General Plan includes objectives to improve pedestrian and bicycle mobility, encourage transit-oriented, residential, and mixed-use developments, provide a safe and complete transportation network that encourages walkability and bike-ability and increases accessibility between neighborhoods, Downtown, and the Millbrae Station. These objectives are supported by several policies, including Policy LU-2.1, which encourages high- density residential uses near the Millbrae Station. Policy LU-3.7 promotes bike and pedestrian connectivity to local commercial districts and the Millbrae Station. Policy LU-4.4 similarly calls on the City to improve pedestrian safety and connectivity between the Millbrae Station and Downtown. Policy LU-7.4 encourages high-density, mixed-use development around the Millbrae Station to promote the creation of a compact, walkable, transit-oriented district. Several Mobility Element policies support transit use, walking, and bicycling, including Policies M-1.2, M-1.4, M-2.1, M-2.3, M-3.1, M-3.2, M-3.5, M-3.6, M-3.7, M-3.8, M-3.9, and M-3.11. Therefore, the 2040 General Plan would be consistent with MSASP Policy P-LU 1.
P-LU 2. Promote a mix of uses that support a day and evening environment in the immediate vicinity of the Millbrae Station. Uses that bring evening and weekend activity include retail shopping and services, food stores, restaurants and cafes, hotels, health clubs, and other similar uses.	Consistent. The 2040 General Plan includes objectives to promote a mix of uses around Millbrae Station, including promoting the revitalization of El Camino Real, encouraging mixed-use developments along El Camino Real, provide physical space to captivate a mix of businesses, foster investments in public spaces, and emphasize the best use of land. These objectives are supported by several policies, including Policies LU-1.1 and LU-1.5 that prioritizes higher density and intensity development and revitalization and redevelopment around the Millbrae Station. Policy LU-2.2 encourages maximization of mixed-use projects, including around the Millbrae Station. Policy LU-4.3 promotes a mix of commercial uses that support a day and evening environment. Therefore, the 2040 General Plan would be consistent with MSASP Policy-LU 2.
P-LU 3. Encourage residential mixed-use development with ground-floor retail spaces facing El Camino Real that support transit and downtown businesses.	Consistent . The 2040 General Plan includes objectives to encourage transit- oriented, residential, and mixed-use developments. These objectives are supported by several policies, including Policies LU-1.1 and LU-1.5 that prioritize higher density and intensity development, revitalization, and redevelopment around the Millbrae Station. Policy LU-1.2 encourages high-intensity development around the Millbrae Station that maximizes transit use. Policy LU- 2.1 that encourages high-density residential uses near the Millbrae Station. Policy LU-2.2 encourages maximization of mixed-use projects, including around the Millbrae Station. Policy LU-4.3 promotes a mix of commercial uses that support a day and evening environment. Policy LU-7.4 encourages high-density, mixed-use development around the Millbrae Station to promote the creation of a compact, walkable, transit-oriented district. Several Mobility Element policies support transit use, including Policies M-1.2, M-1.4, M-2.1, and M-2.3. Therefore, the 2040 General Plan would be consistent with MSASP Policy P-LU 3.
P-LU 4. Encourage the development of hotels in the Plan Area, especially near highway frontage.	Consistent . The 2040 General Plan includes several policies that encourage the development of hotels. Policy LU-4.3 promotes a mix of commercial uses, including hotels. Policy LU-4.6 supports the development of hotels. Policy LU-6.2 encourages renovation and upgrading of existing space for the development of new hotels. Policies ED-3.1 and ED-3.2 encourage the expansion of the hospitality sector in Millbrae. Policy ED-5.2 suggests boutique hotels as an example of a community anchor. Therefore, the 2040 General Plan would be consistent with MSASP Policy P-LU 4.

MSASP Land Use Policy	2040 General Plan Consistency
P-LU 5. Strive to concentrate active ground-level uses along major pedestrian routes and at key nodes to contribute to a safe and lively pedestrian environment.	Consistent . The 2040 General Plan includes objectives to improve pedestrian mobility and encourage mixed-use development along El Camino Real. These objectives are supported by several policies, including Policies LU-3.7 and LU-4.4, which promote pedestrian connectivity to local commercial districts and the Millbrae Station. Policy LU-5.2 encourages the creation of a community anchor to attract more pedestrian traffic. Policy M-1.10 calls on the City to add and maintain pedestrian-scale streetscape improvements. Policy M-3.10 encourages sidewalk improvements to accommodate outdoor dining, sidewalk furniture, and an overall better pedestrian atmosphere. Policy ED-5.2 encourages the development of a community anchor to boost pedestrian traffic. Therefore, the 2040 General Plan would be consistent with MSASP Policy P-LU 5.
P-LU 6. Provide public gathering places directly adjacent to the Millbrae Station that are pedestrian friendly and minimize conflict with automobiles.	Consistent . The 2040 General Plan includes an objective to create new public gathering spaces. This objective is supported by several policies, including Policy LU-4.5, which encourages development of community gathering places. Policy LU-5.2 calls for the creation of a community gathering place to serve as a community anchor. Therefore, the 2040 General Plan would be consistent with MSASP Policy L-LU 6.
P-LU 7. Preserve the historic Millbrae Depot for public-oriented uses.	Consistent . The 2040 General Plan includes several policies that encourage the preservation of historic districts. Policy RAC-2.3 calls on the City to provide incentives for historic structure preservation. Policy RAC-2.4 encourages flexible land use standards around adaptive reuse of historic buildings, which could include public-oriented uses. Therefore, the 2040 General Plan would be consistent with MSASP Policy P-LU 7.
P-LU 8. Ensure that proposed land uses are compatible with the noise environment, including rail, freeway, road traffic, and aircraft.	Consistent . The 2040 General Plan includes several policies that ensure land uses are compatible with the noise environment. Policies HSHM-6.4, HSHM-6.7, HSHM-6.8, and HSHM-6.9 encourage noise control and mitigation in relation to aircraft from SFO. Policies HSHM-10.1 through HSHM-10.13 are all related to achieving an acceptable noise environment by minimizing noise exposure. Therefore, the 2040 General Plan would be consistent with MSASP Policy P-LU 8.
P-LU 9. Encourage the development of uses that contribute to the quality of life of residents and employees, such as childcare facilities, community centers, plazas, playgrounds, and parks.	Consistent . The 2040 General Plan includes objectives to increase opportunities for physical activity and access to affordable childcare, and create physical public spaces to attract residents. These objectives are supported by several policies, including Policy LU-8.2, which ensures the adequate provision of community-serving facilities, including childcare. Goal Land Use-12 and associated policies aim to ensure that residents have access to healthy foods, education, green spaces, and medical services. Policy LU-3.7 promotes maintenance of public plazas, parks, and greenways. Policy LU-4.5 encourages development of community gathering places, such as plazas, parklets, and pocket parks. Policy ED-5.2 suggests plazas as an example of a community anchor. Therefore, the 2040 General Plan would be consistent with MSASP Policy P-LU 9.
P-LU 10. Promote Class A office development near the station and along Adrian Road to take advantage of its proximity to Highway 101, transit, and new residential development.	Consistent . The 2040 General Plan includes several policies that promote office development. Policies LU-4.3, LU-5.1, and LU-6.2 promotes a mix of commercial uses, including offices. Policy LU-7.5 specifically encourages offices around the Millbrae Station. Policy LU-7.6 encourages Class A office development around Millbrae Station to take advantage of the proximity to Highway 101 and transit. Therefore, the 2040 General Plan would be consistent with MSASP Policy P-LU 10.
P-LU 11. Encourage land assemblage to create parcels that are attractive to mixed use and office development.	Consistent . The 2040 General Plan includes objectives to increase mixed-use and office developments. These objectives are supported by several policies, including Policies LU-4.3, LU-5.1, and LU-6.2, which promote a mix of commercial uses, including offices. Policies LU-7.5 and LU-7.6 specifically encourage offices around the Millbrae Station. Policies LU-2.2, LU-4.3, and LU-7.4 encourages maximization of mixed-use projects, including around the

MSASP Land Use Policy	2040 General Plan Consistency
	Millbrae Station. Therefore, the 2040 General Plan would be consistent with MSASP Policy P-LU 11.
P-LU 12. Ensure new development includes appropriate buffers for land use compatibility between new uses and existing uses.	Consistent . The 2040 General Plan includes several policies that ensure buffers between new and existing uses. Policy NRC-1.11 encourages development standards that ensure adequate building setbacks to buffer against impact to sensitive habitat areas. Policies LU-6.1 and LU-9.2 call for transition in scale and form between developments. Therefore, the 2040 General Plan would be consistent with MSASP Policy P-LU 12.
P-LU 13. Ensure new uses contribute to a balanced mix of uses in the Plan Area consistent with the land use regulations set forth in Chapter 5.	Consistent . The 2040 General Plan includes objectives to balance a mix of land uses. These objectives are supported by several policies, including Policies LU-4.3, LU-5.1, and LU-6.2, which promote a mix of commercial uses. Policies LU-2.2, LU-4.3, and LU-7.4 encourages maximization of mixed-use projects, including around the Millbrae Station. Policies LU-1.1 and LU-1.5 prioritize higher density and intensity development and revitalization and redevelopment around the Millbrae Station Therefore, the 2040 General Plan would be consistent with MSASP Policy P-LU 13.
P-LU 14. Ensure the build out of the Plan Area advances the social, economic, environmental, and physical goals of the community and results in a series of community benefits that address the needs of existing and future Millbrae residents.	Consistent . The 2040 General Plan includes objectives to foster economic growth, protect the health and safety of residents, and emphasize the best of use of land for economic development. These objectives are supported by several policies, including Policy LU-8.2, which ensures the adequate provision of community-serving facilities. Goal Land Use-12 and associated policies aim to ensure that residents have access to healthy foods, education, green spaces, and medical services. Policy LU-3.7 promotes maintenance of public plazas, parks, and greenways. Policy LU-4.5 encourages development of community gathering places. Goals ED-1, ED-2, and ED-6 and associated policies aim to support a robust and stable economy, namely through support of local businesses. Therefore, the 2040 General Plan would be consistent with MSASP Policy P-LU 14.

As shown in Table 3.9-3, the 2040 General Plan would be consistent with the land use policies contained in the MSASP; and development facilitated by the 2040 General Plan would have a less than significant impact.

Consistency with the San Francisco International Airport ALUCP

As stated above in Section 3.9.3, *Regulatory Framework*, the SFO ALUCP includes land use/building regulations and policies to guide development and implementation. The ALUC C/CAG Board is responsible for reviewing proposed land use policy actions, which include new general plans, specific plans, zoning ordinances, plan amendments and rezonings, and land development proposals, for portions of unincorporated San Mateo County and municipalities located within Areas A and B of SFO's AIA⁸. Area A of SFO's AIA includes all of San Mateo County, all of which is overflown by aircraft flying to and from SFO at least once per week at altitudes of 10,000 feet or less above mean sea level. The City of Millbrae is adjacent to SFO, and the entirety of the city is within Area B of SFO's AIA. Area B's boundary is based upon a combination of the noise compatibility and safety zones.

2040 General Plan Policy HSHM-6.5 ensures that all applicable long-range plans and associated amendments and ordinances are reviewed by the C/CAG Board of Directors for a determination of consistency with the most current SFO ALUCP, as required by State law. Accordingly, the 2040 General Plan would be reviewed by C/CAG for consistency with the SFO ALUCP, including land use

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policies and proposed zoning changes under the 2040 General Plan that may exceed allowable building heights and residential densities under the SFO ALUCP. Therefore, development facilitated by the 2040 General Plan would have a less than significant impact.

Consistency with ABAG/MTC's Plan Bay Area 2050

Plan Bay Area 2050 is a long-range land use and transportation plan for the San Francisco Bay Area region. The plan contains 11 overarching strategies with associated specific strategies that seek to promote healthy, safe, and equitable communities by reducing impacts from air pollution, protecting open space and agriculture, and increasing active transportation. Section 3.6, *Greenhouse Gas Emissions and Energy*, addresses the 2040 General Plan's consistency with goals in the Millbrae CAP and Plan Bay Area 2050, including some strategies related to land use. Additional, strategies not included in Section 3.6, *Greenhouse Gas Emissions and Energy* and Section 3.12, *Transportation*, are addressed below in Table 3.9-4.

Plan Bay Area Strategies	2040 General Plan Consistency
Housing Strategies	
H2. Preserve existing affordable housing. Acquire homes currently affordable to low and middle-income residents for preservation as permanently deed- restricted affordable housing.	Consistent. The proposed 2040 General Plan Policy LU-2.1 promotes the provision of lower- and moderate-income housing. Therefore, the 2040 General Plan would be consistent with strategy H2.
H3. Allow a greater mix of housing densities and types in Growth Geographies. Allow a variety of housing types at a range of densities to be built in Priority Development Areas, select Transit- Rich Areas and select High-Resource Areas.	Consistent. 2040 General Plan Policy LU-1.1 specifically prioritizes new development in Specific Plan Areas, including high-density and intensity. Policy LU-2.1 calls for balanced neighborhoods that have a variety of housing types and density ranges. Policy LU-2.2 encourages mixed-use projects. Therefore, the 2040 General Plan would be consistent with strategy H3.
H4. Build adequate affordable housing to ensure homes for all. Construct enough deed restricted affordable homes to fill the existing gap in housing for the unhoused community and to meet the needs of low- income households.	Consistent. The proposed 2040 General Plan Policy LU-2.1 promotes the provision of lower- and moderate-income housing. Therefore, the 2040 General Plan would be consistent with strategy H4.
H6. Transform aging malls and office parks into neighborhoods. Permit and promote the reuse of shopping malls and office parks with limited commercial viability as neighborhoods with housing for residents at all income levels.	Consistent . The 2040 General Plan includes several policies that promote office development. Policies LU-4.3, LU-5.1, and LU-6.2 promotes a mix of commercial uses, including offices. Policy LU-7.5 specifically encourages offices around the Millbrae Station. Policy LU- 7.6 encourages Class A office development around Millbrae Station to take advantage of the proximity to Highway 101 and transit. Therefore, the 2040 General Plan would be consistent with strategy H6.
Economic Strategies	
EC4. Allow greater commercial densities in Growth Geographies. Allow greater densities for new commercial development in select Priority Development Areas and Transit-Rich Areas to encourage more jobs to locate near public transit.	Consistent. 2040 General Plan Policy LU-2.2 encourages mixed-use projects. Policies LU-2.3 and LU-6.2 promote a mix of commercial uses. Therefore, the 2040 General Plan would be consistent with strategy EC4.

Table 3.9-4 2040 General Plan Consistency with Plan Bay Area 2050 Goals

Plan Bay Area Strategies

2040 General Plan Consistency

EC6. Retain and invest in key industrial lands. Implement local land use policies to protect key industrial lands, identified as Priority Production Areas, while funding key infrastructure improvements in these areas **Consistent.** 2040 General Plan Policy LU-7.5 calls for designation of land for light industrial uses. Policy ED-1.7 encourages development of key light industrial sites. Therefore, the 2040 General Plan would be consistent with strategy EC6.

Source: Plan Bay Area 2050. MTC/ABAG 2021

As shown in Table 3.9-4, the 2040 General Plan would be consistent with the goals contained in the Plan Bay Area 2050. As concluded within this impact discussion, as well as discussion in Section 3.2, *Air Quality*, and Section 3.6, *Greenhouse Gas Emissions and Energy*, implementation of the 2040 General Plan would be consistent with applicable adopted plans, regulations, or policies. Impacts would be less than significant.

SPECIFIC PLAN

Consistency with the Millbrae Station Area Specific Plan

The MSASP serves as a regulatory framework and development guide for land use, economic and environmental sustainability, and traffic and congestion reduction around the Millbrae Station. The MSASP contains eight goals that aim to create a vibrant transit hub that connects Millbrae to the Bay Area; and contains comprehensive policies that address land use, urban design, housing, open space, circulation and parking, utilities and public services, and implementation. The Specific Plan area is directly adjacent. Table 3.9-3 includes MSASP land use policies and analysis that addresses whether the Specific Plan would be consistent with the policies.

MSASP Land Use Policy	Specific Plan Consistency	
P-LU 1. Encourage a rich mix of transit- supportive land uses in the Plan Area in close proximity to one another to encourage transit use, walking, and bicycling.	Consistent . The Specific Plan includes Goal Land Use to cultivate a pedestrian-oriented, mixed-use environment in the downtown and along El Camino Real that supports vibrant commercial activity, maximizes transit use, enhances quality of life, and is well-scaled with surrounding neighborhoods. This goal is supported by Policy LU-1, which encourages infill development that provides a rich mix of businesses and encourages public transit, walking, and biking. Therefore, the Specific Plan would be consistent with MSASP Policy P-LU 1.	
P-LU 2. Promote a mix of uses that support a day and evening environment in the immediate vicinity of the Millbrae Station. Uses that bring evening and weekend activity include retail shopping and services, food stores, restaurants and cafes, hotels, health clubs, and other similar uses.	Consistent. The Specific Plan includes Policy LU-2, which encourages vertical mixed-use development with ground floor retail and residential or office upper floors. Policies LU-5 and LU-6 consider the establishment of a community and neighborhood anchor that promote evening and weekend activity. Therefore, the Specific Plan would be consistent with MSASP Policy-LU 2.	
P-LU 3. Encourage residential mixed-use development with ground-floor retail spaces facing El Camino Real that support transit and downtown businesses.	Consistent . The Specific Plan includes Goal Land Use to cultivate a pedestrian-oriented, mixed-use environment in the downtown and along El Camino Real that supports vibrant commercial activity, maximizes transit use, enhances quality of life, and is well-scaled with surrounding neighborhoods. This goal is supported by Policy LU-1, which encourages infill development that provides a rich mix of businesses and encourages	

Table 3.9-5 Specific Plan Consistency with MSASP

MSASP Land Use Policy	Specific Plan Consistency
	public transit, walking, and biking. Policy LU-2 encourages vertical mixed- use development with ground floor retail and residential or office upper floors. Therefore, the Specific Plan would be consistent with MSASP Policy P-LU 3.
P-LU 4. Encourage the development of hotels in the Plan Area, especially near highway frontage.	Consistent . Specific Plan policies do not explicitly mention hotels, but Policies UD-3 and UD-4 encourage projects to orient frontages towards major roads and maximize street-activating retail and non-retail ground floor uses to create a vibrant environment. Further, the Specific Plan area is within the 2040 General Plan area, which includes Policy LU-6.2 that encourages renovation and upgrading of existing space for the development of new hotels. Therefore, the Specific Plan would be consistent with MSASP Policy P-LU 4.
P-LU 5. Strive to concentrate active ground-level uses along major pedestrian routes and at key nodes to contribute to a safe and lively pedestrian environment.	Consistent . The Specific Plan includes goal OS, which aims to establish a pedestrian-oriented public realm connected by safe pedestrian paths. This goal is supported by Policies OS-1 through OS-6, which encourage creation of a pedestrian-focused public realm in the Specific Plan area. Therefore, the Specific Plan would be consistent with MSASP Policy P-LU 5.
P-LU 6. Provide public gathering places directly adjacent to the Millbrae Station that are pedestrian friendly and minimize conflict with automobiles.	Consistent . The Specific Plan includes goal OS, which aims to establish a pedestrian-oriented public realm connected by safe pedestrian paths. This goal is supported by Policies OS-1 through OS-6, which encourage creation of a pedestrian-focused public realm in the Specific Plan area. Specifically, Policy OS-2 calls to provide a network of public open spaces that are connected by pedestrian paths. Therefore, the Specific Plan would be consistent with MSASP Policy L-LU 6.
P-LU 7. Preserve the historic Millbrae Depot for public-oriented uses.	Consistent . The Specific Plan area does not overlap with the historic Millbrae Depot. Therefore, the Specific Plan would be consistent with MSASP Policy P-LU 7.
P-LU 8. Ensure that proposed land uses are compatible with the noise environment, including rail, freeway, road traffic, and aircraft.	Consistent . The Specific Plan includes several goals and policies that seek to minimize automobile use and maximize transit use, such as Goal CP and Policies CP-11 through CP-17. Policy LU-15 calls for consistency with the aircraft noise policies and compatibility criteria in the SFO ALUCP. Therefore, the Specific Plan would be consistent with MSASP Policy P-LU 8.
P-LU 9. Encourage the development of uses that contribute to the quality of life of residents and employees, such as childcare facilities, community centers, plazas, playgrounds, and parks.	Consistent . Specific Plan policies OS-2 through OS-4 encourage the development of sustainable open space and parks, and maintenance through a parks acquisition and facilities fee. Therefore, the Specific Plan would be consistent with MSASP Policy P-LU 9.
P-LU 10. Promote Class A office development near the station and along Adrian Road to take advantage of its proximity to Highway 101, transit, and new residential development.	Consistent . The Specific Plan includes several policies that promote office development. Policy LU-2 encourages mixed-use development that includes office space. Policy LU-11 encourages the renovation and upgrading of existing office space and development of new office space along El Camino Real. Therefore, the Specific Plan would be consistent with MSASP Policy P-LU 10.
P-LU 11. Encourage land assemblage to create parcels that are attractive to mixed use and office development.	Consistent . The Specific Plan includes several policies that promote office development. Policies LU-2 encourages mixed-use development that includes office space. Policy LU-11 encourages the renovation and upgrading of existing office space and development of new office space along El Camino Real. Policy LU-8 calls for land assemble collaboration between property owners that makes the Specific Plan area attractive for development. Therefore, the Specific Plan would be consistent with MSASP Policy P-LU 11.

MSASP Land Use Policy	Specific Plan Consistency
P-LU 12. Ensure new development includes appropriate buffers for land use compatibility between new uses and existing uses.	Consistent . Specific Plan Policy UD-6 calls for a transition in scale, whereby new development has an appropriate transition between high-density, mixed use development and adjacent neighborhoods. Therefore, the Specific Plan would be consistent with MSASP Policy P-LU 12.
P-LU 13. Ensure new uses contribute to a balanced mix of uses in the Plan Area consistent with the land use regulations set forth in Chapter 5.	Consistent . The Specific Plan includes Goal Land Use to cultivate a mixed- use environment in the downtown and along El Camino Real that supports vibrant commercial activity. This goal is supported by Policy LU-1, which encourages infill development that provides a rich mix of businesses. Policy LU-2 encourages vertical mixed-use development with ground floor retail and residential or office upper floors. Therefore, the Specific Plan would be consistent with MSASP Policy P-LU 13.
P-LU 14. Ensure the build out of the Plan Area advances the social, economic, environmental, and physical goals of the community and results in a series of community benefits that address the needs of existing and future Millbrae residents.	Consistent . The Specific Plan includes Goal H and Policy H-1 to support affordable housing as a requirement for residential development, thereby advancing economic and social goals of the community. Environmental goals are supported by Goal OS and associated policies to create and maintain vibrant parks and open space. Goal UD and associated policies support physical goals of the community by establishing City image programming related to cleanliness and aesthetic impacts of buildings Therefore, the Specific Plan would be consistent with MSASP Policy P-LU 14.
Source: City of Millbrae 2021. Millbrae Station A	Area Specific Plan

As shown in Table 3.9-3, the Specific Plan would be consistent with the land use policies contained in the MSASP; and development facilitated by the Specific Plan would have a less than significant impact.

Consistency with the San Francisco International Airport ALUCP

As stated above in Section 3.9.3, *Regulatory Framework*, the SFO ALUCP includes land use/building regulations and policies to guide development and implementation. The ALUC C/CAG Board is responsible for reviewing proposed land use policy actions, which include new general plans, specific plans, zoning ordinances, plan amendments and rezonings, and land development proposals, for portions of unincorporated San Mateo County and municipalities located within Areas A and B of SFO's AIA⁸. Area A of SFO's AIA includes all of San Mateo County, all of which is overflown by aircraft flying to and from SFO at least once per week at altitudes of 10,000 feet or less above mean sea level. The City of Millbrae is adjacent to SFO, and the entirety of the city is within Area B of SFO's AIA. Area B's boundary is based upon a combination of the noise compatibility and safety zones.

The SFO ALUCP contains general policies that guide maintenance of the SFO ALUCP itself and noise and safety compatibility policies, which are addressed in detail in Section 3.7, *Hazardous & Hazardous Materials & Wildfire*. Additionally, Specific Plan Policies LU-12 through LU-15 encourage consistency with the SFO ALUCP, airport safety, and Federal Aviation Administration compliance, through City review. Accordingly, projects implemented as a result of the Specific Plan would undergo review in concert with the SFO ALUCP. Therefore, development facilitated by the Specific Plan would have a less than significant impact.

Consistency with ABAG/MTC's Plan Bay Area 2050

Plan Bay Area 2050 is a long-range land use and transportation plan for the San Francisco Bay Area region. The plan contains 11 overarching strategies with associated specific strategies that seek to

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

promote healthy, safe, and equitable communities by reducing impacts from air pollution, protecting open space and agriculture, and increasing active transportation. Section 3.6, *Greenhouse Gas Emissions and Energy*, addresses the Specific Plan's consistency with goals in the Millbrae CAP and Plan Bay Area 2050, including some strategies related to land use. Additional, strategies not included in Section 3.6, *Greenhouse Gas Emissions and Energy* and Section 3.12, *Transportation*, are addressed below in Table 3.9-4.

 t. The Specific Plan includes Goal H and Policies H-1 and H-2 to wide range of affordable housing. Therefore, the Specific Plan consistent with strategy H2. t. Specific Plan Policy LU-1 and LU-2 call for infill and mixed-opment that includes a variety of housing types. Policy LU-3 high-density and intensity development along El Camino Real., the Specific Plan would be consistent with strategy H3. t. The Specific Plan includes Goal H and Policies H-1 and H-2 to wide range of affordable housing. Therefore, the Specific Plan consistent with strategy H4.
 wide range of affordable housing. Therefore, the Specific Plan consistent with strategy H2. t. Specific Plan Policy LU-1 and LU-2 call for infill and mixed-opment that includes a variety of housing types. Policy LU-3 high-density and intensity development along El Camino Real., the Specific Plan would be consistent with strategy H3. t. The Specific Plan includes Goal H and Policies H-1 and H-2 to wide range of affordable housing. Therefore, the Specific Plan consistent with strategy H4.
opment that includes a variety of housing types. Policy LU-3 high-density and intensity development along El Camino Real. , the Specific Plan would be consistent with strategy H3. t. The Specific Plan includes Goal H and Policies H-1 and H-2 to wide range of affordable housing. Therefore, the Specific Plan consistent with strategy H4.
wide range of affordable housing. Therefore, the Specific Plan consistent with strategy H4.
t. Specific Plan Policy LU-11 encourages the renovation and of existing office space and development of new office space amino Real. Therefore, the Specific Plan would be consistent egy H6.
t. Specific Plan Policy LU-3 prioritizes high-density and levelopment along El Camino Real. Therefore, the Specific Plan consistent with strategy EC4.
t. Specific Plan policies do not explicitly mention industrial the Specific Plan area is within the 2040 General Plan area. eral Plan Policy LU-7.5 calls for designation of land for light uses. Policy ED-1.7 encourages development of key light sites. Therefore, the Specific Plan would be consistent with C6.

Table 3.9-6 Specific Plan Consistency with Plan Bay Area 2050 Goals

As shown in Table 3.9-4, the Specific Plan would be consistent with the goals contained in the Plan Bay Area 2050. As concluded within this impact discussion, as well as discussion in Section 3.2, *Air Quality*, and Section 3.6, *Greenhouse Gas Emissions and Energy*, implementation of the Specific Plan would be consistent with applicable adopted plans, regulations, or policies. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Effects of Population Growth

Significance Criterion c:	Would the proposed plans induce substantial unplanned population
	growth in an area, either directly (for example, by proposing new homes
	and businesses) or indirectly (for example, through extension of roads or
	other infrastructure)?

Impact LU-3 IMPLEMENTATION OF THE PROPOSED PLANS WOULD FACILITATE THE CONSTRUCTION OF NEW HOUSING IN MILLBRAE. PROPOSED DEVELOPMENT COULD RESULT IN AN INCREASE IN POPULATION THAT WOULD EXCEED ABAG POPULATION FORECASTS BY 4.0 PERCENT BY 2040. HOWEVER, THE PROPOSED PLANS ARE INTENDED TO ACCOMMODATE AND PLAN FOR POPULATION GROWTH AND INCLUDES POLICIES TO MANAGE GROWTH AND DEVELOPMENT. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Impacts related to inducing substantial unplanned population growth in an area, either directly or indirectly are limited to operational impacts. No respective construction impacts would occur from development facilitated by the 2040 General Plan or the Specific Plan.

Operation

Table 3.9-7 presents population, dwelling units, and employment projections through 2040 for Millbrae, based on Plan Bay Area 2040 estimates. The projections suggest that the City's population will grow approximately 18 percent between 2021 and 2040. This translates to an estimated 4,096 new residents by 2040. New dwelling units are expected to increase 16 percent between 2021 and 2040, for a total of 11,413 new units. Likewise, increased land uses and cultivation of a commercial business mix of uses that better serve residents needs and attract visitors is anticipated to increase employment by approximately 76 percent from 2021 levels, for a total of approximately 5,025 new jobs by 2040. This would increase the City's jobs-housing ratio by 0.39.

Millbrae	2021	2040	Change 2021 to 2040	Percent Change 2021 to 2040
Population	22,509	26,605	4,096	18%
Dwelling Units	8,637	10,050	1,413	16%
Jobs	6,570	11,595	5,025	76%
Jobs-Household Ratio	0.76	1.15	0.39	56%

Table 3.9-7	Millbrae Population, Dwelling Units, and Employment
	Minibiae i operanon, bitening ennis, and Employment

Sources: CDF 2021. E-5 Population and Housing Estimates for Cities, Counties, and the State 2010-2021; ABAG. 2019. Projections 2040 by Jurisdiction; ABAG. 2021. Plan Bay Area 2040 Growth Pattern

2040 GENERAL PLAN

Goal Land Use-1 and associated policies in the Land Use Element of the 2040 General Plan, listed below, would concentrate higher density and intensity development around Millbrae Station and within the Specific Plan area and encourage development on underutilized infill properties. Implementation of this 2040 General Plan goal and policy would ensure planned growth in Millbrae.

- Goal Land Use-1 Integrate new development with the fabric of the surrounding neighborhoods to create a cohesive community.
 - Policy LU-1.1 Prioritize New Development in Specific Plan Areas. The City shall prioritize higher density and intensity development around the Millbrae Station, along El Camino Real, and in Downtown. The City shall use specific plans for these areas to ensure new development is context sensitive, contributes to a positive city image, and preserves the positive qualities of surrounding neighborhoods.
 - **Policy LU-1.2** Land Uses that Maximize Transit. The City shall encourage higher-intensity development around the Millbrae Station and along the El Camino Real corridor that maximizes transit use.
 - **Policy LU-1.5 Revitalization and Redevelopment.** The City shall encourage property owners citywide to contribute to the community by revitalizing and redeveloping abandoned, obsolete, or underutilized properties.

Because the 2040 General Plan is designed for planned and orderly growth, and residential development would be completed in accordance with State law, development facilitated by and in accordance with the 2040 General Plan would not directly or indirectly induce substantial unplanned growth in the City. Therefore, impacts of development facilitated by the 2040 General Plan related to substantial unplanned population growth would be less than significant.

SPECIFIC PLAN

Development facilitated by the Specific Plan would result in approximately 1,880 net new residential units in the City through 2040. This additional housing, coupled with ongoing and planned development, would lead to an increase of approximately 5,151 net new residents in the City from 2021 to 2040, based on an estimated 2.74 persons per household. In the unlikely event that all potential buildout of the Specific Plan occurs, the total population of the city in 2040 would be 27,660, which is 4.0 percent above ABAG's 2040 population forecast of 26,605, as shown in Table 3.9-7. However, the ABAG growth projection is based on the land use assumptions in the 1998

General Plan. Growth anticipated under the Specific Plan is intended in part to meet regional housing needs over the long term. Although the Specific Plan would facilitate development beyond what is forecasted by ABAG, it would bring the forecasts for the Millbrae General Plan and RTP/SCS into consistency when the RTP/SCS is next updated to reflect new forecasts for each city in the region.

Given that the State is currently in an ongoing housing crisis due to an insufficient housing supply, the additional units under the Specific Plan would further assist in addressing the existing crisis and meeting the housing needs of Millbrae's communities.

The increase in affordable housing units would provide housing opportunities in proximity to jobs for those employed in San Mateo County that meet these household income categories. As the City is job-poor and most of those employed in the City commute to areas near Millbrae, such as San Francisco, affordable housing units would provide for a better balance of jobs and housing in the region.

Additionally, Goal Land Use and associated policies in the Specific Plan, listed below, would concentrate planned residential development and associated population growth in infill areas. Implementation with this goal and associated policies would ensure planned growth in the Specific Plan area that is consistent with the 2040 General Plan.

- Goal Land Use Cultivate a pedestrian oriented, mixed-use environment in the downtown and along El Camino Real that supports vibrant commercial activity, maximizes transit use, enhances quality of life, and is well-scaled with surrounding neighborhoods
 - **Policy LU-1** Infill Development. The City shall support high quality infill development that provides a rich mix of businesses, housing types, and community-serving uses and encourage public transit, walking, and biking.
 - **Policy LU-4 Downtown.** The City shall encourage a mix of small- scale, infill development with community gathering places that serves residents and attracts more pedestrian traffic, while enhancing the charming character of downtown.

As discussed in Section 3.9.2, Millbrae has a current jobs-household ratio of 0.76, which means that workers must travel to other communities to find employment. Growth under the Specific Plan would result in a more balanced jobs-household ratio in 2040 by increasing the number of jobs available in Millbrae (Table 3.9-7); specifically with the new Downtown Mixed-use and Neighborhood Commercial Mixed-use land designations, which allow for development of new offices. Therefore, such growth would not result in substantial adverse effects associated with an increased imbalance of jobs and housing in the City.

Finally, one purpose of the Specific Plan is to direct future development in such a way as to minimize the impacts of growth by emphasizing the intensification and reuse of already developed areas, thus minimizing pressure to develop on the remaining open space in the city and directing growth and redevelopment to infill areas, consistent with the Specific Plan Goal Land Use and Policies LU-1 and LU-4 listed above. Because the Specific Plan is designed for planned and orderly growth, and residential development would be completed in accordance with State law, development facilitated by and in accordance with the Specific Plan would not directly or indirectly induce substantial unplanned growth in the City. Therefore, impacts of development facilitated by the Specific Plan related to substantial unplanned population growth would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Effects on Population or Housing

Significance Criterion d: Would the plans displace substantial numbers of existing people or
housing, necessitating the construction of replacement housing
elsewhere?

Impact LU-4 DEVELOPMENT FACILITATED BY THE PROPOSED PLANS WOULD NOT RESULT IN THE DISPLACEMENT OF SUBSTANTIAL NUMBERS OF HOUSING OR PEOPLE. THE PROPOSED PLANS WOULD FACILITATE THE DEVELOPMENT OF NEW HOUSING IN ACCORDANCE WITH STATE AND LOCAL HOUSING REQUIREMENTS, WHILE PRESERVING EXISTING RESIDENTIAL NEIGHBORHOODS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Impacts related to displacement of substantial existing people or housing are limited to operational impacts. No respective construction impacts would occur from development facilitated by the proposed plans.

Operation

2040 GENERAL PLAN

Most of the proposed land use changes of the 2040 General Plan area would occur under the Specific Plan. No residential land use changes would take place outside of the Specific Plan area. The entirety of the Specific Plan area falls within the General Plan area; as such, the analysis below under Specific Plan would also apply to the 2040 General Plan. Additionally, 2040 General Plan Goal Land Use-1 and associated policies listed above under Impact LU-3 would concentrate higher density and intensity development around Millbrae Station and the Specific Plan area and encourage development on underutilized infill properties. Therefore, impacts of development facilitated by the 2040 General Plan related to displacement of existing people or housing would be less than significant.

SPECIFIC PLAN

"Substantial" displacement would occur if allowed land uses would displace more residences than would be accommodated through growth facilitated by the Specific Plan. The Specific Plan would accommodate new development in the Specific Plan area under new land use designations like Downtown Mixed-use, Corridor Mixed-use, Residential-focused Mixed-use and Neighborhood Commercial Mixed-use. Full buildout of the Specific Plan would result in 1,880 net new housing units by 2040. The types of housing units anticipated under the Specific Plan would generally fall into the following categories of development projects: single-family, multi-family residential, and/or mixed-use development on vacant sites, redevelopment of existing nonresidential and residential sites that would allow residential use or higher density residential use. Focusing development in the Specific Plan area would not result in significant displacement of existing residences in order to accommodate the planned increase in development intensity considering that existing residences are not proposed for demolition. In addition, Goal Land Use and associated policies, listed under Impact LU-1, promote infill development and redevelopment of underutilized parcels and would provide additional housing on vacant sites.

In addition, the Specific Plan would facilitate the development of 1,880 net new dwelling units throughout the Specific Plan area. Therefore, the Specific Plan would not result in the net loss or displacement of housing, necessitating the construction of replacement housing elsewhere, and impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

3.9.5 Cumulative Impacts

The geographic scope of the cumulative land use/planning and population/housing analysis is the City of Millbrae and adjacent city and airport planning areas. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, Environmental Impact Analysis) located in Millbrae, Burlingame, South San Francisco, and at the San Francisco International Airport in addition to the proposed plans.

Divide a Community

Development facilitated by the proposed plans in conjunction with the cumulative plans and projects listed in Table 3-1 would result in the development of residential, retail, office, hotel, industrial, airport, and bicycle/pedestrian uses. The cumulative plans and projects do not propose the type of large or linear construction that could reduce mobility within an existing community and the surrounding area and would occur in an urban environment. Therefore, the cumulative impact related to potential to divide an existing community would be less than significant.

Conflict with Land Use Plan, Policy, or Regulation

Land use decisions for both the proposed plans and for the other cumulative plans and projects listed in Table 3-1 are made at the City level. Development within the City of Millbrae is governed by the Millbrae General Plan and Millbrae Municipal Code, which ensure logical and orderly land use development and require discretionary review to ensure that projects do not result in land use environmental impacts due to inconsistency with the General Plan and other regulations. Cumulative development projects in Millbrae would be required to demonstrate consistency with the proposed 2040 General Plan and applicable codes, ordinances, and policies. This would ensure that these projects comply with applicable planning regulations. The proposed plans have been determined to be consistent with the City's policy. Therefore, the cumulative impact related to potential conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant.

Population Growth

Cumulative projects listed in Table 3-1 in conjunction with the proposed plans would add residents to the cities of Millbrae, Burlingame, and South San Francisco. The CDF estimates that the total population of Millbrae was 22,509 as of January 1, 2021.9 The development of other cumulative plans and projects, specifically the Millbrae Station Area Specific Plan, South San Francisco 2040 General Plan, and Burlingame 2040 General Plan include residential projects that would add approximately 18,655 housing units resulting in approximately 46,638 residents assuming 2.5 persons per household ratio. This increase in population would be in addition to the approximately 4,096 residents associated with the proposed plan for a total cumulative population increase of 50,734 residents. The proposed plans estimate Millbrae at buildout to have a population of 26,605 people by 2040. The proposed plans would account for 8.1 percent of the expected population growth by 2040 among the combined cumulative plans and projects. Because the proposed plans are designed for planned and orderly growth, and residential development would be completed in accordance with State law, development facilitated by and in accordance with the proposed plans would not directly or indirectly induce substantial unplanned growth in Millbrae. As such, while other cumulative plans and projects would result in direct population growth, implementation of the proposed plans, in conjunction with other cumulative projects, would result in a less than significant cumulative impact associated with direct population growth, as this growth is planned for by the City of Millbrae. Furthermore, cumulative plans and projects are expected to generate employment opportunities. Total employment in Millbrae was 9,505 in 2020.10 The cumulative plans and projects are estimated to increase employment, and the proposed plans are expected to increase jobs in Millbrae by 5,025. Employees associated with the cumulative plans and projects would be expected to be drawn from the local labor force. The proposed plans are not expected to employ new employees. As such, there would not be substantial indirect population growth associated with implementation of the cumulative plans and projects. Therefore, cumulative impacts related to direct and indirect population growth would be considered less than significant.

Population/Housing Displacement

Cumulative plans and projects listed in Table 3-1 in conjunction with implementation of the proposed plans would add residential units to Millbrae. The plans and projects listed in Table 3-1 would not remove existing housing and rather would add approximately 18,655 housing units. Furthermore, the development facilitated by the proposed plans would add approximately 1,413 housing units to the Millbrae housing stock. In addition, implementation of the proposed plans would not require the removal of any homes and would not displace any people. As such, implementation of the proposed plans, in conjunction with other cumulative plans and projects, would not displace housing or people such that would necessitate the construction of additional housing elsewhere. Therefore, no cumulative impact related to displacement of housing or people would occur.

Overall Level of Cumulative Significance

Less than significant

⁹ California Department of Finance. 2021. E-5 Population and Housing Estimates for Cities, Counties, and the State 2010-2021. Available: https://dof.ca.gov/Forecasting/Demographics/Estimates/. (accessed March 2022).

¹⁰ Association of Bay Area Governments. 2019. Projections 2040 by Jurisdiction. Available:

https://data.bayareametro.gov/Demography/Projections-2040-by-Jurisdiction/grqz-amra. (accessed March 2022).

3.10 Noise

3.10.1 Introduction

This section describes the existing conditions related to noise and vibration within the General Plan and Specific Plan areas as well as the regulatory framework. This section also evaluates the possible impacts related to noise and vibration that could result from implementation of the 2040 General Plan and Specific Plan. Information included in this section is based on the Millbrae General Plan and Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (or SFO) as well as vehicle miles traveled (VMT) data drawn from the Millbrae 2040 General Plan and Downtown and El Camino Real Specific Plan Transportation Impact Analysis (TIA), which is included as Appendix A to this EIR.

3.10.2 Environmental Setting

Characteristics of Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment.¹ Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz and less sensitive to frequencies around and below 100 Hertz. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dBA; reducing the energy in half would result in a 3 dBA decrease². Table 3.10-9 shows some representative noise sources and their corresponding noise levels in dBA.

Indoor Noise Source	Noise Level (dBA)	Outdoor Noise Sources
(Threshold of Hearing in Laboratory)	0	_
Library	30	Quiet Rural Nighttime
Refrigerator Humming	40	Quiet Suburban Nighttime
Quiet Office	50	Quiet Urban Daytime
Normal Conversation at 3 feet	60	Normal Conversation at 3 feet
Vacuum Cleaner at 10 feet	70	Gas Lawn Mower at 100 feet
Hair Dryer at 1 foot	80	Freight Train at 50 feet
Food Blender at 3 feet	90	Heavy-duty Truck at 50 feet
Inside Subway Train (New York)	100	Jet Takeoff at 2,000 feet
Smoke Detector Alarm at 3 feet	110	Unmuffled Motorcycle

Table 3.10-1 Typical A-Weighted Noise Levels

¹ California Department of Transportation (Caltrans). 2013. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. (CT-HWANP-RT-13-069.25.2) September. Available at: http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf

² Crocker, Malcom. 2007. Handbook of Noise and Vibration Control Book, ISBN: 978-0-471-39599-7, Wiley-VCH, October.

Indoor Noise Source	Noise Level (dBA)	Outdoor Noise Sources
Rock Band near stage	120	Chainsaw at 3 feet
_	130	Military Jet Takeoff at 50 feet
_	140	(Threshold of Pain)

Human perception of noise has no simple correlation with sound energy: the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease (i.e., twice the sound energy); that a change of 5 dBA is readily perceptible (8 times the sound energy); and that an increase (or decrease) of 10 dBA sounds twice (half) as loud (10.5x the sound energy).

Sound changes in both level and frequency spectrum as it travels from the source to the receptor. The most obvious change is the decrease in level as the distance from the source increases. The manner in which noise reduces with distance depends on factors such as the type of sources (e.g., point or line, the path the sound will travel, site conditions, and obstructions). Noise levels from a point source typically attenuate, or drop off, at a rate of 6 dBA per doubling of distance (e.g., construction, industrial machinery, ventilation units). Noise from a line source (e.g., roadway, pipeline, railroad) typically attenuates at about 3 dBA per doubling of distance. The propagation of noise is also affected by the intervening ground, known as ground absorption. A hard site, such as a parking lot or smooth body of water, receives no additional ground attenuation and the changes in noise levels with distance (drop-off rate) result from simply the geometric spreading of the source. An additional ground attenuation value of 1.5 dBA per doubling of distance applies to a soft site (e.g., soft dirt, grass, or scattered bushes and trees). Noise levels may also be reduced by intervening structures. The amount of attenuation provided by this "shielding" depends on the size of the object and the frequencies of the noise levels. Natural terrain features such as hills and dense woods, and man-made features such as buildings and walls, can substantially alter noise levels. Generally, any large structure blocking the line of sight will provide at least a 5 -dBA reduction in source noise levels at the receptor.³ Structures can substantially reduce exposure to noise as well. The FHWA's guidelines indicate that modern building construction generally provides an exterior-tointerior noise level reduction of 20 to 35 dBA with closed windows.

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important factors of project noise impact. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. One of the most frequently used noise metrics is the equivalent noise level (L_{eq}) ; it considers both duration and sound power level. L_{eq} is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over time. Typically, L_{eq} is summed over a one-hour period. L_{max} is the highest root mean squared (RMS) sound pressure level within the sampling period, and L_{min} is the lowest RMS sound pressure level within the measuring period.

Noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using Day-Night Average Level (L_{dn}), which is the 24-hour average noise level with a +10 dBA penalty for noise occurring during nighttime (10:00 p.m. to

³ Federal Highway Administration (FHWA). 2011. *Highway Traffic Noise: Analysis and Abatement Guidance*. (FHWAHEP-10-025). December. Available at: https://www.codot.gov/programs/environmental/noise/assets/fhwa-noise-guidance-dec-2011

7:00 a.m.) hours; it is also measured using Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a +5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a +10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. Noise levels described by L_{dn} and CNEL usually differ by about 1 dBA or less. The relationship between the peak-hour L_{eq} value and the L_{dn}/CNEL depends on the distribution of traffic during the day, evening, and night. Quiet suburban areas typically have CNEL noise levels in the range of 40 to 50 dBA, while areas near arterial streets are in the 50 to 60-plus CNEL range. Normal conversational levels are in the 60 to 65dBA L_{eg} range; ambient noise levels greater than 65 dBA L_{eg} can interrupt conversations.⁴ Table 3.10-2 briefly defines measurement descriptors and other sound terminology used in this section.

Term	Definition
Sound	A vibratory disturbance created by a vibrating object which, when transmitted by pressure waves through a medium such as air, can be detected by a receiving mechanism such as the human ear or a microphone.
Noise	Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
Ambient Noise	The composite of noise from all sources near and far in a given environment.
Decibel (dB)	A unitless measure of sound on a logarithmic scale, which represents the squared ratio of sound-pressure amplitude to a reference sound pressure. The reference pressure is 20 micropascals, representing the threshold of human hearing (0 dB).
A-Weighted Decibel (dBA)	An overall frequency-weighted sound level that approximates the frequency response of the human ear.
Equivalent Noise Level (L _{eq})	The average sound energy occurring over a specified time period. In effect, L _{eq} is the steady-state sound level that in a stated period would contain the same acoustical energy as the time-varying sound that actually occurs during the same period.
Ambient Noise	The composite of noise from all sources near and far in a given environment.
Maximum and Minimum Noise Levels (L _{max} and L _{min})	The maximum or minimum instantaneous sound level measured during a measurement period.
Day-Night Level (DNL or L _{dn})	The energy average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the A-weighted sound levels occurring between 10:00 p.m. and 7:00 a.m. (nighttime).
Community Noise Equivalent Level (CNEL)	The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added to the A-weighted sound levels occurring between 7:00 p.m. and 10:00 p.m. and 10 dB added to the A-weighted sound levels occurring between 10:00 p.m. and 7:00 a.m.

Table 3.10-2 Sound Terminology

Characteristics of Vibration

Groundborne vibration of concern for CEQA purposes consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of Hz. The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne

⁴ Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment*. November. Available at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessmentmanual-fta-report-no-0123_0.pdf

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vibration that can be felt by the human body starts from a low frequency of less than 1 Hz and goes to a high of about 200 Hz.

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source. Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Discontinuities in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances.⁵ When a building is affected by vibration, a ground-to-foundation coupling loss will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may actually amplify the vibration level due to structural resonances of the floors and walls.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or RMS vibration velocity. The PPV and RMS velocity are normally described in inches per second. PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of blasting vibration because it is related to the stresses that are experienced by buildings. The American Association of State Highway and Transportation Officials (AASHTO) has determined vibration levels with potential to damage nearby buildings and structures; these levels are identified in Table 3.10-3.

Type of Situation	Limiting Velocity (in/sec)
Historic sites or other critical locations	0.1
Residential buildings, plastered walls	0.2–0.3
Residential buildings in good repair with gypsum board walls	0.4–0.5
Engineered structures, without plaster	1.0–1.5
Source: Caltrans, 2020 Transportation and Construction Vibration Guidance Manual. (CT-HWANP-RT-20-365.01.01)	

Table 3.10-3	AASHTO Maximum	Vibration Levels f	or Preventing Damage
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Source: Caltrans. 2020 Transportation and Construction Vibration Guidance Manual. (CT-HWANP-RT-20-365.01.01) September. Available at: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf.

Numerous studies have been conducted to characterize the human response to vibration. The vibration annoyance potential criteria recommended for use by Caltrans, which are based on the general human response to different levels of groundborne vibration velocity levels, are described in Table 3.10-4.

⁵ Caltrans. 2020 *Transportation and Construction Vibration Guidance Manual*. (CT-HWANP-RT-20-365.01.01) September. Available: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf.

Table 3.10-4 Vibration Annoyance Potential Criteria

	Vibration Level (in/sec PPV)		
Human Response	Transient Sources	Continuous/ Frequent Intermittent Sources ¹	
Severe	2.0	0.4	
Strongly perceptible	0.9	0.10	
Distinctly perceptible	0.25	0.04	
Barely perceptible	0.04	0.01	

in/sec = inches per second; PPV = peak particle velocity

Source: Caltrans 2020

¹ Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Noise-Sensitive Land Uses

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Noise-sensitive land uses are typically defined as single and multi-family residential; hotels and motels; group homes, hospital and extended medical facilities; churches; schools and other learning institutions; and libraries. Sensitive land uses generally should not be subjected to noise levels that would be considered intrusive in character.

General Plan Area

Noise-sensitive land uses are located throughout Millbrae, as it is a predominantly residential city. Residential development is located between SR 82 and I-280, with residential development also located between SR 82 and the eastern edge of Millbrae (border with SFO). Millbrae also includes noise-sensitive land uses such as hotels and motels; group homes, churches; schools and other learning institutions; and libraries.

Specific Plan Area

The Specific Plan area is a mostly commercial corridor within Millbrae. Noise-sensitive land uses in the Specific Plan area include hotels, motels, and single- and multi-family residential. Noise-sensitive land uses proximate to the Specific Plan area include single- and multi-family residential neighborhoods to the west and east.

Existing Noise Conditions and Sources

General Plan Area

The predominant source of noise in Millbrae, as in most communities, is motor vehicles. Motor vehicle noise is characterized by a high number of individual events that can create a sustained noise level in proximity to noise-sensitive uses. Roadways with the highest traffic volumes and speeds produce the highest noise levels. Rail noise (BART and Caltrain) and airport noise associated with SFO operations are additional noise sources in Millbrae. The roadways in Millbrae with the highest traffic volumes and, thus, the highest noise levels would be Interstate 280, Highway 82, and Highway 101.

The BART and Caltrain systems run on a rail line in between, and parallel to, Highway 82 and Highway 101. The Millbrae train station is located in the southeastern area of Millbrae. BART and

Caltrain rains generate noise as they run throughout the day, starting in early morning and continuing until around midnight.

SFO is located adjacent to the northeastern portion of Millbrae, with flightpaths from the SFO southwestern to northeastern runways located over Millbrae. Aircraft following these flightpaths generate noise over Millbrae.

Specific Plan Area

The predominant source of noise in the Specific Plan area is motor vehicles from Highway 82 and Highway 101. In addition, the Specific Plan area is located near the BART and Caltrain rail line as well as SFO, and noise-sensitive receptors in this area are exposed to rail and aircraft noise.

3.10.3 Regulatory Framework

Federal Regulations

Federal Transit Administration Construction Noise Impact Assessment Guidance

The Federal Transit Administration (FTA) provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction in their *Transit and Noise Vibration Impact Assessment Manual*.⁶ For residential, commercial, and industrial uses, the daytime noise threshold is 80 dBA L_{eq}, 85 dBA L_{eq}, and 90 dBA L_{eq} for an 8-hour period, respectively.

State Regulations

California Code of Regulations, Title 24 – Interior Noise Levels

Title 24 of the California Code of Regulations codifies sound transmission control requirements establishing uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwellings other than single-family dwellings. Specifically, Section 1207.4 in Title 24 states that interior noise levels attributable to exterior noise sources shall not exceed 45 dBA CNEL/L_{dn} in any habitable room of a new building.

Local Regulations

Millbrae General Plan

The current Millbrae General Plan contains land use compatibility categories for community noise exposure, stationary noise source limits, and policies related to noise, but the categories for noise exposure, stationary noise source limits, and policies would be replaced by the proposed 2040 General Plan.

Millbrae Municipal Code

The Millbrae Municipal Code does not contain a specific noise ordinance; however, sections in the Millbrae Municipal Code related to noise include the following:

⁶ Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment*. November. Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessmentmanual-fta-report-no-0123_0.pdf

- Chapter 6.25, Section 6.25.050.F.9.b: Unlawful property nuisances. Emanation of noise or vibrations on a continuous and regular basis of such a loud, unusual, unnecessary, penetrating, lengthy or untimely nature as to unreasonably disturb, annoy, injure or interfere with or endanger the comfort, repose, health, peace, safety or welfare of users of neighboring property.
- Section 9.05.040: Hours of construction. The hours of noise generating construction activity shall be limited to the hours of 7:30 AM to 7:00 PM Monday through Friday, 8:00 AM to 6:00 PM Saturdays and 9:00 AM to 6:00 PM on Sundays and Holidays. Work outside of these hours may be approved by the Building Official when requested, in writing, a minimum of 48 hours in advance.
- Section 9.05.050: Protection from airport noise. Any residential building located within the 65 CNEL Zone, (as determined by the 2012 Noise Contour Map, as published in the C/CAG Comprehensive Airport Land Use Compatibility Plan) which is either newly constructed or renovated at a cost equal to or greater than 25% of the valuation (as assessed by the County Assessor) shall meet a Sound Transmission Class (STC) Rating of 35.

3.10.4 Impacts and Mitigation Measures

Significance Criteria

The City of Millbrae utilizes the following 2022 CEQA Guidelines Appendix G significance criteria questions related to Noise.

Would the 2040 General Plan or Specific Plan:

- a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- b) Cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?⁷
- c) Generate excessive groundborne vibration or groundborne noise levels?
- d) If located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?

Approach to Analysis

Construction Noise

This section estimates construction noise from development facilitated by the 2040 General Plan based on reference noise levels for various pieces of construction equipment reported by the FTA's *Noise and Vibration Impact Assessment*. Construction equipment may operate as close as 10 feet from nearby noise-sensitive receptors; however, over the course of a normal construction day, the equipment would typically move back and forth across a construction site and average a further distance from noise-sensitive receptors. For analysis purposes, a distance of 25 feet was used to demonstrate typical construction noise levels. Construction noise estimates do not account for the

⁷ This significance criteria question is from the Land Use and Planning section of the CEQA Guidelines Appendix G checklist questions. However, since this question addresses impacts related to conflicts with land use plans, which would include plan- and project-related conflicts related to noise land use compatibility standards of the Millbrae General Plan Health, Safety, and Hazardous Materials Element, it is also included here.

presence of intervening structures or topography, which could reduce noise levels at receptor locations.

Stationary On-Site Operational Noise

Stationary noise (i.e., on-site operational noise) were analyzed in context of typical mechanical equipment on commercial, industrial, residential and mixed-use development such as heating, ventilation, and air conditioning (HVAC) units.

Mobile Off-site Operational (Traffic) Noise

Projected vehicle miles traveled volumes in the year 2040, included in the TIA prepared for the proposed plans (see Appendix A), were used to qualitatively describe future noise levels resulting from vehicle miles traveled associated with the proposed plans.

Aviation Noise

The airport noise contours for SFO with respect to Millbrae General Plan and Specific Plan areas were utilized to determine potential impacts from exposure to aviation-related noise.

Groundborne Vibration

Development of the nature facilitated by the 2040 General Plan or Specific Plan would not include substantial vibration sources associated with operation. Construction activities have the greatest potential to generate groundborne vibration affecting nearby noise-sensitive receptors. Although groundborne vibration is sometimes noticeable in outdoor environments, it is typically negligible to people outdoors. As such, vibration levels are assessed at structures of an affected property.

Noise Land Use Compatibility

To determine the land use combability with noise standards for the 2040 General Plan and Specific Plan, noise contours for major roadway traffic, rail noise, and airport noise were modeled (see Impact NOI-2, below, for the noise contours map over Millbrae City limits figure).

- For roadway noise contours, traffic volumes on the major roadways (Interstate 280, Highway, and Highway 82) were taken from Caltrans traffic volumes.⁸ The noise contours were calculated using the Department Housing and Urban Development's Day/Night Noise Level Electronic Assessment Tool.⁹ Topography and building attenuation were not accounted for in modeling, and therefore roadway noise contours are conservative.
- Rail noise contours were modeled in the FTA's CREATE Rail Noise Model. For BART, train data was obtained from BART schedules using three lines that travel through Millbrae (Richmond to Millbrae/SFO on the Red Line and Antioch to Millbrae/SFO on the yellow line).¹⁰ For Caltrain, the weekday schedules for the northbound trains to San Francisco and southbound trains from San Francisco were used.¹¹ The line has limited freight train activity; it was assumed freight trains would contain 15 cars and would pass by the site two times per day.¹² Topography and building

⁸ Caltrans. 2022. Traffic Census Program. Available at: https://dot.ca.gov/programs/traffic-operations/census

⁹ Department Housing and Urban Development. 2022. Day/Night Noise Level Electronic Assessment Tool. Available at:

https://www.hudexchange.info/programs/environmental-review/daynight-noise-level-electronic-assessment-tool/

¹⁰ Bay Area Rapid Transit (BART). 2022. Schedules. Available at: https://www.bart.gov/schedules

¹¹ Caltrain. 2022. Weekday Printer-Friendly Caltrain Schedule. Available at:

 $https://www.caltrain.com/Assets/Assets/pdfs/CT_PrinterFriendlyTimetable_03-14-2022.pdf?v=2$

¹² Caltrain HSR Compatibility Blog. 2009. https://caltrain-hsr.blogspot.com/2009/03/freight-on-peninsula.html. March 8.

attenuation were not accounted for in modeling, and therefore rail noise contours are conservative.

Airport noise contours for SFO were taken from the SFO Aircraft Noise and Flight Tracking tool.¹³

EIR Scoping Comments Consideration

This section also addressed comments received in response to the EIR NOP related to noise contours, safety compatibility zones, and Airport Land Use Compatibility Plan for the Environs of SFO consistency. Assessment of noise land use compatibility, including noise contours, as well as assessment of exposure of people to excessive noise levels within the Airport Land Use Compatibility Plan is discussed under Impact NOI-2.

Specific Thresholds of Significance

For purposes of this analysis, the following thresholds of significance are used to evaluate the significance of noise and vibration resulting from implementation of the proposed plans.

- Construction Noise: FTA criteria for construction noise levels are used in this analysis. A plan or project would result in the generation of a substantial temporary increase in ambient noise levels if construction noise would exceed the FTA daytime criteria of 80 dBA L_{eq}, 85 dBA L_{eq}, and 90 dBA L_{eq} for an 8-hour period for residential, commercial, and industrial land uses, respectively.
- Stationary On-site Operational Noise: In lieu of City-specific standards and for purposes of this analysis, the previous Millbrae General Plan operational noise standard of 55 dBA L_{eq} from 7 a.m. to 10 p.m. and 45 dBA L_{eq} from 10 p.m. to 7 a.m. is used for stationary source noise impacts.
- Mobile Off-site (Traffic) Operational Noise: For purposes of this analysis, a significant impact would occur if project-related traffic increases the ambient noise environment of noise-sensitive land uses by 3 dBA or more if the locations are subject to noise levels in excess of conditionally compatible levels, or by 5 dBA or more if the locations are not subject to noise levels in excess of the conditionally acceptable levels identified in the 2040 General Plan.
- Exposure to Aircraft Noise: For a plan or project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, if the plan or project exposes people residing or working in the project area to excessive noise levels such as noise levels exceeding normally acceptable noise levels in the 2040 General Plan.
- Groundborne Vibration: Caltrans criteria for vibration levels are used in this analysis. Vibration levels equal to or below 0.4 in./sec. PPV at residential structures would prevent structural damage for most residential building and vibration levels equal to or less than 1.0 in./sec. PPV would prevent damage to more substantial construction, such as high-rise, commercial, and industrial buildings. For human annoyance, the vibration level threshold at which transient, or temporary, vibration sources are considered to be distinctly perceptible is 0.25 in./sec. PPV.
- Noise Land Use Compatibility: The noise land use compatibility limits from the 2040 General Plan (see Table 3.10-5) are used to determine impacts for future development facilitated by the 2040 General Plan and Specific Plan.

¹³ San Francisco International Airport. 2022. Airport Noise and Flight Tracking. Available at: https://www.flysfo.com/community/noise/live-flight-tracking.

Table 3 10-5	Millbrae Land Use Com	patibility for Communit	v Noise Environments

Land Use Category	Highest Level of Exterior Noise Exposure that is Regarded as Normally Acceptable ¹ (L _{dn} ² or CNEL ³ , dB)	Conditionally Acceptable Levels of Exterior Noise Exposure ⁴
Residential: Single-Family Homes, Duplexes, Mobile Homes	60	60-70
Residential: Townhomes, Multi- Family Apartments, Condominiums	65	65-70
Urban Residential Infill ⁵ and Mixed-Use Projects ⁶	70	70-75
Lodging: Motels, Hotels	65	65-70
Schools, Libraries, Churches, Hospitals, Nursing Homes	70	N/A
Auditoriums, Concert Halls, Amphitheaters	Threshold and Mitigation based on site-sp	pecific study (see Policy HSHM-10.4)
Sports Arenas, Outdoor Spectator Sports	Threshold and Mitigation based on site-sp	pecific study (see Policy HSHM-10.4)
Playgrounds, Neighborhood Parks	70	N/A
Golf Courses, Riding Stables, Water Recreation, Cemeteries	75	N/A
Office Buildings: Business, Commercial, and Professional	70	70-75
Industrial: Manufacturing, Utilities, and Agriculture	75	75-80

Source: Millbrae, City of. 2022. Millbrae 2040 General Plan.

- 1 As defined in the *State of California 2017 General Plan Guidelines,* "Normally Acceptable" means that the specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise reduction requirements.
- 2 L_{dn}, or Day Night Average, is an average 24-hour noise measurement that factors day and night noise levels.
- 3 CNEL, or Community Noise Equivalent Level, measurements are a weighted average of sound levels gathered throughout a 24hour period.
- 4 Conditionally Acceptable" means that for the given land use type, new construction or development should be undertaken only after a detailed study of the noise exposure and reduction requirements for the project has been completed and the applicant has included appropriate noise reduction measures in the project design to the fullest extent feasible.
- 5 Urban residential infill includes all types of residential development projects within Priority Development Areas (such as Downtown and the Millbrae Station Area) and along major corridors (i.e., El Camino Real).
- 6 Mixed-Use Projects include all mixed-use developments throughout the city of Millbrae.

N/A = Projects are not permitted within these land uses above the "Normally Acceptable" exposure level.

Impact Evaluation

Ambient Noise Compared to Standards

Significance Criterion a:	Would the proposed plans generate a substantial temporary or permanent
	increase in ambient noise levels in the vicinity of the project in excess of
	standards established in the local general plan or noise ordinance, or
	applicable standards of other agencies?

Impact NOI-1 IMPLEMENTATION OF THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD TEMPORARILY GENERATE INCREASED NOISE LEVELS POTENTIALLY AFFECTING NEARBY NOISE-SENSITIVE LAND USES, INTRODUCE NEW ON-SITE NOISE SOURCES ASSOCIATED WITH RESIDENTIAL AND COMMERCIAL LAND USES, AND CONTRIBUTE TO INCREASES IN TRAFFIC NOISE. CONSTRUCTION AND STATIONARY OPERATIONAL NOISE COULD EXCEED STANDARDS. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE EVEN WITH MITIGATION.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

Noise from individual construction projects facilitated by the 2040 General Plan and Specific Plan would temporarily increase noise levels at nearby noise-sensitive receptors. Since at this stage of planning project-level details are not available for future projects that would be carried out under the 2040 General Plan and Specific Plan, it is not possible to determine exact noise levels, locations, or time periods for construction of such projects, or construction noise at adjacent properties. However, noise estimates for typical construction activities have been provided below.

Construction activities would generate noise from phases such as demolition, site preparation, grading, building construction, and paving activities. Each phase of construction has a specific equipment mix and associated noise characteristics, depending on the equipment used during that phase. Construction noise would typically be higher during the more equipment-intensive phases of initial construction (i.e., demolition, site preparation, and grading work) and would be lower during the later construction phases (i.e., building construction and paving). Table 3.10-6 illustrates typical noise levels associated with construction equipment at a distance of 25 feet.

	Estimated Noise Levels at Nearest Sensitive Receptors (dBA L _{eq})		
Equipment	25 feet	50 feet	100 feet
Air Compressor	86	80	74
Backhoe	86	80	74
Concrete Mixer	91	85	79
Dozer	91	85	79
Grader	91	85	79
Jack Hammer	94	88	82
Loader	86	80	74
Paver	91	85	79

Table 3.10-6 Typical Noise Levels for Construction Equipment

	Estimated Noise Levels at Nearest Sensitive Receptors (dBA L _{eq})			
Equipment	25 feet	50 feet	100 feet	
Pile-drive (Impact)	107	101	95	
Pile-driver (Sonic)	101	95	89	
Roller	91	85	79	
Saw	82	76	70	
Scarified	89	83	77	
Scraper	91	85	79	
Truck	90	84	78	

Source: Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment*. November. Available at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

Neither the Millbrae Municipal Code nor the 2040 General Plan contain quantitative limits for construction noise. In lieu of City-specific standards, the FTA criteria for assessing construction noise impacts are used. For residential, commercial, and industrial uses, the FTA daytime noise threshold is 80 dBA L_{eq}, 85 dBA L_{eq}, and 90 dBA L_{eq} for an 8-hour period, respectively.

Noise would typically drop off at a rate of about 6 dBA per doubling of distance. Therefore, noise levels would be about 6 dBA lower than shown in Table 3.10-6 at 50 feet from the noise source and 12 dBA lower at a distance of 100 feet from the noise source. As shown in these noise levels, construction noise may exceed the FTA's daytime noise limits, depending on the equipment used and the distance in which the equipment is operating compared to noise-sensitive receptors. However, implementation of Policy HSHM-10.7 contained in the 2040 General Plan would reduce construction noise and associated impacts. Policy HSHM-10.7 of the 2040 General Plan requires future discretionary projects to evaluate construction noise impacts.

Policy HSHM-10.7 Construction Noise. The City shall require new development to evaluate potential construction noise impacts on nearby sensitive uses as part of the CEQA analysis and to implement any required mitigation measures to minimize impacts on these uses.

Implementation of Policy HSHM-10.7 would ensure that construction noise from future discretionary projects is analyzed for potential impacts to noise-sensitive receptors, and that if required, mitigation measures would be implemented to minimize construction noise. Typical construction noise minimization techniques include temporary noise barriers, proper muffling and maintenance of construction equipment, locating stationary equipment and staging areas as far from noise-sensitive receptors as possible, notifying such receptors prior to construction activities, and assigning noise disturbance coordinators to respond to local complains about construction noise. Since at this stage of planning project-level details are not available for future projects that would be carried out under the 2040 General Plan and Specific Plan, it is not possible to determine exact noise levels, locations, or time periods for construction of such projects, or construction noise at adjacent properties. Therefore, even after implementation of mitigation measures through Policy HSHM-10.7, construction noise levels associated with future projects may exceed the FTA's daytime construction noise limits, and impacts would be potentially significant.

Implementation of Mitigation Measure NOI-1 would reduce 2040 General Plan and Specific Plan construction impacts associated with future discretionary projects in Millbrae. However, as exact details of future project-specific construction activities are unknown at this stage of planning, construction noise could still exceed FTA construction noise limits. Therefore, 2040 General Plan and Specific Plan construction noise impacts would be significant and unavoidable.

Operation

STATIONARY (ON-SITE OPERATIONAL) NOISE

2040 General Plan and Specific Plan

Stationary on-site operational noise sources at new commercial, industrial, residential, and mixeduse development would include mechanical equipment such as ground-level and rooftop ventilation and heating (HVAC) systems. New development facilitated by the proposed plans in commercial and industrial areas could introduce noise associated with loading activity and industrial equipment. Existing noise-sensitive receptors could be affected by the buildout of focus areas and associated operational noise occurring on-site at properties developed or redeveloped under the 2040 General Plan and Specific Plan.

An example of stationary noise would be from an HVAC unit such as the Carrier 38HDR060 split system condenser, which generates a noise level of 57 dBA at 7 feet, assuming no shielding.¹⁴ Therefore, noise levels from this HVAC unit with these assumptions would exceed the daytime noise threshold of 55 dBA L_{eq} as well as the nighttime noise threshold of 45 dBA L_{eq} within 28 feet. Other, larger HVAC units may be used on commercial, industrial, and mixed-use development as well that would exceed the operational noise limits. However, implementation of Policy HSHM-10.6 contained in the 2040 General Plan would reduce operational noise from proposed plans' stationary sources. Policy HSHM-10.6 of the 2040 General Plan requires commercial, industrial, and mixed-use developments to implement operational noise mitigation measures to minimize noise levels.

Policy HSHM-10.6 Operational Noise. The City shall require commercial, industrial, and mixed-use developments to implement operational noise mitigation measures to reduce potential impacts to adjacent sensitive land uses when operational noise exceeds thresholds.

Implementation of Policy HSHM-10.6 would ensure that operational noise mitigation measures are implemented for stationary sources from commercial, industrial, and mixed-use developments when operational noise exceeds thresholds. However, at this time, the 2040 General Plan and Millbrae Municipal Code do not contain an operation noise threshold to analyze future projects against. The previous General Plan does contain a threshold, which is used above for this stationary on-site operational noise impact analysis, but without a new policy for an operational noise threshold, impacts would be potentially significant.

Implementation of Mitigation Measures NOI-2 and NOI-3 would reduce potential stationary noise impacts associated with discretionary projects in Millbrae facilitated under the 2040 General Plan and Specific Plan. However, as exact details of future project-specific stationary noise activities are unknown at this stage of planning, stationary noise could still exceed operational noise limits.

¹⁴ Carrier. 2009. 38HDR Performance Series Air Conditioner with Puron Refrigerant, 1.5 to 5 Nominal Tons. Product Data.

Therefore, 2040 General Plan and Specific Plan impacts related to stationary on-site operational noise would be significant and unavoidable.

MOBILE (OFF-SITE OPERATIONAL) NOISE

2040 General Plan

Implementation of the 2040 General Plan would allow for higher density/intensity land uses than currently permitted and would be focused within the Specific Plan area, leading to additional vehicle trips on area roadways. The 2040 General Plan and Specific Plan would allow a net increase of approximately 1,880 residential units and facilitate the addition of 5,151 net new residents in Millbrae within the Downtown and El Camino Real corridor. A total of 636,000 square feet of new non-residential space could be constructed. By generating new vehicle trips, new development would incrementally increase the exposure of land uses along roadways to traffic noise. Implementation of the 2040 General Plan does not include policies or actions that would increase the frequency of rail services.

Within Millbrae, buildout of the 2040 General Plan would result in 1,257,516 VMT compared to 841,623 VMT under the existing condition, for an increase of 415,893 VMT (refer to Section 3.12, *Transportation*). Therefore, implementation of the 2040 General Plan would result in an approximate 49 percent increase on area roadways as a whole. It should be noted that (since land use changes and development facilitated by 2040 General Plan would be located in the Specific Plan area) 2040 General Plan noise impacts would be related to development in the Specific Plan area, and there would be no impact in this regard outside of the Specific Plan area. A 49 percent increase in trips equates to a noise increase of less than 2 dBA. As discussed in Section 3.10.1, a 3-dBA increase is considered barely perceptible. Therefore, a less than 2 dBA increase in noise would generally not be perceptible. Although the increase could be more than 49 percent on some streets, depending on the specific uses and locations of development that would be allowed under the 2040 General Plan, a doubling of traffic volumes would be required to reach the threshold of noticeability (a 3-dba increase in noise levels). A doubling of traffic volumes (i.e., a 100 percent increase) is not anticipated under the 2040 General Plan.

The 2040 General Plan provides the following policy to reduce roadway transportation noise:

Policy HSHM10.12 Transportation Project Noise. When evaluating proposals for transportation projects, the City shall require the project applicant to minimize noise impacts through the implementation of mitigation measures, so the resulting noise levels do not exceed the City's "normally acceptable" noise standard. The City shall encourage design strategies and alternative noise reduction methods in lieu of sound walls along transportation corridors to enhance aesthetics while still mitigating noise impacts.

In addition, the following 2040 General Plan goals, policies, and implementation programs would encourage active transportation modes, such as walking and bicycling, and would encourage the use of public transit, thereby reducing traffic noise in Millbrae.

Goal LU-2 Support a variety of housing opportunities and improve access to housing for all community members.

Policy LU-2.3 Housing Near Jobs. The City shall support opportunities that enable people to live close to job locations.

Goal LU-3 Preserve and enhance the identity and qualities of Millbrae's distinct residential neighborhoods to ensure Millbrae remains a desirable place to live.

- Policy LU-3.7 Walkable Neighborhoods. The City shall promote the pedestrian-scaled environment and walkable neighborhoods by supporting and providing alternative modes of transportation, enhancing bike and pedestrian connectivity to local commercial districts and the Millbrae Station, and maintaining or requiring owner maintenance of public sidewalks, public plazas, parks, greenways, parkways, street tree canopies, and landscaping throughout residential neighborhoods.
- Policy LU-7.4High Density, Mixed-Use Development. The City shall encourage high
density, mixed-use development in the Station Area with restaurants,
retail, entertainment, offices, and residential to promote the creation of a
compact, walkable, transit-oriented district.
- Goal M-1 Design, build, maintain, and operate streets to be safe and accessible for all users, regardless of their age, ability, or whether they are walking, bicycling, taking transit, or driving.
 - Policy M-1.1 Serving All Users. The City shall develop, or require new development to incorporate into proposed projects, complete streets infrastructure, where applicable, sufficient to provide safe, comfortable, and convenient travel along and across streets to serve all types of travel (including pedestrians, bicyclists, motorists, movers of commercial goods, micromobility, and public transportation), and users (including persons with disabilities, seniors, children, and families).
 - Policy M-1.2 Multimodal Choices. The City shall promote development of an integrated, multimodal transportation system that offers desirable choices among travel modes including micromobility, pedestrian ways, bikeways, public transportation, and roadways.
 - Policy M-1.4 Accessibility and Connectivity. The City shall create a more comprehensive multimodal transportation system by identifying and eliminating gaps in roadways, bikeways, and pedestrian networks; increasing transit access in underserved areas; and removing natural and man-made barriers to accessibility and connectivity.

Goal M-2 Provide an efficient, convenient, and accessible public transit system for residents, workers, and visitors in Millbrae.

Policy M-2.1Caltrain and BART. The City shall coordinate with Caltrain and BART to
assure the Millbrae Station is well-maintained, has adequate parking, a
safe environment, and continues to provide high-quality service.

- Policy M-2.2 California High Speed Rail. The City shall continue to work with and strongly advocate that the California High-Speed Rail Authority plan a highquality, well-designed Millbrae-SFO Station that enhances access and services and fully integrates all transit modes serving the Station into a single station and is also coordinated and interconnected with the surrounding environment including development projects. The City will continue to request that a variety of alternatives are considered, including alternatives that provide the least impact on the community.
- Policy M-2.3 Bus and Shuttle Service. The City shall work with SamTrans, other agencies, private companies, and organizations to provide and manage appropriate community-serving transit service and coordination of schedules and services with other transit agencies. Shuttle service should focus on connecting transit, hotels, and employment centers with the City's Downtown.
- Goal M-3 Provide a robust and interconnected bicycle and pedestrian circulation system throughout the city that promotes healthy lifestyles and is a viable alternative to automobile use.
 - Policy M-3.1Active Transportation Plan. The City shall maintain and implement the
Active Transportation Plan to enhance the city's bicycle and pedestrian
network.
 - Policy M-3.2Trail Access. The City shall enhance the system of pathways providing
access to the Spur Trail, the Bay Trail, the Bay Area Ridge Trail, the Crystal
Springs Regional Trail, and closing gaps in the trail system.
 - Policy M-3.3Bay Trail. The City shall support the completion of the Bay Trail in
coordination with regional agencies, and the selection of the trail route and
implementation of the trail system in an appropriate alignment between
Millbrae and South San Francisco.
 - Policy M-3.4Bikeways System. The City shall develop and maintain a safe and logical
bikeways system that is coordinated with the countywide system
(consistent with the San Mateo County Bicycle and Pedestrian Plan) and
the neighboring cities of San Bruno and Burlingame.
 - Policy M-3.5 Bicycle Lanes on El Camino Real. The City shall explore options for providing separated or buffered bicycle lanes along El Camino Real and developing parallel alternative routes to the El Camino Real route to provide for connectivity for bicyclists of all ages and abilities, consistent with the Active Transportation Plan and Downtown and El Camino Real Specific Plan.
 - Policy M-3.7 Bicycle and Pedestrian Facilities. The City shall evaluate new commercial, multifamily residential, and mixed-use development projects to ensure that the project provides bicycle and pedestrian facilities approved by the Community Development Department, adjacent to the project site. Improvements could include secure bicycle parking, streetlights, street furniture, landscaping, trash receptacles, pedestrian-scaled lighting fixtures, shade, and public art.

- Policy M-3.11 Shared Electric Bikes and Scooters. The City shall designate locations for mobility hubs and modify existing city infrastructure to accommodate shared bicycles, electric bikes and scooters that provide last-mile solutions to residents and commuters. Infrastructure enhancements include dedicated off-street parking spaces and on-street corrals to accommodate shared electric bike and scooter parking and prevent conflicts with pedestrians.
- Policy M-4.10Bicycle Parking. The City shall require short- and long-term bicycle parking
for new development on all land uses, except for single-family dwellings.
- Goal M-5 Implement transportation demand management strategies and programs to reduce vehicle miles traveled, traffic congestion, and parking demand.
 - Policy M-5.1Countywide TDM Programs Participation. The City shall continue to
participate in countywide TDM programs to assist employers and
employees in reducing the use of single-occupancy vehicles and promoting
and incentivizing the use of transit, active transportation (i.e., non-
motorized transportation), and carpooling/vanpooling.
 - Policy M-5.2San Mateo County Congestion Management Program. The City, in
coordination with the City/County Association of Governments of San
Mateo County (C/CAG) as the designated Congestion Management Agency
for the County, shall implement the County Congestion Management
Program and the Land Use Impact Analysis Program, otherwise known as
the Transportation Demand Management (TDM Policy). The TDM Policy
establishes project review thresholds, vehicle trip reduction and mode
share targets, monitoring and reporting requirements, and TDM measures.
 - Policy M-5.3 Bay Area Commuter Benefits Program. The City shall continue to support the Bay Area Commuter Benefits Program, to improve air quality, reduce emissions of greenhouse gases and other air pollutants, and to decrease traffic congestion in the Bay Area by encouraging employees to commute by transit, carpooling, biking, and other alternative modes.
 - Policy M-5.4 Car Sharing. The City shall explore opportunities to partner with car sharing companies to establish designated car sharing spaces and vehicles in the City, and the City shall explore opportunities for car sharing companies to occupy any required parking spaces on private property provided the cars are made available to the general public.

Goal M-6 Develop balanced housing and employment opportunities to reduce vehicle miles traveled.

Policy M-6.1Agency Coordination. The City shall coordinate with San Francisco
International Airport, the High-Speed Rail Authority, Caltrans, the Peninsula
Corridor Joint Powers Board, Metropolitan Transportation Commission
(MTC), the San Francisco Bay Area Rapid Transit District, the San Mateo
County Transit District, the City/County Association of Governments of San
Mateo County and other transit providers and transportation agencies, to
meet the travel needs of Millbrae residents, workers, and visitors.

Goal HSHM-1 Improve the health of and quality of life for all Millbrae residents.

Policy HSHM-1.3 Physical Activity and the Built Environment. The City shall support new developments or infrastructure improvements in existing neighborhoods that enable people to drive less and walk, bike, or take public transit more.

Implementation of these policies would reduce vehicle trips and associated traffic noise to the extent feasible. Furthermore, traffic volumes on streets associated with implementation of the 2040 General Plan would not increase by 100 percent, and thus increases in traffic noise would not exceed the barely perceptible threshold. Therefore, 2040 General Plan mobile off-site operational traffic noise would be less than significant.

Specific Plan

The Specific Plan allows for higher density/intensity land uses than currently permitted and focused within the Specific Plan area, leading to additional vehicle trips on area roadways. By generating new vehicle trips, new development would incrementally increase the exposure of land uses along roadways to traffic noise. Implementation of the Specific Plan does not include policies or actions that would increase the frequency of rail services.

Within the Specific Plan area, buildout of the Specific Plan would result in 307,156 VMT compared to 215,636 VMT under the existing condition, for an increase of 91,520 VMT (refer to Section 3.12, *Transportation*). Therefore, implementation of the Specific Plan would result in an approximate 42 percent increase on area roadways as a whole. A 42 percent increase in trips equates to a noise increase of less than 2 dBA. As discussed in Section 3.10.1, a 3-dBA increase is considered barely perceptible. Therefore, a less than 2 dBA increase in noise would generally not be perceptible. Although the increase could be more than 42 percent on some streets, depending on the specific uses and locations of development that would be allowed under the Specific Plan, a doubling of traffic volumes would be required to reach the threshold of noticeability (a 3-dba increase in noise levels). A doubling of traffic volumes (i.e., a 100 percent increase) is not anticipated under the Specific Plan.

The 2040 General Plan includes Policy HSHM-10.12 (Transportation Project Noise) and listed with further detail above to reduce roadway transportation noise. In addition, 2040 General Plan goals, policies, and implementation programs that would encourage active transportation modes (e.g., walking, bicycling) and encourage the use of public transit, thereby reducing traffic-related noise associated with the Specific Plan, include Policies LU-2.3 (Housing Near Jobs), LU-3.7 (Walkable Neighborhoods), LU-7.4 (High Density, Mixed-Use Development), M-1.1 (Serving All Users), M-1.2 (Multimodal Choices), M-1.4 (Accessibility and Connectivity), M-2.1 (Caltrain and BART), M-2.2 (California High Speed Rail), M-2.3 (Bus and Shuttler Service), M-3.1 (Active Transportation Plan), M-3.2 (Bikeway Systems), M-3.3 (Trail Access), M-3.4 (Bay Trail), M-3.5 (Bicycle Lanes on El Camino Real), M-3.7 (Bicycle and Pedestrian Facilities), M-3.11 (Bicycle Parking), M-3.12 (Shared Electric Bikes and Scooters), M-5.1 (Countywide TDM Programs Participation), M-5.2 (San Mateo County Congestion Management Program), M-5.3 (Bay Area Commuter Benefits Program), M-5.4 (Car Sharing), M-6.1 (Agency Coordination), and HSHM-1.3 (Physical Activity and Built Environment) as listed in further detail above. Implementation of these policies would reduce vehicle trips and associated mobile off-site operational traffic noise to the extent feasible. Furthermore, traffic volumes on streets associated with implementation of the Specific Plan would not increase by 100 percent, and thus increases in traffic noise would not exceed the barely perceptible threshold. Therefore, Specific Plan mobile off-site operational traffic noise would be less than significant.

Overall, operational impacts related to noise (encompassing both stationary and mobile noise) would be significant and unavoidable.

Overall

Overall, 2040 General Plan and Specific Plan impacts related to noise would be significant and unavoidable.

Mitigation Measures

MITIGATION MEASURE NOI-1 CONDUCT CONSTRUCTION NOISE ANALYSIS

The City shall require future projects that are subject to discretionary approval and that are not found to be exempt from CEQA review to evaluate potential construction noise impacts on nearby sensitive uses as part of project-level CEQA analysis and implement respective mitigation measures to minimize impacts on these uses. Examples of mitigation measures to reduce construction noise include, but are not limited to:

- Equipment Staging Areas. Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receptors.
- Electrically-Powered Tools and Facilities. Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities.
- Smart Back-up Alarms. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.
- Noise Disturbance Coordinator. The project applicant shall designate a "noise disturbance coordinator" responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of any noise complaint (e.g., starting too early, bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator shall be posted at the construction site
- Additional Noise Attenuation Techniques. During the clearing, earth moving, grading, and foundation/conditioning phases of construction, temporary sound barriers shall be installed and maintained between the construction site and the noise-sensitive receptors. Temporary sound barriers shall consist of sound blankets affixed to construction fencing or temporary solid walls along all sides of the construction site boundary facing potentially noise-sensitive receptors.

MITIGATION MEASURE NOI-2 PREPARE AND IMPLEMENT STATIONARY OPERATIONAL NOISE THRESHOLD

The City shall include and implement a new 2040 General Plan policy under the Health, Safety, and Hazardous Materials Element to prepare, adopt, and implement operational stationary noise thresholds. The City shall adopt the stationary noise thresholds by Spring 2023 for use in future CEQA GHG emissions analyses through 2040. Specifically, the stationary noise thresholds for noise-sensitive land uses shall include the limits shown in Table 3.10-8.

Noise Metric	Daytime (7 a.m. to 10 p.m.)	Nighttime (10 p.m. to 7 a.m.) ²
dBA L _{eq} (1-hour)	55	45
dBA L _{max}	70	65
dBA L _{max} , impulsive	65	60

Table 3.10-7 Millbrae Stationary Noise Source Limits

Notes:

¹ As determined at the property line of the receiving land use; allowable levels shall be raised to the ambient noise levels where the ambient levels exceed the allowable levels. When determining the effectiveness of noise mitigation measures, the standards may be applied on the receptor side of noise barriers or other property line noise mitigation measures.

² Applies only where the receiving land use operates or is occupied during nighttime hours.

MITIGATION MEASURE NOI-3 CONDUCT STATIONARY OPERATIONAL NOISE ANALYSIS

The City shall require future development projects that are subject to discretionary approval to evaluate potential stationary operational noise impacts as part of project-level CEQA analysis on nearby noise-sensitive uses and to implement any required mitigation measures to minimize impacts on these uses. Examples of mitigation measures to reduce stationary noise include, but are not limited to, operational restrictions, selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.

Level of Significance

Significant and unavoidable

Noise Land Use Compatibility Consistency and Effects of Airport Activity Noise

Significance Criterion b:	Would the proposed plans cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?
Significance Criterion d:	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the proposed plans expose people residing or working in the project area to excessive noise levels?

Impact NOI-2 IMPLEMENTATION OF THE 2040 GENERAL PLAN AND SPECIFIC PLAN NEAR MAJOR TRANSPORTATION-NOISE SOURCES (MAJOR ROADWAYS, RAIL, AND AIRPORT) MAY EXPERIENCE NOISE LEVELS THAT EXCEED THE MILLBRAE GENERAL PLAN NOISE LAND USE COMPATIBILITY STANDARDS. PROPOSED 2040 GENERAL PLAN POLICIES REQUIRE ANALYSIS OF FUTURE PROJECTS THAT MAY EXCEED SUCH CONTOURS FOR EXTERIOR AND INTERIOR NOISE COMPLIANCE. IMPACTS WOULD BE LESS THAN SIGNIFICANT FOR ROADWAY AND RAIL NOISE SOURCES. HOWEVER, NO FEASIBLE MITIGATION EXISTS TO REDUCE AIRCRAFT NOISE THAT IS GENERATED AT AN ELEVATED POSITION TO AN EXTERIOR AREA. THIS WOULD BE A SIGNIFICANT AND UNAVOIDABLE IMPACT.

Construction

Impacts related to noise land use compatibility consistency are limited to permanent land uses and, thus, operational impacts. In addition, noise impacts related to location proximate to a private airstrip or public use airport are limited to operational impacts. No respective construction impacts would occur.

Operation

ROADWAY AND RAIL NOISE

2040 General Plan

Development facilitated by the 2040 General Plan could result in noise levels at noise-sensitive land uses that exceed Millbrae noise standards and, thus, result in a conflict with the Millbrae land use compatibility standards. It should be noted that (since land use changes and development facilitated by 2040 General Plan would be located in the Specific Plan area) 2040 General Plan noise impacts would be related to development in the Specific Plan area, and there would be no impact in this regard outside of the Specific Plan area. The 2040 General Plan includes policies to regulate noise exposure for new land uses in Millbrae, as shown below in Policies HSHM-10.1 through HSHM-10.5 and HSHM-10.13:

Policy HSHM-10.1	Noise Sensitive Uses. The City shall discourage noise sensitive uses, (e.g., residences, schools, hospitals, libraries, religious institutions, and convalescent homes) from locating near major sources of noise.
Policy HSHM-10.2	Noise Standards. The City shall require new development to comply with the Exterior Noise Compatibility Standards for Various Land Uses (Table HSQL-1) and the Future Noise Contours Map (Figure 10-1).
Policy HSHM-10.3	Noise Source Control. The City shall continue to work with property owners to control noise at its source by maintaining community noise levels and ensuring that noise levels do not exceed applicable standards.
Policy HSHM-10.4	Noise Studies. The City shall require a project-level noise study for new development proposed near major noise sources (e.g., major roadways, rail lines, aircraft overflight zones, or other major non-transportation noise sources).
Policy HSHM-10.5	Interior Noise Review for Multiple, Loud Short-Term Events. For new development in areas that would be subject to frequent, high-noise events (such as aircraft take offs and landings, train or truck traffic), the City shall assess potential noise impacts on sensitive receptors and consider these impacts when reviewing development proposals for approval.
Policy HSHM-10.13	Transportation Agency Coordination. The City shall work with the City/County Association of Governments of San Mateo County, CalTrans, SFO, BART, Caltrain, California High Speed Rail Authority, and other agencies to mitigate transportation-related noise impacts on sensitive land uses and adjacent properties and neighborhoods.

Specifically, a significant impact would occur if development under the 2040 General Plan would result in a conflict with the City's adopted land use compatibility standards under Table 3.10-5,

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which is analyzed with the noise contours under Figure 3.10-1. When noise levels exceed 60 CNEL, they have the potential to exceed the normally acceptable noise level for residential uses such as single-family residences, duplexes, mobile homes; when noise levels exceed 65 CNEL, they have the potential to exceed the normally acceptable noise level for residential uses such as townhomes, multi-family apartments, condominiums and for lodging such as motels and hotels; and when noise levels exceed 70 CNEL, they have the potential to exceed the normally acceptable noise level for residential uses such as urban residential infill and mixed-use projects, schools, libraries, churches, hospitals, nursing homes, and playgrounds and neighborhood parks.

As shown in Figure 3.10-1, noise levels from the major transportation sources in the City exceed 60 CNEL at sensitive land uses near Interstate 280, Highway 82, Highway 101; this mostly occurs next to Interstate 280, Highway 101, and the rail line. Noise levels exceed 65 CNEL at sensitive land uses near Interstate 280, Highway 82, Highway 101; this mostly occurs next to Interstate 280, Highway 82, Highway 101; this mostly occurs next to Interstate 280, Highway 82, Highway 101; this mostly occurs next to Interstate 280, Highway 101, and the rail line. Noise levels generally only exceed 70 CNEL at sensitive land uses directly near Interstate 280 and Highway 101.

The policies stated above would reduce or eliminate the potential for noise-sensitive receptors to be exposed to these noise levels. For example, Policy HSHM-10.4 would require studies for land uses located near the major transportation noise sources, and Policy HSHM-10.5 would ensure review to analyze interior noise limits. With implementation of these studies and subsequent noise control, noise levels from major transportation noise levels such as rail and traffic would be less than significant. Aircraft noise has unique properties that are discussed further below. Overall, 2040 General Plan operational impacts related to noise land use compatibility consistency from roadway and rail noise sources would be less than significant.

Specific Plan

The Specific Plan does not include policies to regulate noise exposure for new development in the City; however, the policies described above for the 2040 General Plan would also apply to Specific Plan development.

A significant impact would occur if Specific Plan development would result in a conflict with the City's adopted land use compatibility standards under Table 3.10-5, which is analyzed with the noise contours under Figure 3.10-1. When noise levels exceed 60 CNEL, they have the potential to exceed the normally acceptable noise level for residential uses such as single-family residences, duplexes, mobile homes; when noise levels exceed 65 CNEL, they have the potential to exceed the normally acceptable noise level for residential uses such as townhomes, multi-family apartments, condominiums and for lodging such as motels and hotels; and when noise levels exceed 70 CNEL, they have the potential to exceed the normally acceptable noise level for residential uses such as a urban residential infill and mixed-use projects, schools, libraries, churches, hospitals, nursing homes, and playgrounds and neighborhood parks.

The Specific Plan area is located in an area of exposure to all major transportation sources: traffic along Highway 82 and Highway 101; airport noise (discussed below); and rail noise. As shown in Figure 3.10-1, noise levels from the major transportation sources in the Specific Plan area exceed 60 CNEL at sensitive land uses near Highway 82, Highway 101; this mostly occurs next to Highway 82, Highway 101, and the rail line. Noise levels exceed 65 CNEL at sensitive land uses near Highway 82, Highway 101; this mostly occurs next to Interstate 280, Highway 101, and the rail line. Noise levels generally only exceed 70 CNEL at sensitive land uses directly near Highway 101.

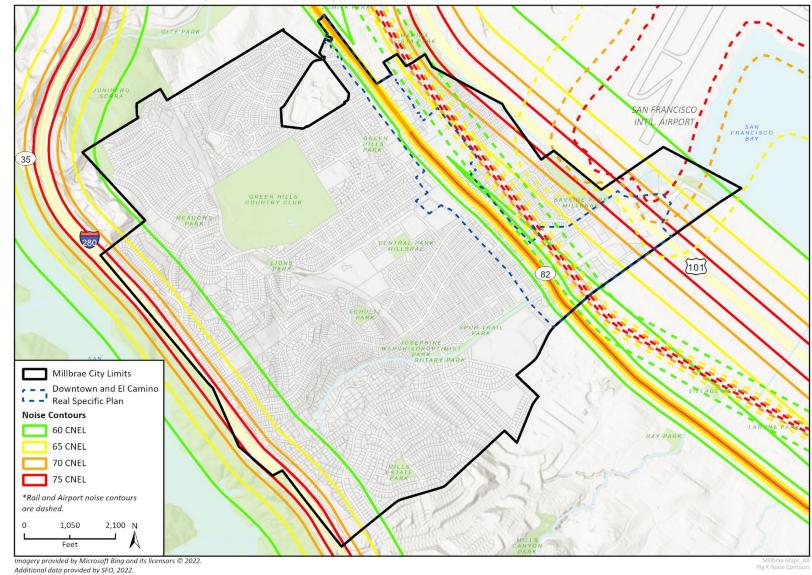


Figure 3.10-1 Noise Contours Map Over Millbrae City Limits

The policies stated above would reduce or eliminate the potential for noise-sensitive receptors associated with Specific Plan development to be exposed to these noise levels. For example, Policy HSHM-10.4 would require studies for land uses located near the major transportation noise sources, and Policy HSHM-10.5 would ensure review to analyze interior noise limits. With implementation of these studies and subsequent noise control, noise levels from major transportation noise levels such as rail and traffic would be less than significant. Aircraft noise has unique properties that are discussed further below. Overall, Specific Plan operational impacts related to noise land use compatibility consistency from roadway and rail noise sources would be less than significant.

AVIATION NOISE

2040 General Plan

A significant impact would occur if a plan or project would expose people residing or working in the project area to excessive noise levels for a plan or project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport. It should be noted that (since noise-sensitive land use [i.e., residential] changes and development facilitated by 2040 General Plan would be located in the Specific Plan area) 2040 General Plan noise impacts would be related to development in the Specific Plan area.

SFO is located adjacent to the east of Millbrae, with the southwest to northeast runway flight paths occurring over Millbrae. This runway is not used to the extent of the main runway whose flight path runs perpendicular to Millbrae. The airport noise contours are shown in Figure 3.10-1. As shown in the figure, these noise contours extend into the eastern part of Millbrae, particularly exposing the residents of the neighborhood surrounding Bayside Manor Park and users of the hotels off Old Bayshore Highway. Noise-sensitive receptors further west into Millbrae may be exposed to elevated noise levels from the airport, however they would not be exposed to airport noise levels 65 CNEL or above. SFO does not provide noise contours for 60 CNEL to 65 CNEL, but it is assumed that the 60 CNEL contour would extend further into the city, covering more areas that contain noise-sensitive receptors. As the City of Millbrae's normally acceptable noise levels are 50 to 60 CNEL for residential, hotels, motels, schools, libraries, museums, hospitals, personal care, meeting halls, churches, office buildings, business commercial, and professional land uses, this would mean that noise-sensitive receptors in Millbrae would be exposed to conditionally acceptable noise levels from SFO. However, implementation of the following policies proposed in the 2040 General Plan would reduce the exposure of sensitive receptors to SFO noise:

- Policy HSHM-6.4 Airport Land Use Compatibility Plan Land Use and Development Consistency. The City shall ensure that all future land use actions and/or associated development conforms to the relevant height, aircraft noise, and safety policies and compatibility criteria contained in the most recently adopted version of the Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.
- **Policy HSHM-6.7** Airport Noise Mitigation. The City shall continue to work with the relevant agencies, including the Airport Land Use Commission and the SFO Community Roundtable, to ensure ongoing reduction of airport noise, including low-frequency ground-borne noise.

Policy HSHM-6.8	SFO Residential Sound Insulation Program. The City shall support the
	continuation of the Residential Sound Insulation Program to reduce the
	noise impacts for dwellings impacted by aircraft noise 65 dBA or greater.
	The City shall encourage SFO to fill any gaps that might occur in Federal
	funding until all eligible homes have been insulated.

- **Policy HSHM-6.9 Low-Frequency Ground-borne Aircraft Noise Mitigation.** The City shall require new development to include development and site planning mitigation measures to reduce low-frequency ground-borne noise from inbound and outbound aircraft at SFO.
- Policy HSHM-10.8 Protection from SFO Noise. The City shall discourage outdoor activities or uses in areas within the 70 dBA CNEL contour line of the San Francisco International Airport (as mapped in the Airport Land Use Compatibility Plan) where people could be exposed to hazardous noise levels.
- **Policy HSHM-10.9** Airport Disclosure Notices. The City shall require that all new development comply with real estate disclosure requirements of State law. Section 11010 of the Business and Professions Code requires people offering subdivided property for sale or lease to disclose the presence of all existing and planned airports within two miles of the property (Cal. Bus. and Prof. Code Section 110010(b)(13).
- Policy HSHM-10.10 Partnering with SFO on Noise Minimization. The City shall continue to partner with SFO to collaborate on potential mitigation to minimize airport noise within the community, including improvements on the land owned by SFO, to serve as a noise buffer through enhanced landscaping and trees.

As new development of noise-sensitive receptors would occur within parts of Millbrae not within the 65 CNEL or greater airport noise contours, typical architectural materials and insulation efforts as part of policies such as HSHM-6.8 would typically reduce exterior-to-interior noise levels by at least 20 CNEL. Therefore, future interior noise levels of 2040 General Plan development would be expected to not exceed 45 CNEL, and impacts related to interior noise levels would be less than significant.

Implementation of proposed 2040 General Plan Policy HSHM-6.4 would ensure that future projects including noise-sensitive receptors are developed in accordance with aircraft noise policies in the Airport Land Use Compatibility Plan for the Environs of SFO. Policy HSHM-6.7 would allow the City to continue working with the ALUC and SFO Community Roundtable to ensure ongoing reduction of airport noise. For residences that experience aircraft noise 65 dBA or greater, Policy HSHM-6.8 would have the City support SFO efforts to complete the Residential Sound Insulation Plan. Policy HSHM-6.9 would be focused on new development being designed to minimize noise from SFO. Implementation of Policy HSHM-10.8 would discourage exposure of noise-sensitive receptors to the 70 CNEL noise contours which only occurs in a small portion of the easternmost part of the City. Policy HSHM-10.9 would be implemented to require that all new development properly disclose the exposure of those residents to aircraft noise. Finally, Policy HSHM-10.10 would have the City coordinate with SFO on airport noise mitigation (similar to Policy HSHM-6.7 and Policy HSHM-6.8). Implementation of these policies would ensure that exterior noise levels from aircraft noise are compatible with City standards to the extent possible; however, due to the exposure of sensitive receptors to high noise levels from an elevated position from aircraft noise, it may not be possible to reduce exterior noise levels from a conditionally compatible noise level to a normally acceptable

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noise level of 60 CNEL or below. Therefore, exterior noise levels from the airport and related aviation activities are potentially significant. Due to aircraft noise coming from an elevated position to the exterior areas of potential future land uses with noise-sensitive receptors, no feasible mitigation measures exist to reduce exterior noise levels associated with aircraft noise to 60 CNEL or below at future 2040 General Plan or Specific Plan development. The 2040 General Plan operational impact related to consistency with land use compatibility standards would be significant and unavoidable.

Specific Plan

SFO is located adjacent to the east of Millbrae; the Specific Plan area is located approximately 1,800 feet west of the SFO airport. The airport noise contours are shown in Figure 3.10-1; these contours do not extend into the Specific Plan area. SFO does not provide noise contours for 60 CNEL to 65 CNEL, but it is assumed that the 60 CNEL contour would extend further into Millbrae, including the Specific Plan area. As Millbrae's normally acceptable noise levels are 50 to 60 CNEL for residential, hotels, motels, schools, libraries, museums, hospitals, personal care, meeting halls, churches, office buildings, business commercial, and professional land uses, this would mean that noise-sensitive receptors in the Specific Plan area would be exposed to conditionally acceptable noise levels from SFO. The proposed Specific Plan contains the following policy related to aircraft noise and is the same as 2040 General Plan Policy HSHM-6.4:

Policy LU-15Airport Land Use Compatibility Plan and Land Use Development
Consistency. The City shall ensure that all future land use actions and/or
associated development conforms to the relevant height, aircraft noise,
and safety policies and compatibility criteria contained in the most recently
adopted version of the Airport Land Use Compatibility Plan for the Environs
of San Francisco International Airport.

In addition, 2040 General Plan policies that would address noise land use compatibility within the Specific Plan area include Policies HSMH-6.4 (Airport Land Use Compatibility Plan Land Use and Development, HSMH-6.7 (Airport Noise Mitigation), HSMH-6.8 (SFO Residential Sound Insulation Program), HSMH-6.9 (Low-Frequency Ground-borne Aircraft Noise Mitigation), HSMH-10.8 (Protection from SFO Noise), HSMH-10.9 (Airport Disclosure Notices), and HSMH-10.10 (Partnering with SFO on Noise Mitigation) listed in further detail above.

Implementation of Policy LU-15/Policy HSHM-6.4 would ensure that development facilitated by the Specific Plan, including future noise-sensitive receptors, is consistent with aircraft noise policies in the Airport Land Use Compatibility Plan. Policy HSHM-6.7 would allow the City to continue working with the ALUC and SFO Community Roundtable to ensure ongoing reduction of airport noise. For Specific Plan residences that experience aircraft noise 65 dBA or great, Policy HSHM-6.8 would have the City support SFO efforts to complete the Residential Sound Insulation Plan. Policy HSHM-6.9 would be focused on new Specific Plan development being designed to minimize noise from SFO. Implementation of Policy HSHM-10.8 would discourage exposure of sensitive receptors to the 70 CNEL noise contours which only occurs in a small portion of the easternmost part of the City. Policy HSHM-10.9 would be implemented to require that all new Specific Plan development properly disclose the exposure of those residents to aircraft noise. Finally, Policy HSHM-10.10 would have the City coordinate with SFO on airport noise mitigation (similar to Policy HSHM-6.7 and Policy HSHM-6.8).

As new development of noise-sensitive receptors would occur within parts of the Specific Plan not within the 65 CNEL or greater airport noise contours, typical architectural materials and insulation efforts as part of policies such as HSHM-6.8 would typically reduce exterior-to-interior noise levels by at least 20 CNEL. Therefore, future interior noise levels of 2040 General Plan development would be expected to not exceed 45 CNEL, and impacts to interior noise levels would be less than significant.

Implementation of the aforementioned 2040 General Plan policies would ensure that exterior noise levels at Specific Plan development from aircraft noise are compatible with City standards to the extent possible; however, due to the exposure of sensitive receptors to high noise levels from an elevated position from aircraft noise, it may not be possible to reduce exterior noise levels from a conditionally compatible noise level to a normally acceptable noise level of 60 CNEL or below. Therefore, exterior noise levels at Specific Plan development from the airport and aviation-related activities are potentially significant. Due to aircraft noise coming from an elevated position to the exterior areas of potential future land uses with noise-sensitive receptors, no feasible mitigation measures exist to reduce exterior noise levels associated with aircraft noise to 60 CNEL or below at future 2040 General Plan or Specific Plan development. Therefore, the 2040 General Plan operational impact related to consistency with land use compatibility standards is significant and unavoidable.

Overall

Overall, 2040 General Plan and Specific Plan impacts related to noise land use compatibility standards consistency and effects of airport activity noise would be significant and unavoidable.

Mitigation Measures

No feasible mitigation is available for aviation noise.

Level of Significance

Significant and unavoidable

Effects of Groundborne Vibration and Noise

Significance Criterion c: Would the proposed plans result in generation of excessive groundborne vibration or groundborne noise levels?

Impact NOI-3 CONSTRUCTION OF PROJECTS FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD TEMPORARILY GENERATE GROUNDBORNE VIBRATION. IF THESE PROJECTS CONDUCT PILE DRIVING, THEY COULD POTENTIALLY EXCEED CALTRANS VIBRATION THRESHOLDS. MITIGATION WOULD MINIMIZE PILE DRIVING VIBRATION IMPACTS. HOWEVER, CONSTRUCTION VIBRATION FROM PILE-DRIVERS MAY STILL DISTURB PEOPLE OR DAMAGE BUILDINGS BEYOND CALTRANS THRESHOLDS. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE EVEN WITH MITIGATION.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

Construction of future projects facilitated by the proposed 2040 General Plan and Specific Plan could intermittently generate groundborne vibration to nearby properties. Table 3.10-8 lists

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

groundborne vibration levels from various types of construction equipment at various distances. Due to typical setbacks from equipment size and off-site structures, it is assumed that 25 feet is the closest distance that the center of construction vibration is generated to sensitive receptors. Although groundborne vibration is sometimes noticeable in outdoor environments, groundborne vibration is almost never annoying to people who are outdoors; the vibration level threshold for human perception is assessed at occupied structures.¹⁵ Therefore, vibration impacts are assessed at the structure of an affected property.

		••			
			Approximate Vibration Level (in/sec PPV)		
Equipment		25 feet from Source	50 feet from Source	100 feet from Source	200 feet from Source
Caisson Drilling		0.089	0.042	0.019	0.009
Jackhammer		0.035	0.016	0.008	0.004
Large Bulldozer		0.089	0.042	0.019	0.009
Loaded Truck		0.076	0.036	0.017	0.008
Pile Driver (impact)	Upper range	1.519	0.709	0.331	0.154
	Typical	0.644	0.300	0.140	0.065
Pile Driver (sonic)	Upper range	0.734	0.342	0.160	0.075
	Typical	0.170	0.079	0.037	0.017
Small Bulldozer		0.003	0.001	0.0007	0.0003
Vibratory Roller		0.21	0.098	0.046	0.021

Table 3.10-8 Vibration Source Levels for Construction Equipment

As shown in Table 3.10-8, sensitive receptors and buildings could experience the strongest vibration during the use of pile-drivers and vibratory rollers. Vibration levels from pile-drivers could approach 1.519 in/sec PPV at a distance of 25 feet from the source and 0.331 in/sec at 100 feet, and vibration levels from vibratory rollers could approach 0.21 in/sec PPV at a distance of 25 feet and 0.046 at 100 feet.

Vibration levels from typical equipment such as bulldozers and vibratory rollers would not exceed Caltrans standards. However, vibration levels from pile driving equipment may exceed Caltrans standards. Implementation of Policy HSHM-10.14 contained in the 2040 General Plan would reduce construction vibration and associated impacts from pile driving activities. 2040 General Plan Policy HSHM-10.14 requires projects that involve pile driving to prepare a Vibration Impact Assessment.

Policy HSHM-10.14 Vibration Impact Assessment for Construction Projects. The City shall require that all new development using piling driving construction applications provide a Vibration Impact Assessment prior to commencing construction on the project. The Vibration Impact Assessment shall provide the timeline, anticipated impacts, and mitigation to minimize the effects of vibration caused by onsite construction.

¹⁵ Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment*. November. Available at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

Implementation of Policy HSHM-10.14 would ensure that construction vibration from pile driving construction activities is analyzed for potential impacts to buildings and to noise-sensitive receptors, and that, if required, mitigation measures would be implemented to minimize vibration. Typical vibration minimization techniques include schedule construction activities with the highest potential to produce vibration to hours with the least potential to affect nearby institutional, educational, and office uses and to notify neighbors of scheduled construction activities that would generate vibration. Since at this stage of planning project-level details are not available for individual development projects that would be carried out under the 2040 General Plan and Specific Plan, it is not possible to determine which projects may use pile driving and its exact vibration levels, locations, or time periods for construction of such projects. Therefore, even after implementation of mitigation measures through 2040 General Plan Policy HSHM-10.14, construction noise levels may exceed the FTA's daytime construction noise limits, and impacts would be potentially significant.

Mitigation Measure NOI-4 would reduce potential vibration impacts from pile driving activities in Millbrae associated with implementation of the 2040 General Plan and Specific Plan. However, as exact details of future project-specific construction activities are unknown at this stage of planning, vibration could still exceed Caltrans vibration limits for building damage and human annoyance. Therefore, 2040 General Plan and Specific Plan construction vibration impacts would be significant and unavoidable.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Residential, commercial, and retail land uses facilitated by the 2040 General Plan and Specific Plan would not involve substantial vibration sources associated with operation. Therefore, 2040 General Plan and Specific Plan operational vibration impacts would be less than significant.

Overall

Overall, 2040 General Plan and Specific Plan impacts related to vibration would be significant and unavoidable.

Mitigation Measures

MITIGATION MEASURE NOI-4 CONDUCT VIBRATION IMPACT ASSESSMENT FOR PILE DRIVING

The City shall require future projects that would perform pile driving construction activities, as verified via piling driving construction applications, conduct a Vibration Impact Assessment prior to commencing construction on the project. The Vibration Impact Assessment shall provide the timeline, anticipated impacts, and mitigation to minimize the effects of vibration caused by onsite construction. Vibration levels shall not exceed the Caltrans vibration limits for building damage and human annoyance as shown in Table 3.10-9 and Table 3.10-10 below:¹⁶

¹⁶ Caltrans. 2020 *Transportation and Construction Vibration Guidance Manual*. (CT-HWANP-RT-20-365.01.01) September. Available at: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf

Type of Situation	Limiting Velocity (in/sec PPV)
Historic sites or other critical locations	0.1
Residential buildings, plastered walls	0.2–0.3
Residential buildings in good repair with gypsum board walls	0.4–0.5
Engineered structures, without plaster	1.0–1.5
in/sec = inches per second; PPV = peak particle velocity	

Table 3.10-9 Vibration Damage Potential Criteria

Table 3.10-10 Vibration Annoyance Potential Criteria

	Vibration Level (in/sec PPV)		
Human Response	Transient Sources	Continuous/ Frequent Intermittent Sources ¹	
Severe	2.0	0.4	
Strongly perceptible	0.9	0.10	
Distinctly perceptible	0.25	0.04	
Barely perceptible	0.04	0.01	

Examples of mitigation measures to reduce the effects of pile driving vibration include, but are not limited to:

- Construction Scheduling. Schedule pile driving construction activities to hours with the least potential to affect nearby institutional, educational, and office uses.
- Notifications. Notify neighbors of scheduled construction activities that would generate vibration. Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receptors.

Level of Significance

Significant and unavoidable

3.10.5 Cumulative Impacts

The geographic scope of the cumulative noise analysis is the City of Millbrae and adjacent city and airport areas. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, Environmental Impact Analysis) located in Millbrae, Burlingame, South San Francisco, and at the San Francisco International Airport in addition to the proposed plans.

Construction Noise and Vibration

Construction noise and vibration generated by the 2040 General Plan and Specific Plan, in combination with construction activities for other projects that may be constructed simultaneously could, without mitigation, substantially increase noise levels in the vicinity of future projects. Mitigation measures have been identified to help reduce noise and vibration from construction equipment from 2040 General Plan and Specific Plan projects. Therefore, unless construction of cumulative projects, including those proposed under development facilitated by the project, occur

in close proximity to each other (i.e., less than 200 feet), and simultaneously, noise and vibration from individual construction projects have a small chance of combining to create significant cumulative impacts. Although this scenario is unlikely, and mitigation measures would be implemented to the extent feasible, the potential remains for a cumulatively considerable increase in construction noise and vibration from 2040 General Plan and Specific Plan projects. Therefore, the cumulative impact related to construction noise and vibration would be significant and unavoidable.

Operational Mobile (Traffic) Noise

As discussed in Impact NOI-2, traffic noise increases from 2040 General Plan and Specific Plan development facilitated would not contribute to a noise level increase that exceeds impact criteria, including under future cumulative conditions. Even though traffic would gradually increase over the course of development facilitated by the project, the contribution would not be cumulatively considerable. Therefore, the cumulative impact related to operational mobile (traffic) noise would be less than significant.

Operational Stationary Noise

Implementation of the proposed plans would introduce new stationary noise sources to the ambient noise environment in the vicinity of the plan area, including new mechanical ventilation equipment. Proposed stationary noise sources may result in substantial permanent increases in ambient noise levels in excess of established standards. In addition, these sources may cumulatively combine with other, nearby projects to result in higher noise levels. However, operational noise from these sources is localized and rapidly attenuates within an urbanized setting due to the effects of intervening structures and topography that block the line of sight, and due to other noise sources closer to receptors that obscure project-related noise. In addition, Mitigation Measures NOI-2 and NOI-3 would reduce noise from stationary noise sources through setting noise limits and implementation of project-specific mitigation measures. However, as exact details of project-specific stationary noise activities are unknown at this stage of planning, stationary noise may still exceed operational noise limits, which may combine with other cumulative noise sources. Potential remains for a cumulatively considerable increase in construction noise and vibration from 2040 General Plan and Specific Plan projects. Therefore, the cumulative impact related to operational stationary noise would be significant and unavoidable.

Noise Land Use Compatibility

Proposed 2040 General Plan Policy HSHM-10.4 would require studies for land uses located near the major transportation noise sources, and Policy HSHM-10.5 would ensure review to analyze interior noise. These policies would ensure that future sensitive noise receptors in Millbrae that are exposed to combined cumulative transportation noise levels from roadway and rail noise would not exceed noise levels that the City considers acceptable for such proposed land uses. However, as no feasible mitigation exists to reduce aircraft noise, sensitive noise receptors may be exposed to noise from future San Francisco International Airport operations in exceedance of standards. Therefore, the cumulative impact related to potential inconsistency with noise land use compatibility standards would be cumulatively considerable.

Overall Level of Cumulative Significance

Significant and unavoidable

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3.11 Public Services and Recreation

3.11.1 Introduction

This section describes the existing conditions related to public services (fire, police, schools, library) and recreation (parks and open space) Citywide and in the Specific Plan area, as well as the relevant regulatory framework. This section also evaluates potential impacts to public services and recreation that could result from implementation of the 2040 General Plan and the Specific Plan. Information in this section is based on information obtained from the Millbrae 1998 General Plan and relevant provisions of the Millbrae Municipal Code, as well as from the Central County Fire Department, San Mateo County Sheriff's Office, Millbrae Elementary School District, San Mateo Union High School District, Millbrae Library, and the Millbrae Recreation Department.

3.11.2 Environmental Setting

Fire Protection

General Plan Area

The Central County Fire Department (CCFD) provides fire protection services to the Cities of Millbrae and Burlingame and the Town of Hillsborough. CCFD operates seven fire stations, with the following two stations located in the City of Millbrae:

- Fire Station No. 37 is located at 511 Magnolia Avenue. This station primarily serves the eastern
 portion of Millbrae and operates one fire engine and one fire utility vehicle.
- Fire Station No. 38 is located at 785 Crestview Drive. This station primarily serves the western portion of Millbrae and operates up to three fire engines.

CCFD provides a variety of services, including emergency medical services, fire suppression, urban search and rescue, community education, disaster preparedness, fire prevention and code compliance, and wildland urban interface (WUI) vegetation management. CCFD employs approximately 90 full-time employees, including 80 uniformed personnel, and maintains six engine companies and one truck company. The Chief Administrative Officer provides overall leadership and is responsible for the effective management, coordination, and service delivery of all aspects of the CCFD. The Deputy Fire Chief, Fire Marshal, and Battalion Chiefs oversee their respective organizational branches ensuring the overall day-to-day readiness of the CCFD.¹

Specific Plan Area

CCFD provides fire protection services to the Specific Plan area. As shown in Figure 3.11-1, Fire Station No. 37 is located immediately west of the Specific Plan area at 511 Magnolia Avenue and is the closest fire protection facility to the Specific Plan area.

¹ Central County Fire Department (CCFD). 2022. Our Fire Stations. https://ccfd.org/about-ccfd/fire-stations/ (accessed March 2022).

Police Protection

General Plan Area

The San Mateo County Sheriff's Office (SMCSO) provides police protection services to the City of Millbrae through the Millbrae Police Bureau, located in Millbrae City Hall at 581 Magnolia Avenue. Millbrae Police Bureau employs 21 people, including 15 sworn officers. At least two sworn officers are patrolling the City of Millbrae at any given time.²

Figure 3.11-1 shows the existing fire and police stations within the City of Millbrae.

Specific Plan Area

SMCSO provides police protection services to the Specific Plan area. As shown in Figure 3.11-1, the Millbrae Police Bureau is located immediately west of the Specific Plan area at 581 Magnolia Avenue and is the closest police protection facility to the Specific Plan area.

Public Schools

General Plan Area

Millbrae Elementary School District (MSD) and San Mateo Union High School District (SMUHSD) provide public school services to the City of Millbrae. MSD is a kindergarten through eighth grade district and operates four elementary schools and one middle school. SMUHSD operates seven high schools and one adult education school, with two high schools serving the City. Table 3.11-1 lists the MSD and SMUHSD schools that serve the City, and Figure 3.11-2 shows where the schools are located in the 2040 General Plan and Specific Plan areas.

Table 3.11-1	Public Schools in the 2040 General Plan Area

School Name	Grades	2020 – 2021 Enrollment	
Millbrae School District			
Green Hills Elementary	K — 5	348	
Lomita Park Elementary	К — 5	301	
Meadows Elementary	K – 5	407	
Spring Valley Elementary	K – 5	414	
Taylor Middle	6 – 8	762	
Total		2,232	
San Mateo Union High School District			
Mills High	9 – 12	1,180	

Source: California Department of Education (DOE). 2021. 2020-21 Enrollment by Grade.

https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=4168973&agglevel=district&year=2020-21 (accessed March 2022).

² San Mateo County Sheriff's Office (SMCSO). 2022. Millbrae Police Bureau. https://www.smcsheriff.com/patrol-services/millbrae-policebureau (accessed March 2022).

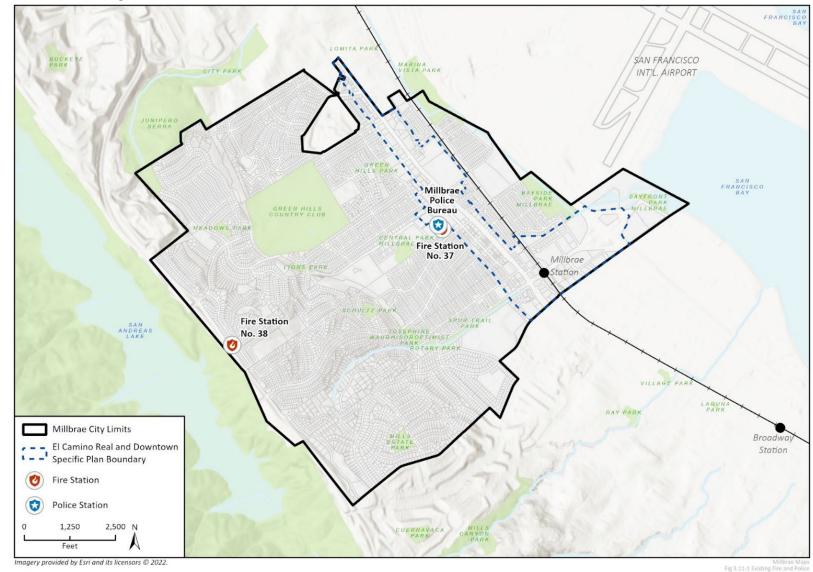


Figure 3.11-1 Existing Fire and Police Station Locations

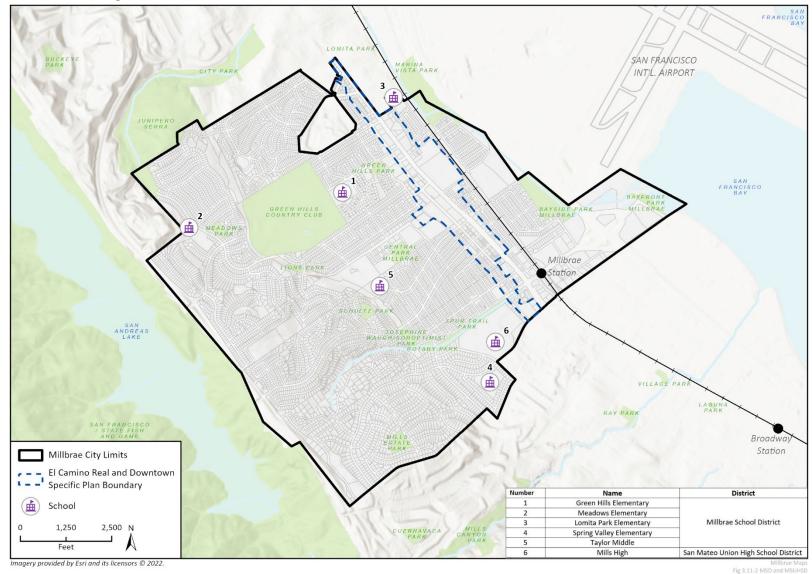


Figure 3.11-2 Existing MSD and SMUHSD School Locations

3.11-4

MILLBRAE SCHOOL DISTRICT

MSD's current enrollment is approximately 2,100 students. Enrollment has been declining in recent years due to the COVID-19 pandemic. MSD has a maximum student capacity of 2,300 students; however, when at maximum capacity, some students are located in portable classrooms that are in need of updating. Several MSD schools are in need of updates and facility upgrades. Lomita Elementary School currently has the most need for facility upgrades, although the school does not have the capacity to increase enrollment.³

Table 3.11-2 outlines the student generation rates utilized by MSD to calculate increased student enrollment associated with general housing development in Millbrae.

Grade	Generation Rate per Housing Unit	
К — 6	0.183	
7 – 8	0.066	
Total	0.249	

Table 3.11-2 MSD Student Generation Rates

Source: Millbrae School District Facilities Master Plan, 2018.

https://www.millbraeschooldistrict.org/cms/lib/CA50000692/Centricity/Domain/33/Facilities%20Master%20Plan.pdf (accessed April 2022).

SAN MATEO UNION HIGH SCHOOL DISTRICT

SMUHSD schools have been operating at slight overcapacity for several years. Mills High School currently has 5 students more than adopted capacity; however, SMUHSD estimates that 2019 through 2022 represented an apex in student enrollment and anticipates a decline in enrollment over the next several years due to the COVID-19 pandemic.⁴

Table 3.11-3 outlines the student generation rates utilized by SMUHSD to calculate increased student enrollment associated with general housing development in Millbrae.

Housing Type	Generation Rate per Housing Unit	
Single-family residential	0.10	
Multi-family residential	0.05	
Total	0.15	

Source: San Mateo Corridor Plan and Bay Meadows Specific Plan Amendment EIR. https://www.cityofsanmateo.org/DocumentCenter/View/3941/49-Public-Services (accessed April 2022).

³ Information provided by R. Crame, Chief Business Official, Millbrae School District (2022).

⁴ Information provided by D. Scatena, Director of Student Services, San Mateo Union High School District (2022).

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Specific Plan Area

MSD and SMUHSD provide public education services within the Specific Plan area. As shown in Figure 3.11-2, the closest schools to the Specific Plan area are Lomita Park Elementary, located immediately east of the Specific Plan area, and Green Hills Elementary School, located approximately 0.25-mile to the west.

Libraries

General Plan Area

The Millbrae Library, located at 1 Library Avenue, is one of 13 libraries operated by San Mateo County Libraries throughout greater San Mateo County. The Millbrae Library provides thousands of materials in multiple languages, and offers several programs to library patrons. Programs include weekly English language conversation meetings, weekly story readings for children of varying ages, and monthly science and technology instructional activities for elementary school children.⁵

Specific Plan Area

The Millbrae Library provides library services within the Specific Plan area. The Millbrae Library is located approximately 700 feet west of the Specific Plan area at 1 Library Avenue.

Parks and Recreational Facilities

Parks Classifications

There are approximately 47.1 acres of developed parkland within the City of Millbrae, which accounts for approximately 2.2 percent of the City's area. The City provides four different types of parkland, in addition to joint use planning and operation of school district athletic facilities for public recreation. Parks are classified by the Millbrae Recreation Department as follows: ⁶

- Developed Park: Improved, primarily unobstructed area with landscaping and recreational equipment such as play apparatuses and/or basketball courts. The purpose of parks is to provide for outdoor recreation and physical exercise near to residential and employment areas.
- **Undeveloped Park:** City owned parcels that have no recreational equipment or amenities.
- Developed Open Space: Any area that is vacant of any structures and is primarily maintained in its natural condition. In some cases, this category includes pathways, landscaping, and other improvements which are maintained. The provision of open space is intended to offer residents and visitors opportunities for quiet introspection in a location that provides visual relief from buildings, concrete, and noise associated with urban life.
- Undeveloped Open Space: City owned parcels, that are not developed and have no recreational equipment or amenities.

⁵ San Mateo County Libraries, Millbrae Library – Events. 2022.

https://smcl.bibliocommons.com/v2/events?_ga=2.87669393.8836195.1650303595-1472102994.1648149931&locations=1M (accessed April 2022).

⁶ Millbrae, City of. 2022. Millbrae Parks and Facilities Inventory, Analysis and Recommendations Report. Adopted January 7, 2022. https://www.ci.millbrae.ca.us/home/showpublisheddocument/25749/637775920140400000 (accessed March 2022).

Existing Parks and Recreation Facilities

GENERAL PLAN AREA

The City currently maintains 11 developed parks, two areas of developed open space, two undeveloped parks, and one area of undeveloped open space which totals 47.1 acres of developed parkland. Currently, there are approximately 2.1 acres of developed parkland per 1,000 residents in Millbrae (47.1 acres of parkland divided by 22.5 thousand residents), which is short of the City's goal to provide three acres of developed parkland per 1,000 residents.⁷ Additional parkland is available to Millbrae residents west of Millbrae city limits, including the Golden Gate National Recreation Area. In addition, several parks and trails owned and maintained by San Mateo County, including the 15-mile Crystal Springs Regional Trail, are also located west of the City and available to Millbrae residents. Table 3.11-4 summarizes the types and areas of parkland, and Figure 3.11-3 shows the locations of parkland throughout the City.

Park or Recreational Facility	Acreage ¹
Developed Parks	22.9
Bayside Manor Park	0.8
Central Park	8.1
Green Hills Park	2
Lion Bill Mitchell Park	0.8
Marina Vista Park	0.6
Meadows Park	2.3
Millbrae Skate Park	0.4
Mosta Grove Park	0.4
Rotary Park	1
Monterey Park	1.4
City Facilities	5.1
Developed Open Space	24.2
Spur Trail – Developed	21.7
Josephine Waugh Soroptimist Park	2.5
Undeveloped Parks	7.3
Mills Estate Undeveloped Park	4.7
Schultz Undeveloped Park	2.6
Undeveloped Open Space	26.4
Spur Trail – Undeveloped	26.4
Total Developed Parkland	47.1
Total Parkland	80.8

¹ Acreage is rounded to the nearest tenth acre. Numbers may not sum precisely due to rounding.

Source: Millbrae Parks and Facilities Inventory.

https://www.ci.millbrae.ca.us/home/showpublisheddocument/26020/637836467786530000

⁷ Millbrae, City of. 2022. Millbrae Parks and Facilities Inventory, Analysis and Recommendations Report. Adopted January 7, 2022. https://www.ci.millbrae.ca.us/home/showpublisheddocument/25749/637775920140400000 (accessed March 2022).

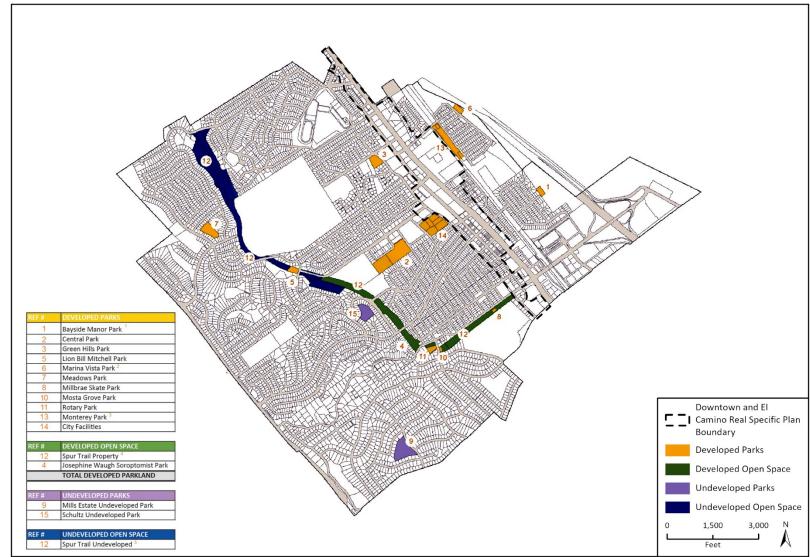


Figure 3.11-3 Existing Parks and Recreation Facility Locations

Basemap provided by Esri and its licensors © 2022

Additional data provided by City of Millbrae, 2021, and Carducci Associates, 2021.

SPECIFIC PLAN AREA

As shown in Figure 3.11-3, there is no parkland located within the Specific Plan area. The closest parks to the Specific Plan area are Monterey Park, a 1.4-acre park located immediately to the east; Green Hills Park, a 2-acre park located immediately to the west; and the City facilities located at 511 Magnolia Avenue immediately to the west.

3.11.3 Regulatory Framework

Federal Regulations

National Fire Protection Association Codes and Standards

The National Fire Protection Association (NFPA) publishes 300 codes and standards intended to minimize the possibility and effects of fire and other risks. Among these codes and standards are specific policies designed for fire protection. These standards range from fire protection and life safety systems, standards for portable fire extinguishers to recreational vehicle standards.

State Regulations

California Health and Safety Code (Sections 13000 et seq.)

California Health and Safety Code Sections 13100–13135 establish State fire regulations, including regulations for building standards (also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

California Code of Regulations, Title 24 (California Building Standards Code)

The 2019 California Building Standards Code (CBC), contained in California Code of Regulations, Title 24, became effective January 1, 2020. Section 701A.3.2 of the CBC requires that new buildings located in any Fire Hazard Severity Zone in State Responsibility Areas, any Local Agency Very-High Fire Hazard Severity Zone, or any Wildland-Urban Interface Fire Area designated by the enforcing agency for which an application for a building permit is submitted, comply with all sections of the Chapter.

California Code of Regulations, Title 24, Part 9 (California Fire Code)

The 2019 California Fire Code, contained in Part 9 of California Code of Regulations, Title 24, incorporates by adoption the 2018 International Fire Code of the International Code Council, with California amendments, and became effective January 1, 2020. The California Fire Code regulates building standards set forth in the CBC, fire department access, fire protection systems and devices, fire and explosion hazards safety, hazardous materials storage and use, and standards for building inspection. The California Fire Code also addresses dangerous conditions arising from the storage, handling, and use of hazardous materials and devices; conditions hazardous to life or property in the use or occupancy of buildings or premises; and provisions to assist emergency response personnel. The California Fire Code is updated and published every 3 years by the California Building Standards Commission.

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively for local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 provides that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection, as well as other public safety services. Section 35 at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." In City of Hayward v. Board of Trustees of California State University (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.

California Senate Bill 50

California Senate Bill 50 (SB 50) (funded by Proposition 1A, approved in 1998) limits the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development, and provides instead for a standardized developer fee. SB 50 generally provides for a 50/50 State and local school facilities funding match. SB 50 also provides for three levels of statutory impact fees. The application level depends on whether State funding is available, whether the school district is eligible for State funding, and whether the school district meets certain additional criteria involving bonding capacity, year-round school, and the percentage of moveable classrooms in use.

California Government Code Section 65995(b) (Title 7, Chapter 4.9) and Education Code Section 17620

California Government Code Section 65995 authorizes school districts to collect impact fees from developers of new residential and commercial/industrial building space. Section 65995 was established under the School Facilities Act of 1986 and refined and amended by the SB 50 to provide further guidance and restrictions on fee limits and fee types. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions.

No fees are charged for new construction or additions that are under 500 square feet. The payment of school impact fees by developers are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local laws. MSD and SMUHSD determine fees annually in accordance with California Government Code Section 65995. Current MSD and SMUHSD development impact fees are shown below in Table 3.11-5.

District	Residential (per square foot)	Commercial (per square foot)
MSD ⁸	\$2.45	\$0.40
SMUHSD ⁹	\$1.39	\$0.22

Table 3.11-5 Millbrae School Districts Development Impact Fees

Local Regulations

Millbrae Municipal Code Chapter 9.30 (Millbrae Fire Code)

The Millbrae Fire Code (Chapter 9.30 of Millbrae Municipal Code) was subsequently adopted in 2019 after the City's adoption of the California Fire Code. The Millbrae Fire Code incorporates the 2019 California Fire Code as well as local amendments proposed by CCFD. Local amendments include but are not limited to signage and lane marking requirements, provisions for emergency access to secure facilities, and inspection procedures.¹⁰

Millbrae Municipal Code Article 31

The City imposes development impact fees through Millbrae Municipal Code (MMC) Articles XVIII and Article XXXI to fully or partially offset the costs of public capital facilities and infrastructure that is needed to serve new demand created by development projects that derive from projects. All new construction in the City of Millbrae is required to pay Development Impact Fees. There are currently two types of fees: Citywide fees, which are applied Citywide, and area fees, which are currently applied in the Millbrae Station Area Specific Plan area. The fees are imposed based on specified capital improvement categories, including fees for transportation and mobility improvements, library, general government facilities, recreation services, public safety, park acquisition and facilities, administration, sanitary sewer utilities, and other capital improvements.

Impact Fees are different from, and apply in addition to, utility connection and planning application and building permit application fees, which are used to cover the cost of the City's processing for permits and direct utility costs. The City may also impose other fees or exactions imposed pursuant to the Subdivision Map Act, or other measures required to mitigate site-specific impacts of a development project, including, but not limited to, mitigations pursuant to the California Environmental Quality Act; regulatory and processing fees; fees required pursuant to a development agreement; funds collected pursuant to a reimbursement agreement that exceed the applicant's share of public improvement costs; or assessment district proceedings, benefit assessments, or taxes.

Additionally, the Millbrae Municipal Code, Chapter 10.20 et seq. Park and Recreation Land includes requirements pursuant to Government Code Sections 66418 and 66477 related to the requirements for the dedication of land or payment of a fee in lieu thereof, or both, as a condition of approval of a final subdivision map.

⁸ Millbrae School District (MSD). 2022. Developer & School Impact Fees. https://www.millbraeschooldistrict.org/Page/195 (accessed June 2022).

⁹ San Mateo Union High School District (SMUHSD). 2022b. School Impact (Developer) Fees. https://www.smuhsd.org/Page/5186 (accessed June 2022).

¹⁰ Millbrae Municipal Code (MMC). 2022. Chapter 9.30.

https://www.codepublishing.com/CA/Millbrae/html/Millbrae09/Millbrae0930.html (accessed March 2022).

The City also has Affordable Housing Commercial Linkage Impact Fees, which are assessed on new non-residential construction Citywide. The City's current fee schedule is shown below in Table 3.11 6.

Land Use	Citywide Fee	
Residential	Per dwelling unit	
Single Family	\$71,309.30	
Multi-Family	\$52,172.91	
Non-residential	Per 1,000 square feet	
Commercial	\$9,354.93	
Office	\$4,729.27	
Industrial	\$1,600.30	
Hotel	Per hotel room	
	\$1,756.80	

Table 3.11 6	Millbrae Citywide Development Impact Fees
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Source: City of Millbrae Planning Division. 2022. City of Millbrae Development Impact Fees.

City of Millbrae General Plan

The current Millbrae General Plan contains policies related to public services and recreation, but they would be replaced by the proposed 2040 General Plan.

3.11.4 Impacts and Mitigation Measures

Significance Criteria

The City of Millbrae utilizes the following 2022 CEQA Guidelines Appendix G significance criteria questions related to Public Services and Recreation.

Would the 2040 General Plan or Specific Plan:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
 - 1. Fire protection?
 - 2. Police protection?
 - 3. Schools?
 - 4. Parks?
 - 5. Other public facilities?
- b) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated

c) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment

Approach to Analysis

Fire and Police Services

Impacts on fire and police services were determined by evaluating the proposed plans' effect on existing fire and police station response times. Projected population associated with buildout of the proposed 2040 General Plan was also reviewed. In addition, fire and police (emergency) access to the plan areas was evaluated. Furthermore, impacts related to fire and police service were also based on information received in response to request letters sent to the respective service providers for input related to possible impacts.

School and Library Services

Impacts on schools were determined by evaluating the proposed plans' effect on existing school enrollment. Projected population and school enrollment data provided by the California Department of Education and the MSD and SMUHSD were also reviewed. Furthermore, impacts related to schools and other public facilities (i.e., libraries) were also based on information received in response to request letters sent to the respective service providers for input related to possible impacts.

EIR Scoping Comments Consideration

This section also addresses a verbal public comment received during the EIR public scoping meeting, regarding school enrollment needs as the Millbrae population and housing grows. Assessment of school facility impacts associated with implementation of the proposed plans and associated growth is discussed under Impact PS-3.

Specific Significance Thresholds

For purposes of this analysis, the following thresholds are used to evaluate the significance of public service and recreation impacts resulting from implementation of the proposed plans:

- Result in additional population or activities requiring fire protection, police protection, school, or library services in a manner that necessitates the need for new or altered facilities, the construction of which would result in significant construction-related traffic air quality, greenhouse gas (GHG) emissions, or noise impacts. If new or altered facilities are proposed or determined to be needed, then determination of significance of construction-related transportation, air quality, GHG emissions, hazards, and noise impacts is based on the respective specific thresholds of significance listed in Section 3.12, *Transportation*; Section 3.2, *Air Quality*; Section 3.6, *Greenhouse Gas Emissions and Energy*; Section 3.7, *Hazards, Hazardous Materials, and Wildfire*; and Section 3.10, *Noise*.
- Result in additional population using recreational facilities and causing physical deterioration of such facilities
- Result in additional population creating need for new or physically altered parks, the construction
 of which could cause significant environmental impacts, in order to maintain acceptable
 recreational facilities per capita ratio (specifically 3 acres of park per 1,000 persons).

Impact Evaluation

Need for New or Altered Fire Protection Facilities

Significance Criterion a1	Would the proposed plans result in substantial adverse physical impacts
	associated with the provision of new or physically altered fire protection
	facilities, or the need for new or physically altered fire protection
	facilities, the construction of which could cause significant environmental
	impacts, in order to maintain acceptable service ratios, response times or
	other performance objectives?

Impact PS-1 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND THE SPECIFIC PLAN WOULD INCREASE THE POPULATION OF MILLBRAE, GENERATING ADDITIONAL NEED FOR FIRE PROTECTION SERVICES. HOWEVER, COMPLIANCE WITH THE 2040 GENERAL PLAN AND SPECIFIC PLAN POLICIES WOULD RESULT IN IMPACTS RELATED TO THE NEED FOR NEW OR ALTERED FIRE FACILITIES THAT ARE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

The 2040 General Plan and Specific Plan would allow a net increase of approximately 1,880 residential units and facilitate the addition of 5,151 net new residents in Millbrae within the downtown and El Camino Real corridor. As a result, CCFD could need to incrementally increase their fire protection services to the City of Millbrae through the year 2040, which could in turn require the construction of new facilities to accommodate subsequent personnel, equipment, and vehicles. The placement and potential impacts of a new fire protection facilities are unknown at this time; if construction or expansion of future facilities are needed separate environmental review would be required, which could result in development and implementation of future project-specific construction-related mitigation measures. The 2040 General Plan and Specific Plan facilitate development within areas of Millbrae that are currently developed. As such, construction of new fire protection facilities, if required, would likely occur on property previously disturbed or developed and, thus, within the programmatic analysis for buildout under the 2040 General Plan and Specific Plan as analyzed throughout this EIR. Additionally, construction would be required to comply with all applicable Federal, State, and local regulations governing the provision of fire protection services, including adequate fire access, fire flows, and number of hydrants. This includes the 2019 California Fire Code, which contains project-specific requirements such as construction standards in new structures and remodels, road widths and configurations designed to accommodate the passage of fire trucks and engines, and requirements for sprinkler systems and minimum fire flow rates for water mains. This would reduce the potential for adverse construction impacts associated with construction of new or expanded fire facilities associated with implementation of the 2040 General Plan and Specific Plan. However, as determined in Section 3.10, Noise, construction noise and vibration impacts of the proposed plans would be significant and unavoidable. Therefore, construction impacts related to potential need for new or expanded fire protection facilities would be considered significant and unavoidable.

Operation

2040 GENERAL PLAN

As future buildout occurs under the 2040 General Plan, the City will evaluate operations and deployment of services to efficiently use resources. Additionally, new development under buildout of the 2040 General Plan would be required to comply with all applicable Federal, State, and local regulations governing the provision of fire protection services, including adequate fire access, fire flows, and number of hydrants. This includes the 2019 California Fire Code, which contains project-specific requirements such as construction standards in new structures and remodels, road widths and configurations designed to accommodate the passage of fire trucks and engines, and requirements for sprinkler systems and minimum fire flow rates for water mains. Further, the 2040 General Plan would allow approximately 1,880 new residential units in Millbrae and facilitate the addition of approximately 5,151 residents in the 2040 General Plan area, which would increase the demand for fire protection services. As a result, CCFD would need to incrementally increase their fire services to the City of Millbrae through the year 2040.

In addition, the 2040 General Plan Health, Safety, and Hazardous Materials Element contains a number of goals and associated policies, listed below, for providing adequate fire protection services in Millbrae.

Goal HSHM-8 Minimize potential fire hazard risk to lives and properties.

Policy HSHM-8.1	Adequate Staffing and Equipment. The City shall ensure that growth and
	development does not outpace the expansion of the Central County Fire
	Department staffing, facilities, equipment, and resources and shall require
	the payment of development impact fees to fund new public safety facilities
	or improvements to existing public safety facilities to maintain the City's
	existing level of service.

- **Policy HSHM-8.2** Adequate Water Supply for Fire Suppression. The City shall require new development to have adequate water supplies to meet the fire-suppression needs of the project without compromising existing fire suppression services to existing uses.
- **Policy HSHM-8.3** Fire Access and Building Standards. The City shall continue to include the Central County Fire Department in the review of new development proposals to ensure new projects adequately address fire access and building standards.
- **Policy HSHM-8.4** Fire Prevention Education. The City shall support efforts by the Central County Fire Department to maintain and implement a fire prevention and safety education program for Millbrae residents and businesses. The Central County Fire Department shall ensure that the needs of high-risk population groups, such as seniors and non-native English speakers, are met with tailored programs.

Consistent with Policy HSHM-8.1, as future buildout occurs under the 2040 General Plan, the City will evaluate operations and deployment of services to efficiently use resources and ensure that development does not exceed the service capacity of CCFD. Further, Policies HSHM-8.2 and HSHM-8.3 would ensure that development facilitated by the 2040 General Plan would be served by adequate water supplies and would comply with applicable fire access and building standards so

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that CCFD can continue to adequately serve the City. Finally, Policy HSHM-8.4 would aim to reduce the number of potential fires in the City, which would potentially reduce the number of calls CCFD must respond to under buildout of the 2040 General Plan. Because the 2040 General Plan regulates the provision of fire protection services concurrently with 2040 General Plan development and population growth, operational impacts related to provision of fire protection services would be less than significant.

SPECIFIC PLAN

As future buildout occurs under the Specific Plan, the City will evaluate operations and deployment of services to efficiently use resources. Additionally, new development under buildout of the Specific Plan would be required to comply with all applicable federal, State, and local regulations governing the provision of fire protection services, including adequate fire access, fire flows, and number of hydrants. This includes the 2019 California Fire Code, which contains project-specific requirements such as construction standards in new structures and remodels, road widths and configurations designed to accommodate the passage of fire trucks and engines, and requirements for sprinkler systems and minimum fire flow rates for water mains. The Specific Plan would allow approximately 1,880 net new residential units in the Specific Plan area, which would facilitate the addition of approximately 5,151 residents in the Specific Plan area. The additional population would increase the demand for fire protection services. As a result, CCFD would need to incrementally increase their fire services to the Specific Plan area through the year 2040.

In addition, the General Plan would add the following policy related to the establishment of new area development impact fees for the Specific Plan area:

Policy LU-10.3 Development Impact Fees. The City shall regularly evaluate and update development impact fees, including area fees for specific plan areas, to ensure that new development pays its fair share of costs to offset the costs of public capital facilities and infrastructure that is needed to serve new demand created by development projects. This includes, but is not limited to, fees for public safety, libraries, general government facilities, transportation (including both roadway and alternative mode facility improvements), parks and recreation land and facilities, water, sanitary sewer, stormwater drainage, and other required capital facilities and infrastructure.

Once a fee is established, General Plan Policy LU-10.3 would ensure that development facilitated by the Specific Plan would be subject to fees to support additional fire facilities within the Specific Plan area. Therefore, the Specific Plan would have less than significant impacts related to the provision of fire protection services.

In summary, there is potential for CCFD to increase staffing levels through the year 2040 to meet established standards under buildout of the 2040 General Plan and Specific Plan. Because the 2040 General Plan regulates the provision of fire protection services concurrently with Specific Plan development and population growth, operational impacts related to provision of fire protection services would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Need for New or Altered Police Protection Facilities

Significance Criterion a2:	Would the proposed plans result in substantial adverse physical impacts
	associated with the provision of new or physically altered police
	protection facilities, or the need for new or physically altered fire
	protection facilities, the construction of which could cause significant
	environmental impacts, in order to maintain acceptable service ratios,
	response times or other performance objectives?

Impact PS-2 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND THE SPECIFIC PLAN WOULD INCREASE POPULATION IN MILLBRAE, GENERATING ADDITIONAL NEED FOR POLICE PROTECTION SERVICES. HOWEVER, COMPLIANCE WITH 2040 GENERAL PLAN AND SPECIFIC PLAN POLICIES WOULD RESULT IN IMPACTS RELATED TO THE NEED FOR NEW OR ALTERED POLICE FACILITIES THAT ARE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

The 2040 General Plan and Specific Plan would allow approximately 1,880 residential units and facilitate the addition of 5,151 new residents in Millbrae within the downtown and El Camino Real corridor. As a result, SMCSO could need to incrementally increase their police services to the City of Millbrae through the year 2040, which could in turn require the construction of new facilities to house subsequent personnel, equipment, and vehicles. The placement and potential impacts of a new police facilities are unknown at this time; if construction or expansion of future facilities are needed separate environmental review would be required, which could result in development and implementation of future project-specific construction-related mitigation measures. The 2040 General Plan and Specific Plan facilitate development within areas of Millbrae that are currently developed. Therefore, construction of new police facilities, if required, would likely occur on property previously disturbed or developed and thus within the programmatic analysis for buildout under the 2040 General Plan and Specific Plan as analyzed throughout this EIR. This would reduce the potential for adverse construction impacts associated with construction of new or expanded police protection facilities associated with implementation of the 2040 General Plan and Specific Plan. Thus, construction impacts related to potential need for new or expanded police protection facilities would be considered less than significant.

Operation

2040 GENERAL PLAN

As future buildout occurs under the 2040 General Plan, the City will evaluate operations and deployment of services to efficiently use resources. New development under buildout of the 2040 General Plan would be required to comply with all applicable Federal, State, and local regulations governing the provision of police protection services, including adequate emergency access and community safety measures. Further, the 2040 General Plan would allow approximately 1,880 residential units and would facilitate the addition of 5,151 new residents in Millbrae. As a result,

SMCSO would need to incrementally increase their police services to the City of Millbrae through the year 2040.

In addition, the 2040 General Plan Health, Safety, and Hazardous Materials Element contains goals and associated policies, listed below, for providing adequate police protection services in Millbrae.

Goal HSHM-9 Provide high-quality law enforcement services to ensure a safe community.

- Policy HSHM-9.1 Adequate Staffing and Facilities. The City shall support the San Mateo County Sheriff's Office in ensuring adequate staffing and facilities for the Millbrae Police Bureau to achieve desired levels of public safety.
- **Policy HSHM-9.2 Community Policing Strategies.** The City shall continue promoting community policing strategies that support community partnerships and problem-solving techniques that build public trust and proactively address public safety issues.

Because the 2040 General Plan regulates the provision of police protection services concurrently with 2040 General Plan development and population growth, operational impacts related to provision of police protection services would be less than significant.

SPECIFIC PLAN

As future buildout occurs under the Specific Plan, the City will evaluate operations and deployment of services to efficiently use resources. New development under buildout of the Specific Plan would be required to comply with all applicable federal, State, and local regulations governing the provision of police protection services, including adequate emergency access and community safety measures. The Specific Plan would allow approximately 1,880 net new residential units and would facilitate the addition of approximately 5,151 residents in the Specific Plan area, which would increase the demand for police protection services. As a result, SMCSO would need to incrementally increase their police services to the Specific Plan area through the year 2040.

As described under Impact PS-1 above, the General Plan would include Policy LU-10.1, which states that the City shall establish an Area Development Impact Fee for the Downtown and El Camino Real Specific Plan. Fees established in accordance with this policy would ensure that development facilitated by the Specific Plan would support additional fire facilities within the Specific Plan area. Therefore, the Specific Plan would have less than significant impacts related to the provision of police protection services.

In summary, there is potential for SMCSO to increase staffing levels through the year 2040 to meet established standards under buildout of the 2040 General Plan and Specific Plan. Because the 2040 General Plan regulates the provision of police protection services concurrently with Specific Plan development and population growth, operational impacts related to provision of police protection services would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Need for New or Altered School Facilities

Significance Criterion a3: Would the proposed plans result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Impact PS-3 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN WOULD RESULT IN AN INCREASE IN POPULATION OF SCHOOL-AGED CHILDREN IN MILLBRAE. THIS WOULD INCREASE DEMAND FOR SCHOOL SERVICES AND POTENTIALLY CREATE THE NEED FOR NEW SCHOOL FACILITIES. HOWEVER, COMPLIANCE WITH 2040 GENERAL PLAN POLICIES AND PAYMENT OF SCHOOL IMPACT FEES WOULD RESULT IN IMPACTS RELATED TO THE NEED FOR NEW OR ALTERED SCHOOL FACILITIES THAT ARE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

The 2040 General Plan and Specific Plan would allow approximately 1,880 residential units and facilitate the addition of 5,151 new residents in Millbrae within the downtown and El Camino Real corridor. As a result, MSD and SMUHSD could need to incrementally increase their school services to the City of Millbrae through the year 2040, which could in turn require the construction of new facilities to accommodate subsequent students, staff, and facility space. The placement and potential impacts of a new school facilities are unknown at this time; if construction or expansion of future facilities are needed, separate environmental review would be required, which could result in development and implementation of future project-specific construction-related mitigation measures. The 2040 General Plan and Specific Plan facilitate development within areas of Millbrae that are currently developed. Therefore, construction of new school facilities, if required, would likely occur on property previously disturbed or developed and thus within the programmatic analysis for buildout under the 2040 General Plan and Specific Plan as analyzed throughout this EIR. This would reduce the potential for adverse construction impacts associated with construction of new or expanded school facilities associated with implementation of the 2040 General Plan and Specific Plan. Thus, construction impacts related to potential need for new or expanded school facilities would be considered less than significant.

Operation

2040 GENERAL PLAN

Table 3.11-7 summarizes the potential increase in student population for MSD and SMUHSD that could occur as a result of the 2040 General Plan and Specific Plan, using the generation rates identified in Table 3.11-2 and Table 3.11-3.

District	Generation Rate per Housing Unit	Number of Net New Housing Units	Total Students Generated
Millbrae Elementary School District	0.249	1,880	468
San Mateo Union High School District	0.15	1,880	282
Total		1,880	750

As shown above in Table 3.11-7, buildout of the 2040 General Plan and Specific Plan would add approximately 468 students to MSD and 282 students to SMUHSD, or 750 total students within the City of Millbrae by 2040.

Although both MSD and SMUHSD anticipate a decline in enrollment in the next several years,¹¹ the addition of 468 elementary and middle school students and 282 high school students within Millbrae could exceed anticipated school districts' capacity. Such potential additional students would increase enrollment in schools in Millbrae.

The Land Use Element of the 2040 General Plan includes the following policy specific to education and the provision of school facilities in the City:

Policy LU-8.2 Community-Serving Facilities. The City shall ensure adequate provision of community-serving facilities to serve current and future residents, including the Millbrae Library, schools, and other educational institutions, as well as child and senior day care facilities.

Policy LU-8.2 would ensure that the City coordinates with MSD and SMUHSD on long range planning efforts to facilitate MSD and SMUHSD planning for future growth. Further, all future development facilitated by 2040 General Plan is required to pay school impact fees which, pursuant to Section 65995(3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), are "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Because the 2040 General Plan regulates the provision of school services concurrently with 2040 General Plan development and population growth and with payment of mandatory school impact fees by developers for future projects in the City, operational impacts related to provision of school services would be less than significant.

SPECIFIC PLAN

As described above, 750 new students will be added to Millbrae by 2040 under implementation of the 2040 General Plan and Specific Plan. Although both MSD and SMUHSD anticipate a decline in enrollment in the next several years,¹² the addition of 468 elementary and middle school students and 282 high school students could exceed anticipated student capacity. These additional students would increase enrollment in schools in the Specific Plan area.

All future development facilitated by the Specific Plan would be required to pay school impact fees which, pursuant to Section 65995(3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), are "deemed to be full and complete mitigation of the impacts of any

¹¹ Information provided by R. Crame, Chief Business Official, Millbrae School District (2022) and D. Scatena, Director of Student Services, San Mateo Union High School District (2022).

¹² Information provided by R. Crame, Chief Business Official, Millbrae School District (2022) and D. Scatena, Director of Student Services, San Mateo Union High School District (2022).

legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Therefore, payment of these fees would ensure that impacts related to the provision of school facilities would be less than significant.

Because the 2040 General Plan regulates the provision of school services concurrently with Specific Plan development and population growth and with payment of mandatory school impact fees by developers within the Specific Plan area, operational impacts related to provision of school services would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Need for New or Altered Parks/Recreational Facilities

Significance Criterion a4	Would the proposed plans result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?
Significance Criterion b:	Would the proposed plans increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
Significance Criterion c:	Does the proposed plans include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Impact PS-4 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND THE SPECIFIC PLAN WOULD RESULT IN AN INCREASE IN THE CITY'S POPULATION. THIS WOULD INCREASE DEMAND FOR AND USE OF PARKS AND POTENTIALLY CREATE THE NEED FOR NEW OR ALTERED PARK FACILITIES. HOWEVER, COMPLIANCE WITH 2040 GENERAL PLAN AND SPECIFIC PLAN POLICIES WOULD RESULT IN IMPACTS RELATED TO THE NEED FOR NEW OR ALTERED PARKS OR RECREATIONAL FACILITIES THAT ARE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

The 2040 General Plan and Specific Plan would allow approximately 1,880 residential units and facilitate the addition of 5,151 new residents in Millbrae within the downtown and El Camino Real corridor. The proposed 2040 General Plan and Specific Plan do not include designation of additional land for parks or recreational facilities within the City that would require construction and might have an adverse physical effect on the environment. However, as an indirect result, existing parks and recreational facilities could be used more frequently and potentially deteriorate at an accelerated pace and the Millbrae Recreation Department could need to incrementally increase their parks and recreational services to the City of Millbrae through the year 2040, which could in

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turn require the construction of new facilities to accommodate subsequent recreational visitors and facility space. The placement and potential impacts of a new parks and recreational facilities are unknown at this time; if construction or expansion of future facilities are needed separate environmental review would be required, which could result in development and implementation of future project-specific construction-related mitigation measures. The 2040 General Plan and Specific Plan facilitate development within areas of Millbrae that are currently developed. Therefore, construction of new parks and recreational facilities, if required, would likely occur on property previously disturbed or developed and thus within the programmatic analysis for buildout under the 2040 General Plan and Specific Plan as analyzed throughout this EIR. This would reduce the potential for adverse construction impacts associated with construction of new or expanded parks and recreational facilities associated with implementation of the 2040 General Plan and Specific Plan. Thus, construction impacts related to potential need for new or expanded parks and recreational facilities would be considered less than significant.

Operation

2040 GENERAL PLAN

According to the DOF, the population of Millbrae as of 2021 was 22,509;¹³ thus, the 2040 General Plan would increase the City's population to 27,660, which would result in a ratio of 1.7 acres of developed parkland per 1,000 residents. This would be below the City's target ratio of 3 acres of developed parkland per 1,000 residents. Therefore, implementation of the 2040 General Plan would require the development of additional parkland to maintain the City's established parkland to population ratio.

The 2040 General Plan would not include designation of additional land for parks or recreational facilities within the City. However, as discussed previously, the 2040 General Plan would facilitate the addition of approximately 5,151 residents in Millbrae.

To ensure that parkland and park access increase concurrently with population growth, the Recreation, Arts, and Culture Element of the 2040 General Plan includes the goals and policies related to parks and recreation. Goals and policies from the 2040 General Plan related to park land, access, and recreation are as follows:

Goal RAC-1 Provide high-quality, well-maintained, diversified, and accessible parks, open space, and recreational opportunities for all Millbrae residents.

Policy RAC-1.1 Parks, Recreation and Open Space Master Plan. The City shall develop and implement a parks, recreation, and open space master plan, consistent with the Parks and Facilities Inventory, Analysis and Recommendations Report. This will provide clear guidance and recommendations on how to meet the demands for future recreational, programming, environmental, and maintenance needs, as well as establish priorities for future park, recreation and open space renovations and facility improvements. The plan shall also evaluate demand for dog exercise and aquatic facilities and provide recommendations.

¹³ California Department of Finance (DOF). 2021. https://dof.ca.gov/forecasting/demographics/estimates/ (accessed April 2022).

Policy RAC-1.2	Park Acquisition Plan. The City shall develop and implement a Park
	Acquisition Plan to provide a plan to acquire and/or improve existing
	undeveloped parkland in the City to maintain the General Plan standard of
	three acres of developed parkland per 1,000 residents.

- **Policy RAC-1.3 Diversified Recreational Activities.** The City shall continue to encourage the provision of recreational activities for people, as well as their dogs, of all ability levels, consistent with the changing Millbrae demographics.
- Policy RAC-1.4 New and Expanded Recreation Facilities. The City shall pursue opportunities through public and private means for developing new, modern recreational facilities and/or expanding and enhancing existing recreation facilities.
- **Policy RAC-1.5 Community Partnerships.** The City shall continue to coordinate with local school districts in the joint use of school recreational facilities, as well as pursue partnerships with other agencies, community groups, and organizations.
- Policy RAC-1.6 Impact Fees and Park Dedication Requirements for Residential Development Projects. The City shall continue to require new residential development to pay the City's Development Impact Fee for Park Acquisition and Facilities and Recreation Services. The purpose of the Park Acquisition and Facilities Fee is to acquire new parkland and to fund park facilities required to serve new development in the City to maintain the General Plan standard of three acres of developed parkland per 1,000 residents. The Recreation Services fee is to fund new development's share of planned new recreation facilities or improvements to existing recreation facilities. The City shall also continue to require all residential subdivisions dedicate land, pay a fee in lieu thereof, or both, at the option of the city, for park or recreational purposes according to the most recent adopted standards and impact fees.
- **Policy RAC-1.10 Spur Trail Property Improvements.** The City shall complete and enhance the function of the Spur Trail Property as an open space and recreational amenity by improving additional landscaping, trails, benches, ADA access, lighting, stormwater management facilities, water fountains, access for emergency response and maintenance, safety, and related features.

Policies RAC-1.1 through RAC 1.5 would ensure that the City would continue to plan for parks and recreational facilities through the year 2040. Further, Policies RAC-1.5 and RAC-1.10 would facilitate the addition of parkland in Millbrae, either through access to school recreational facilities or development of the Spur Trail, which would increase the amount of parkland available to City residents. Policy RAC-6, in addition to Millbrae Municipal Code Chapter 10.20, would ensure that parkland or in-lieu payments for parkland would be provided as residential subdivisions develop in Millbrae. Additionally, as discussed under *Environmental Setting*, thousands of acres of parkland are available to Millbrae residents just west of the City, including the Golden Gate National Recreation Area and parks and trails maintained by San Mateo County. Because the 2040 General Plan and the Municipal Code regulate provision of parkland concurrently with development and population growth and because of substantial parkland available outside of city limits and with payment of

mandatory parkland impact fees by developers for future projects in the City, operational impacts related to provision of and access to parks and recreation facilities would be less than significant.

SPECIFIC PLAN

According to the DOF, the population of Millbrae as of 2021 was 22,509;¹⁴ thus, the Specific Plan would increase the City's population to 27,660, which would result in a ratio of 1.7 acres of developed parkland per 1,000 residents. Therefore, implementation of the Specific Plan would require the development of additional parkland to maintain the City's established parkland to population ratio.

The Specific Plan would allow approximately 1,880 residential units in the Specific Plan area, which would facilitate the addition of approximately 5,151 residents. An increase in population would increase demand for parks and recreation facilities and potentially necessitate new or physically altered facilities to meet the increased demand for parkland. Construction of new parks and physical alteration of existing parks to accommodate increasing population may result in environmental impacts. However, it is not known at this time where new parks may be constructed or what improvements may occur at existing parks.

The Specific Plan contains policies and design standards related to parks and recreation. In addition, goals, policies, and mitigation measures included throughout this EIR would ensure that impacts from construction of new parks or alternation of existing parks would reduce impacts to the extent feasible. Policies and design standards in the Specific Plan related to park land, access, and recreation are as follows:

Policy OS-2	Network of Public Open Spaces. The City shall provide a network of public open spaces, including outdoor plazas, parks, and parklets, that is connected by pedestrian walkways and paths.
Policy OS-3	Sustainable Open Space and Parks . The City shall require open spaces and parks to incorporate sustainability measures, such as including native plant species and drought tolerant plants that require minimal irrigation, permeable paving, solar-powered lighting, and other similar features
Policy OS-4	Park Acquisition and Facilities Fee for Residential Development Projects. The City shall continue to require new residential development to pay the City's Development Impact Fee for Park Acquisition and Facilities and Recreation Services. The purpose of the Park Acquisition and Facilities Fee is to acquire new parkland and to fund park facilities required to serve new development in the City to maintain the General Plan standard of three acres of improved parkland per 1,000 residents. The Recreation Services fee is to fund new development's share of planned new recreation facilities or improvements to existing recreation facilities
Policy OS-6	Park Dedication and/or Fees for Residential Subdivisions. The City shall continue to require all residential subdivisions to dedicate land, pay a fee in lieu thereof, or both, at the option of the City, for park or recreational purposes, according to the most recent adopted standards and impact fees

¹⁴ California Department of Finance (DOF). 2021. https://dof.ca.gov/forecasting/demographics/estimates/ (accessed April 2022).

- **DS-8.4** Privately owned publicly accessible open spaces shall be visible and directly accessible from public streets, with clear signage
- **DS-8.5** Open Spaces should be designed for universal access and should be provided with comfortable seating, shade, access to daylight and air, and landscaping
- **DS-8.7** Publicly accessible open space provided in all new development shall comply with City of Millbrae's Parkland dedication requirements.

Policies OS-2 through OS-6 would ensure that the City would continue to develop parks and recreational facilities through the year 2040, which would increase the amount of improved parkland available to City residents. Further, Policy OS-6 in addition to Millbrae Municipal Code Chapter 10.20 would ensure that parkland or in-lieu payments for parkland would be provided as residential subdivisions develop in the Specific Plan area. Finally, Design Standards DS-8.4, DS-8.5, andDS-8.7 would ensure provision of accessible open spaces that would be consistent with the City's parkland dedication requirements. Because the Specific Plan and the Municipal Code regulate provision of parkland concurrently with development and population growth, impacts to parks and recreation facilities would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Need for New or Altered Library Facilities

Significance Criterion a5	Would the proposed plans result in substantial adverse physical impacts
	associated with the provision of new or physically altered public facilities,
	or the need for new or physically altered public facilities, the construction
	of which could cause significant environmental impacts, in order to
	maintain acceptable service ratios, response times or other performance
	objectives?

Impact PS-5 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN WOULD RESULT IN AN INCREASE IN THE CITY'S POPULATION. THIS WOULD INCREASE DEMAND FOR PUBLIC FACILITIES AND POTENTIALLY CREATE THE NEED FOR NEW PUBLIC FACILITIES, INCLUDING LIBRARIES. HOWEVER, COMPLIANCE WITH 2040 GENERAL PLAN POLICIES WOULD RESULT IN IMPACTS RELATED TO NEED FOR NEW OR ALTERED PUBLIC FACILITIES THAT ARE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

The 2040 General Plan and Specific Plan would allow approximately 1,880 residential units and facilitate the addition of 5,151 new residents in Millbrae within the downtown and El Camino Real corridor. The proposed 2040 General Plan and Specific Plan do not include designation of additional land for libraries or other public facilities within the City that would require construction and might have an adverse physical effect on the environment. However, as an indirect result, San Mateo

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

County Libraries could need to incrementally increase their library services to the City of Millbrae through the year 2040, which could in turn require the construction of new facilities to accommodate subsequent library visitors and facility space. The placement and potential impacts of a new library facilities are unknown at this time; if construction or expansion of future facilities are needed separate environmental review would be required, which could result in development and implementation of future project-specific construction-related mitigation measures. The 2040 General Plan and Specific Plan facilitate development within areas of Millbrae that are currently developed. Therefore, construction of new library facilities, if required, would likely occur on property previously disturbed or developed and thus within the programmatic analysis for buildout under the 2040 General Plan and Specific Plan as analyzed throughout this EIR. This would reduce the potential for adverse construction impacts associated with construction of new or expanded library facilities associated with implementation of the 2040 General Plan and Specific Plan. Thus, construction impacts related to potential need for new or expanded library facilities would be considered less than significant.

Operation

2040 GENERAL PLAN

The 2040 General Plan would facilitate the addition of approximately 5,151 residents in Millbrae. An increase in population would increase demand for public facilities.

In addition to 2040 General Plan goals and policies already listed in this section, goals and policies from the Land Use Element of the 2040 General Plan support enhancement of Millbrae's existing public facilities and encourage adaptations in the future to meet the City's needs. Relevant goals and policies are listed below.

Goal LU-8 Ensure the adequate provision of civic facilities to serve current and future residents.

- Policy LU-8.1 City Facilities Master Plan. The City shall prepare a City Facilities Master Plan to maintain and plan for the provision of adequate facilities for police, fire, recreation, public works, administrative, community meeting space needs of the City. The City shall consider expansion of City staff offices to the second floor of City Hall, the creation of a corporation yard, a Public Works/Engineering facility that is separate from City Hall, and additional electric vehicle charging stations.
- Policy LU-8.2 Community-Serving Facilities. The City shall ensure adequate provision of community-serving facilities to serve current and future residents, including the Millbrae Library, schools, and other educational institutions, as well as child and senior day care facilities.
- Policy LU-8.3Millbrae Library. The City shall continue to participate in the Joint Powers
Agreement with the County to provide library services at the Millbrae
Library.

- Goal LU-10 Ensure the adequate provision of safe and reliable public infrastructure and facilities to meet the City's current and future needs.
 - Policy LU-10.2 Adequate Municipal Services and Facilities. The City shall continue to ensure that new and existing developments can be adequately served by municipal services and facilities in accordance with City standards.
 - Policy LU-10.3 Development Impact Fees. The City shall regularly evaluate and update development impact fees, including area fees for specific plan areas, to ensure that new development pays its fair share of costs to offset the costs of public capital facilities and infrastructure that is needed to serve new demand created by development projects. This includes, but is not limited to, fees for public safety, libraries, general government facilities, transportation (including both roadway and alternative mode facility improvements), parks and recreation land and facilities, water, sanitary sewer, stormwater drainage, and other required capital facilities and infrastructure.

Goal LU-8 and Policy LU-8.1 would ensure that adequate public facilities, including fire, police, public school, recreation, and library facilities, are planned to support current and future residents of Millbrae. Policy LU-8.3 would continue to ensure that adequate library facilities are provided to the City, and Policies LU-10.1 and LU 10.2 would ensure provision of public infrastructure, services, and facilities through 2040 for current and future residents of Millbrae. Finally, Policy LU-10.3 would require the payment of development impact fees, so that public facilities could be constructed and expanded as the City's population grows. With implementation of the goals and policies included in the 2040 General Plan, impacts related to public facilities, including libraries, associated with development facilitated by the 2040 General Plan would be less than significant.

SPECIFIC PLAN

Implementation of the Specific Plan would facilitate the addition of approximately 5,151 residents in the Specific Plan area. The additional population could increase the demand for public facilities, including libraries, within and proximate to the Specific Plan area

2040 General Plan and Specific Plan goals and policies listed throughout this section would apply; with implementation of the goals and policies included in the 2040 General Plan and Specific Plan, impacts related to public facilities associated with development facilitated by the Specific Plan would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

3.11.5 Cumulative Impacts

The geographic scope of the cumulative public services analysis is the Central County Fire Department (CCFD), the San Mateo County Sheriff's Office (SMCSO), the Millbrae School District (MSD) and San Mateo Union High School District (SMUHSD), and the San Mateo County Libraries

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

service areas. And the geographic scope of the cumulative recreation analysis consists of the local community and regional parks within the boundary of the City of Millbrae and include parks and recreational facilities managed by San Mateo County. Because of differences in the nature of the public service topical areas, they are discussed separately. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Impact Analysis*) located in Millbrae, Burlingame, South San Francisco, and at the San Francisco International Airport in addition to the proposed plans.

Fire Protection Facilities

The CCFD service area consists of the jurisdictional limits of the Cities of Millbrae and Burlingame and the Town of Hillsborough. Cumulative development in Millbrae would result in predominantly residential and commercial development. These types of development would increase the permanent resident and daytime population of the City. The increase in population would result in an increased demand for fire protection facilities. However, the need for fire protection services is gradual as development occurs. To help offset the increased demand, the cumulative plans and projects would be required to pay all applicable review and development impact fees to the CCFD. Cumulative developments would be in compliance with the California Fire Code, Part 9 of the CBC and would follow standards for fire safety such as fire flow requirements for buildings, fire hydrant location and distribution criteria, automated sprinkler systems, and fire-resistant building materials. For these reasons, the cumulative projects would not result in the need to construct new or expand existing fire protection or emergency medical services facilities beyond those anticipated for expected population growth. Therefore, the cumulative impact related to fire protection facilities would be less than significant.

Police Protection Facilities

The SMCSO service area is within the limits of the County of San Mateo and cities which maintain law enforcement services contracts, including the Cities of Millbrae, Half Moon Bay, San Carlos, and Eichler Highlands, and the Towns of Portola Valley and Woodside. Cumulative development in Millbrae would result in predominantly residential and commercial development. These types of development would increase the permanent resident and daytime population. The increase in population and development would result in an increased demand for police protection facilities. Cumulative plans and projects within the service area of the SMCSO would be reviewed for impacts on police protection services, would be required to address any potential impacts with mitigation, and would need to provide adequate emergency access for police services with proper signage and lighting. Because demand for law enforcement services is highly dependent on a number of factors that vary substantially by project (clientele, hours of operation, crime prevention measures, etc.), it is unlikely that there would be substantial overlap in demand that would result such that new facilities are necessary. Therefore, the cumulative impact related to police protection facilities would be less than significant.

School Facilities

The City of Millbrae is served by MSD, which maintains a service area within City limits, and SMUHSD, which serves San Mateo County. Cumulative plans and projects would result in predominantly residential and commercial development. Residential development would increase the permanent population, increasing demand for school facilities. Cumulative plans and projects would add residents to the City. Implementation of the 2040 General Plan and Specific Plan, in

addition to the Millbrae Station Area Specific Plan, South San Francisco 2040 General Plan, and the Burlingame 2040 General Plan would also add residential units to their respective plan areas and would result in an increase in school aged residents. However, the proposed plans would result in incremental contribution to the MSD and SMUHSD student population. Furthermore, cumulative plans and projects would be required to pay development impact fees towards schools. Pursuant to Government Code Section 65995, payment of adopted development fees is considered "full and complete mitigation" for impacts to school facilities, and local governments are prohibited from assessing additional fees or exactions for school impacts. Therefore, the cumulative impact related to school facilities would be less than significant.

Library Facilities

The geographic scope for the cumulative analysis of other public facilities analysis is the service area of the San Mateo County Library system, which includes the existing Millbrae library. Cumulative plans and projects, mainly the residential projects, may also result in the increase in library use. San Mateo County Libraries could need to incrementally increase their library services to the cities of Millbrae, Burlingame, and South San Francisco through the year 2040, which could in turn require the construction of new facilities to accommodate subsequent library visitors and facility space. The proposed plans in conjunction with other cumulative plans and projects listed in Table 3-1 would facilitate development in areas that are currently developed; therefore, construction of new San Mateo County Libraries facilities, if required, would likely occur on property previously disturbed or developed. This would reduce the potential of adverse construction impacts associated with construction of new or expanded library facilities. Therefore, the cumulative impact related to library facilities would be less than significant.

Recreation and Park Facilities

The implementation of the proposed plans in conjunction with the cumulative plans and projects listed in Table 3-1 would result in residential and commercial developments in and near Millbrae. Such cumulative development would be expected to permanently increase residents, which would increase cumulative demand for park facilities. The greater use of parks and recreational facilities in Millbrae could result in physical deterioration of existing parks. However, population growth is only one factor in determining whether parks and recreational facilities would deteriorate through increased use. Other variables include park design, age, infrastructure, and park use. To further offset demand, the cumulative plans and projects would be required to demonstrate compliance with applicable design guidelines established in the proposed 2040 General Plan and Specific Plan. In addition, cumulative development would be subject to parkland dedication requirements or inlieu parkland fees (pursuant to Millbrae Municipal Code Chapter 10.20). Millbrae also continues to retain, enhance, and expand park and recreation facilities throughout the City limits, as well as continues to assess its current and future park needs. With payment of park impact fees by cumulative development, there would be limited potential physical deterioration of existing parks and recreational facilities due to increased use. Therefore, the cumulative impact related to recreational and park facilities would be less than significant.

Overall Level of Cumulative Significance

Less than significant

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3.12 Transportation

3.12.1 Introduction

This section evaluates the potential for the proposed 2040 General Plan and Downtown and El Camino Real Specific Plan project to conflict with existing programs, plans, ordinances, or policies addressing the circulation system; conflict with CEQA Guidelines Section 15064.3(b); increase hazards due to geometric design features; or result in inadequate emergency access. This analysis is primarily based on the findings of the Millbrae 2040 General Plan and Downtown and El Camino Real Specific Plan Transportation Impact Analysis (TIA), which is included as Appendix A to this EIR.

3.12.2 Environmental Setting

Roadway System

There is a natural hierarchy of streets in Millbrae that provide various levels of access and mobility, with regional highways (Highway 101, State Route (SR) 82/El Camino Real, and Interstate 280) accommodating the highest volumes and speeds, major cross-town arterial streets connecting to freeways and operating at moderate speeds and/or volumes, and local access roads that link neighborhoods, parks, and schools to the cross-town streets and to each other, with many of these serving adjacent development and neighborhoods.

Regional Highways

Highway 101, Interstate 280, State Route (SR) 35, and State Route (SR) 82/El Camino Real are the primary routes connecting the City of Millbrae to the region. Figure 3.12-1 presents the location of key regional highways within Millbrae.

GENERAL PLAN AREA

Highway 101 runs along the eastern perimeter of Millbrae and is an eight-lane north-south freeway, augmented by auxiliary and weaving lanes in specific segments, with a full interchange at Millbrae Avenue. Highway 101 carries an annual average daily traffic volume (AADT) of approximately 250,000 in the Millbrae area¹.

Interstate 280 (I-280) runs along the western perimeter of Millbrae and is an eight-lane north-south freeway. Access to I-280 is provided by an interchange at Trousdale Drive, ramps to and from the south at Hillcrest Boulevard, and ramps to and from the north at Larkspur Drive. The AADT in the Millbrae area is approximately 130,000 to 136,000.¹

State Route 35 operates on I-280 through the City of Millbrae. North and south of Millbrae, SR 35 operates on Skyline Boulevard, a north-south arterial road. South of Millbrae, SR 35/Skyline Boulevard is a two-lane road providing access to unincorporated San Mateo and Santa Clara counties, eventually connecting to SR 17. North of Millbrae, SR 35/Skyline Boulevard is a two to four-lane road providing access to the western portions of Daly City and San Francisco, connecting to SR 1 in San Francisco. Skyline Boulevard within Millbrae is not part of SR 35.

¹ Kittelson & Associates, Inc. 2022. Millbrae 2040 General Plan and Downtown and El Camino Real Specific Plan Transportation Impact Analysis (TIA). Included in Appendix A to this EIR.

SPECIFIC PLAN AREA

State Route 82/El Camino Real is a major north-south arterial located west of the Millbrae station that extends from San Francisco to the north to San Jose to the south. El Camino Real is a State highway (State Route 82) under Caltrans jurisdiction. El Camino Real has six to eight travel lanes, a raised median that provides left-turn bays at most intersections, on-street parking, plus a one-lane, one-way southbound frontage road from Taylor Boulevard to Victoria Avenue. The AADT in the Millbrae area is approximately 26,000 to 27,000.¹

Local Access Roads

KEY MILLBRAE EAST-WEST STREETS

Millbrae Avenue is a major east-west arterial that extends from Highway 101 to El Camino Real. West of El Camino Real, Millbrae Avenue continues until its terminus near Vallejo Drive and I-280, and passes through the Specific Plan area. Millbrae Avenue connects residential areas west of Millbrae Avenue to El Camino Real and US 101. Millbrae Avenue crosses over the BART and Caltrain tracks and provides a regional connection to US 101. Millbrae Avenue varies in width from two- to six-lanes, with six lanes and a median that provides left-turn pockets at major intersections near Millbrae Station.

Hillcrest Boulevard is a local east-west collector street that extends from Aviador Avenue to I-280, providing regional connections to I-280 and El Camino Real for the residential areas west of Millbrae. Hillcrest Boulevard has two lanes and on-street parking. Hillcrest Boulevard passes through the Specific Plan area.

KEY MILLBRAE NORTH-SOUTH STREETS

California Drive is a local north-south street that extends south from Millbrae Station to Peninsula Avenue near the city of San Mateo. California Drive has two lanes, left turn pockets at most intersections, and on-street parking. California Drive passes through the General Plan area.

Truck Routes

The City of Millbrae is authorized to restrict commercial vehicles to operate on only a portion of the public roadway system, and to set weight limits or size restrictions. Exceptions include State highways such as Highway 101 and ramps on/off of Highway 101.

Generally, most trucks use arterial roadways to reach commercial areas or industrial areas within Millbrae. The layout of the roadway network generally discourages freight cut-through traffic within the City, and thus most truck trips within the city are for deliveries or pick-ups.

Emergency Vehicle Routes

SAN MATEO COUNTY

The San Mateo County Department of Emergency Management and the San Mateo County Sheriff's Office – Office of Emergency Services coordinates countywide preparedness, response and protection services and activities for large scale incidents and disasters. Within San Mateo County, the main routes into and out of the County that would most likely be used as evacuation routes are US Highway 101, Interstate 280, El Camino Real (State Route 82), and Skyline Boulevard (State Route 35).

GENERAL PLAN AREA

The San Mateo County Sheriff's Office – Office of Emergency Services is responsible for planning, outreach, and training or disaster management and emergency preparedness for the City. The main routes into and out of Millbrae that would most likely be used as evacuation routes are US Highway 101, Interstate 280, and El Camino Real (State Route 82).

SPECIFIC PLAN AREA

The San Mateo County Sheriff's Office – Office of Emergency Services is responsible for planning, outreach, and training or disaster management and emergency preparedness for the City. The main routes into and out of Millbrae that would most likely be used as evacuation routes are US Highway 101, Hillcrest Boulevard, Millbrae Avenue, Interstate 280, Broadway, and El Camino Real (State Route 82).

Pedestrian and Bicycle Facilities

This section describes the existing bicycle and pedestrian network in the 2040 General Plan area. Existing and planned bicycle facilities in Millbrae are shown in the *City of Millbrae Active Transportation Plan*.² Existing and approved major pedestrian connections and major bicycle facilities are presented on Figure 3.12-1.

Pedestrian Facilities

Walking is the fundamental transportation mode of travel for all users of the transportation system, and is the primary mode of travel for 2 to 2.7 percent of residents and employees within in the City.

GENERAL PLAN AREA

Sidewalks are consistently available throughout Millbrae along neighborhood streets and major streets such as El Camino Real, Broadway, and Millbrae Avenue. These major streets have sidewalks on both sides of the street, except for a few sections of Millbrae Avenue between El Camino Real and Old Bayshore Highway. Major intersections have marked crosswalks, and high visibility crosswalks are present at some intersections and are concentrated mainly near schools.¹

In addition to on-street facilities, pedestrians in Millbrae can use the trails shown on Figure 3.12-2. These trails provide off-street connections for both bicyclists and pedestrians. Trails that connect residents to destinations throughout the city include the Spur Trail and the Bay Trail.¹

² City of Millbrae. 2022. City of Millbrae Active Transportation Plan. Adopted October 2021.

https://www.ci.millbrae.ca.us/home/showpublisheddocument/25807/637787902014030000 (accessed March 2022).



Figure 3.12-1 Existing Regional Highways

Source: Millbrae General Plan, November 1998; Map Date February 21, 2018.





SPECIFIC PLAN AREA

The Specific Plan area is accessible by foot and is a key pedestrian destination. In addition to the traditional city street grid, small blocks, and sidewalks, pedestrian amenities include palm trees and other species that provide shade, curb extensions, and thematic banners on light poles, all of which create a sense of place that supports walking. Older residential neighborhoods lie immediately to the west and are within walking distance to the shops and restaurants in downtown.

In 2013, the City installed marked crosswalks, curb extensions (bulb outs), new sidewalks, a bus stop, and landscape enhancements at the signalized intersection of El Camino Real and Victoria Avenue. This signalized crossing provides pedestrians with a safer opportunity to cross El Camino Real when walking to and from the Millbrae Station than the prior uncontrolled crossings, though no pedestrian refuge islands are provided.

As part of the San Mateo County Crosswalk Safety Improvement Project, California Department of Transportation (Caltrans) installed pedestrian crossing enhancements at five intersections along El Camino Real in Millbrae in 2017. The improvements included high visibility crosswalk markings, ADA curb ramps, curb extensions, crosswalk lighting, signs, and pedestrian hybrid beacons, which provide a pedestrian-activated crossing beacon to stop vehicular traffic. Various pedestrian improvements were installed at or along Park Boulevard/San Diego Avenue intersection, Santa Helena Avenue, Ludeman Lane, Taylor Boulevard, and La Cruz Avenue

Crossing El Camino Real is a challenge for pedestrians due to the high volume and high speed of vehicles, particularly during morning and evening commute periods. El Camino Real is an eight-lane highway/regional arterial. Crossing such a wide street can be particularly uncomfortable for pedestrians.

Bicycle Facilities

Four categories of bikeways are specified in the Caltrans Highway Design Manual and Sections 885.1 et seq. of the California Streets and Highways Code³. These categories are:

- Class I Bikeway (Bike Path): Bike paths provide a completely separate right-of-way and are designated for the exclusive use of people riding bicycles and walking with minimal crossflow traffic.
- Class II Bikeway (Bike Lane): Bike lanes provide designated street space for bicyclists, typically adjacent to the outer vehicle travel lanes. Bike lanes include special lane markings, pavement legends, and signage. Bike lanes may be enhanced with painted buffers between vehicle lanes and/or parking, and green paint at conflict zones (such as driveways or intersections).
- Class III Bikeway (Bike Route): Bike routes provide enhanced mixed-traffic conditions for bicyclists through signage, striping, and/or traffic calming treatments, and provide continuity to a bikeway network. Bike routes are typically designated along gaps between bike trails or bike lanes, or along low-volume, low-speed streets. Bicycle boulevards provide further enhancements to bike routes by encouraging slow speeds and discouraging nonlocal vehicle traffic, often through the use of traffic calming. Bicycle boulevards can also feature special wayfinding signage to nearby destinations or other bikeways.

³ California Department of Transportation (Caltrans) 2020. Highway Design Manual. Seventh Edition. December 31, 2020. https://dot.ca.gov/-/media/dot-media/programs/design/documents/hdm-complete-12312020a11y.pdf (accessed March 2022).

 Class IV Bikeway (Separated Bikeway): Separated Bikeways, also referred to as cycle tracks or protected bikeways, are bikeways for the exclusive use of bicycles which are physically separated from vehicle traffic. Separations may include grade separation, flexible posts, physical barriers, or on-street parking.

GENERAL PLAN AREA

The City of Millbrae provides an extensive network of on-street and off-street bicycle facilities. These facilities provide an alternative to driving as well as recreational opportunities for residents and visitors. The General Plan area contains the following bikeways by category.

- Class I Bikeway (Bike Path): The General Plan area contains existing Class I bikeways, such as the Spur Trail, Bay Trail, San Andreas Trail, and Sawyer Camp Trail, and trails within Monterey Linear Park and Central Park.
- Class II Bikeway (Bike Lane): The General Plan area contains existing Class II bikeways along McDonnell Road, Skyline Boulevard, Richmond Drive, Murchison Drive, and Broadway.
- Class III Bikeway (Bike Route): The General Plan area contains existing Class III bikeways along El Camino Real and Magnolia Avenue.
- Class IV Bikeway (Separated Bikeway): There are no Class IV bikeways in the General Plan area.

Only about 1.1 percent of Millbrae employees commute to work via bicycle.¹

SPECIFIC PLAN AREA

There are limited bicycle facilities within the Specific Plan area. The Specific Plan area contains the following bikeways by category.

- Class I Bikeway (Bike Path): There are no Class I bikeways in the Specific Plan area.
- Class II Bikeway (Bike Lane): Broadway includes a short (less than 0.5mile) Class II bikeway.
- **Class III Bikeway (Bike Route):** El Camino Real south of Center Street is a Class III facility, and the extent of Magnolia Avenue in the Specific Plan area is a Class III facility.
- Class IV Bikeway (Separated Bikeway): There are no Class IV bikeways in the Specific Plan area.

Transit Service

Millbrae residents and employees use transit at higher rates than the county averages, which may be due to the presence of the Millbrae Station and high frequency service along El Camino Real Millbrae. Service is provided by three major transit providers: Bay Area Rapid Transit (BART), Caltrain, and the San Mateo County Transit District (SamTrans)¹. BART provides regional heavy rail service, Caltrain provides commuter rail service, and SamTrans provides local and regional bus service. First/last mile shuttles are also provided during commute hours by Caltrain, Peninsula Traffic Congestion Relief Alliance, and private employers. Existing transit lines and stops are shown in Figure 3.12-3.

Bay Area Rapid Transit

BART currently operates over 130 miles of double track rapid rail service, serving 50 stations and over three million people in five densely populated Bay Area Counties: Contra Costa, Alameda, San Francisco, Santa Clara, and San Mateo⁴. As of 2019, BART carries more than 400,000 riders per weekday⁴. The BART-San Francisco International Airport (SFO) extension, completed in June 2003, added 8.7 miles of new track and four new stations, including the Millbrae Station, to the existing system and provides direct service to SFO.

GENERAL PLAN AREA

The Millbrae Station is the southern terminus of two lines. The Richmond-SFO/Millbrae Line provides service to the Millbrae Station during the daytime between approximately 6:00 AM and 8:30 PM on weekdays and from 7:15 AM to 8:15 PM on weekends⁵. The Antioch-SFO/Millbrae Line provides service to the Millbrae Station during the evening between approximately 8:45 PM and 6:00 AM on weekdays and from 7:15 PM to 1:15 AM on weekends. The Millbrae Station provides fast and frequent service (train departures less than 15 minutes on weekdays and 30 minutes on weekends) to many parts of the Bay Area through BART, including downtown San Francisco, downtown Oakland, and SFO. The Millbrae Station is the only BART station that provides a direct intermodal connection to the Caltrain commuter rail system.

SPECIFIC PLAN AREA

There are no BART stations within the Specific Plan area The nearest station is the Millbrae Station, located immediately south of the Specific Plan area.

Caltrain

Caltrain operates 51 miles of commuter rail with 32 stops between San Francisco and San Jose, and limited-service trains to Morgan Hill and Gilroy during weekday commute periods. Caltrain is funded through the Peninsula Corridor Joint Powers Board and managed by SamTrans. On weekdays, Caltrain operates 92 weekday and 68 weekend trains of local, limited stop, and Baby Bullet express service in both directions. Average weekday ridership in 2017 was over 62,000 passengers⁶.

GENERAL PLAN AREA

Caltrain stops at the Millbrae Station between approximately 5:00 AM and 1:00 AM on weekdays, with service intervals of less than 10 minutes during peak rush hour and up to 30 minutes in off-peak hours⁷. Weekend service to Millbrae Station runs from approximately 7:00 AM to 12:00 AM, with service intervals of about one hour.

SPECIFIC PLAN AREA

There are no Caltrain stops within the Specific Plan area.

⁴ BART. 2022a. BART Facts 2022. https://www.bart.gov/sites/default/files/docs/BARTFacts2022.pdf (accessed March 2022).

⁵ BART. 2022b. BART Schedules. Updated February 14, 2022. https://www.bart.gov/schedules/pdfs (accessed March 2022).

⁶ Caltrain. 2017. Caltrain Fast Facts. https://www.caltrain.com/Assets/_Public+Affairs/Fact+Sheets/TA+Fact+Sheet+FY2017.pdf (accessed March 2022).

⁷ Caltrain. 2022. Schedules. https://www.caltrain.com/schedules.html (accessed March 2022).



Figure 3.12-3 Existing Transit Lines and Stops

Source: SamTrans GTFS Data Exchange, Caltrans, Milbrae Bicycle and Pedestrian Transportation Plans, 2009; Map Date June 15, 2022.

San Mateo County Transit District

SamTrans is the primary public transportation provider in San Mateo County. SamTrans manages local and regional bus service, paratransit services, and Caltrain commuter rail. There are over 50 routes in the county that can be categorized as community, express, BART connection, Caltrain connection, and BART and Caltrain connection routes. SamTrans operates 73 bus routes and paratransit service throughout San Mateo County and parts of San Francisco and Palo Alto.

GENERAL PLAN AREA

Route El Camino Real (ECR) is a north-south bus line that provides regional transit service between Daly City and Palo Alto via El Camino Real and services Millbrae every 15 to 30 minutes from approximately 4:00 AM to 12:30 AM on weekdays and weekends⁸. Route 397 is a north-south bus line that provides late night regional transit service between Downtown San Francisco and Palo Alto primarily via El Camino Real and services Millbrae every hour from approximately 12:45 AM to 4:00 AM⁸. Route SFO provides a connection from the Millbrae Station to SFO and services Millbrae from approximately 8:15 AM to 12:00 AM on weekdays and weekends every hour⁸.

SPECIFIC PLAN AREA

Route ECR traverses the Specific Plan area via El Camino Real. Route ECR stops at Trousdale Drive, Linden Avenue, Taylor Avenue, Hillcrest Boulevard, Center Street, Meadow Glen Avenue, and Park Place. Route 397 stops in the Specific Plan area at El Camino Real and Trousdale Drive before stopping at SFO.

Shuttles

Commuter shuttles provide important first/last mile access for commuters to jobs to/from Millbrae Station.

GENERAL PLAN AREA

Sierra Point shuttle, operated jointly by Caltrain, SamTrans, and BART, travels between the Millbrae Station and a large office park located southeast of the City of Brisbane. Broadway-Millbrae Caltrain shuttle travels between the Millbrae and Broadway (in Burlingame) Caltrain stations. North Foster City shuttle, operated by Peninsula Traffic Congestion Relief Alliance, travels between the Millbrae Station and businesses in the North Foster City area. Burlingame-Bayside Alliance shuttle travels between the Millbrae Station and the Burlingame Bayside Area, a series of office buildings located along Bayshore Highway/Airport Boulevard and Rollins Road. North Burlingame Alliance shuttle travels between the Millbrae Station, Mills-Peninsula Health Service, Sisters of Mercy of the Americas, and the Easton-Burlingame neighborhood. Google, Cisco, and Mercy High School shuttles travel between the Millbrae Station and their respective campuses during the AM and PM peak periods.

SPECIFIC PLAN AREA

Shuttles that stop at the Millbrae Station, including Sierra Point shuttle, Broadway-Millbrae Caltrain shuttle, North Foster City shuttle, Burlingame-Bayside Alliance shuttle, North Burlingame Alliance shuttle, and Google, Cisco, and Mercy High School shuttles, operate in the Specific Plan area.

⁸ SamTrans. 2022. Timetables. https://www.samtrans.com/schedulesandmaps/timetables.html (accessed March 2022).

Aviation Facilities

The City of Millbrae is served by SFO. SFO enplaned and deplaned over 16 million passengers in 2020 and facilitated takeoffs of air carriers, regional jets, general aviation propeller aircraft, commuter propeller aircraft, business jets, fixed-wing military aircraft, and both civilian and military helicopters⁹.

General Plan Area

SFO is directly adjacent to the eastern border of the General Plan area. There are no aviation facilities within the General Plan area.

Specific Plan Area

SFO is approximately 0.25-mile from the Specific Plan area. There are no aviation facilities within the Specific Plan area.

3.12.3 Regulatory Framework

Federal Regulations

Americans with Disabilities Act of 1990

The Americans with Disabilities Act (ADA) of 1990 provides comprehensive rights and protections to individuals with disabilities. The goal of the ADA is to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities. To implement this goal, the United States Access Board, an independent Federal agency created in 1973 to ensure accessibility for people with disabilities, has created accessibility guidelines for public rights-of-way. While these guidelines have not been formally adopted, they have been widely followed by jurisdictions and agencies nationwide in the last decade. The guidelines, last revised in July 2011, address various issues, including roadway design practices, slope and terrain issues, pedestrian access to streets, sidewalks, curb ramps, street furnishings, pedestrian signals, parking, and other components of public rights-of-way.

Federal Highway Administration

The FHWA is the agency of the United States Department of Transportation responsible for the federally funded roadway system, including the interstate highway network and portions of the primary State highway network. FHWA funding is provided through the Fixing America's Surface Transportation Act. Federal funds can be used to fund eligible local transportation improvements in such as projects to improve the efficiency of existing roadways, traffic signal coordination, bikeways, pedestrian facilities, and transit system upgrades.

State Regulations

Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law. SB 743 changed the way transportation impact analysis is conducted as part of CEQA compliance. These changes

⁹ SFO. 2020. SFO Fact Sheet Calendar Year 2020. https://www.flysfo.com/sfo-fact-sheet (accessed March 2022).

eliminated automobile delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA.

Prior rules treated automobile delay and congestion as an environmental impact. SB 743 requires the *CEQA Guidelines* to prescribe an analysis that better accounts for transit and reductions of greenhouse gas emissions. In December 2018, Office of Planning and Research (OPR) released the final update to *CEQA Guidelines* consistent with SB 743, which recommends using vehicle miles traveled (VMT) as the most appropriate metric of transportation impact to align local environmental review under CEQA with California's long-term greenhouse gas emissions reduction goals. The *Guidelines* require all jurisdictions in California to use VMT-based thresholds of significance no later than July 1, 2020.

At the same time as the release of the updated *CEQA Guidelines*, OPR also released a non-binding *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which outlines potential VMT analysis methodologies and thresholds of significance for use by agencies in California based on substantial evidence developed by OPR related to achievement of the State's greenhouse gas emissions reductions targets.¹⁰

Senate Bill 32 and Senate Bill 375

On September 8, 2016, the governor signed SB 32 into law, extending the California Global Warming Solutions Act of 2006 by requiring the state to further reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, the CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of recently adopted policies and legislation.

The Sustainable Communities and Climate Protection Act of 2008 (SB 375), signed in August 2008, enhances the state's ability to reach greenhouse gas emissions goals by directing the California Air Resources Board to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations.

Assembly Bill 747 and Senate Bill 99

Assembly Bill (AB) 747 (2019) requires that the safety element be reviewed and updated to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios. This will be a requirement for all safety elements or updates to hazard mitigation plans completed after January of 2022.

SB 99 (2019) requires review and update of the safety element to include information to identify residential developments in hazard areas that do not have at least two emergency evacuation routes. In essence, this legislation assists in identifying neighborhoods and households within a hazard area that have limited accessibility. This is intended to assist the City with identifying opportunities to improve connectivity and evacuation capacity (generally).

¹⁰ OPR. 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf (accessed March 2022).

California Department of Transportation Planning Documents

Caltrans is responsible for planning, designing, constructing, operating, and maintaining the State highway system. Federal highway standards are implemented in California by Caltrans. Any improvements or modifications to the highway system, including ramps and access points, within the study area would need to be approved by Caltrans. The following Caltrans planning documents emphasize the State of California's focus on transportation infrastructure that supports mobility choice through multimodal options, smart growth, and efficient development.

- Smart Mobility 2010: A Call to Action for the New Decade (Smart Mobility Framework)
- Complete Streets Implementation Action Plan
- Strategic Plan 2020-2024
- California Transportation Plan 2050

SMART MOBILITY FRAMEWORK

The purpose of the Smart Mobility Framework, published in February 2010, is to address the State mandate to find solutions to climate change, reduce per capita VMT, and create a safe and equitable transportation system.¹¹ The Smart Mobility Framework includes ten implementing themes to achieve its purpose, including integration into Caltrans and other transportation agencies' policy and practice, collection of data and tools to implement the Smart Mobility Framework, undertaking of major cross-functional initiatives, and integration into local government land use and transportation planning.

COMPLETE STREETS IMPLEMENTATION ACTION PLAN

On September 30, 2008, the California Complete Streets Act of 2008 was signed into law. As of January 2011, AB 1358 requires any substantive revision of the circulation/mobility element of a city or county's general plan to identify how they will safely accommodate the circulation of all users of the roadway including pedestrians, bicyclists, children, seniors, individuals with disabilities, and transit riders, as well as motorists.

CALTRANS DEPUTY DIRECTIVE 64-R1: COMPLETE STREETS - INTEGRATING THE TRANSPORTATION SYSTEM

In 2001, Caltrans adopted Deputy Directive 64; a policy directive related to non-motorized travel throughout the State. In October 2008, Deputy Directive 64 was strengthened to reflect changing priorities and challenges. Deputy Directive 64-R1 states:

The Department views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system. Providing safe mobility for all users, including motorists, bicyclists, pedestrians and transit riders, contributes to the Department's mission/vision: "Improving Mobility across California."

¹¹ Caltrans. 2010. Smart Mobility 2010. February 2010. https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/office-of-smart-mobility-and-climate-change/smf-handbook-062210-a-a11y.pdf (accessed April 2022).

Successful long-term implementation of this directive is intended to result in more options for people to go from one place to another, less traffic congestion and greenhouse gas emissions, more walkable communities (with healthier, more active people), and fewer barriers for older adults, children, and people with disabilities.

DIRECTOR'S POLICY 22: DIRECTOR'S POLICY ON CONTEXT SENSITIVE SOLUTIONS

Director's Policy 22, a policy regarding the use of "Context Sensitive Solutions" on all State highways, was adopted by Caltrans in November of 2001. The policy reads:

The Department uses "Context Sensitive Solutions" as an approach to plan, design, construct, maintain, and operate its transportation system. These solutions use innovative and inclusive approaches that integrate and balance community, aesthetic, historic, and environmental values with transportation safety, maintenance, and performance goals. Context sensitive solutions are reached through a collaborative, interdisciplinary approach involving all stakeholders.

The context of all projects and activities is a key factor in reaching decisions. It is considered for all State transportation and support facilities when defining, developing, and evaluating options. When considering the context, issues such as funding feasibility, maintenance feasibility, traffic demand, impact on alternate routes, impact on safety, and relevant laws, rules, and regulations must be addressed.

The policy recognizes that "in towns and cities across California, the State highway may be the only through street or may function as a local street," that "these communities desire that their main street be an economic, social, and cultural asset as well as provide for the safe and efficient movement of people and goods," and that "communities want transportation projects to provide opportunities for enhanced non-motorized travel and visual quality." The policy acknowledges that addressing these needs will assure that transportation solutions meet more than just traffic and operational objectives.

STRATEGIC PLAN 2020-2024

Caltrans' 2020-2024 Strategic Plan weaved sustainability principles through all of its goals. Goals of the Strategic Plan are related to safety, enhancing and connecting the multimodal transportation network, lead climate action, and advancing equity in all communities.¹²

CALIFORNIA TRANSPORTATION PLAN 2050

Caltrans completed the California Transportation Plan to comply with Title 23, Code of Federal Regulation Section 450.214 and pursuant to California Government Code Title 7 Division 1 Chapter 2.3. The California Transportation Plan provides a roadmap for making effective, equitable, transparent, and transformational transportation decisions in California. The vision of the California Transportation Plan is: "California's safe, resilient, and universally accessible transportation system supports vibrant communities, advances racial and economic justice, and improves public and environmental health," which is supported by goals related to safety, climate, equity, accessibility, public health, economy, environment, and infrastructure.¹³

¹² Caltrans. 2021. Caltrans 2020-2024 Strategic Plan. https://dot.ca.gov/-/media/dot-media/programs/risk-strategic-management/documents/sp-2020-16p-web-a11y.pdf (accessed April 2022).

¹³ Caltrans. 2021. California Transportation Plan 2050. February 2021. https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/ctp-2050-v3-a11y.pdf (accessed April 2022).

California Encroachment Permits

Any work within the existing right of way would have to comply with Caltrans permitting requirements. This includes a traffic control plan that adheres to the standards set forth in the California Manual of Uniform Traffic Control Devices (MUTCD). As part of these requirements, there are provisions for coordination with local emergency services, training for flagmen for emergency vehicles traveling through the work zone, temporary lane separators that have sloping sides to facilitate crossover by emergency vehicles, and vehicle storage and staging areas for emergency vehicles. MUTCD requirements also provide for construction work during off-peak hours and flaggers.

Regional and Local Regulations

Plan Bay Area 2050

MTC is responsible for regional transportation planning in the nine-county San Francisco Bay Area. MTC most recently updated its Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), a federally-mandated 20-year blueprint for the region, in 2021. This RTP/SCS is known as Plan Bay Area 2050. RTPs must be developed in cooperation with State and local stakeholders and provide a clear vision of the regional transportation goals, policies, objectives, and strategies. This vision must be realistic and within fiscal constraints. Responsibility for approving and overseeing improvements to the State highway system rests with Caltrans, while each local jurisdiction (cities and County) is responsible for planning and implementing improvements to the streets within its boundaries.

The RTP/SCS sets forth the following transportation-related goals under the umbrella of Transportation Strategies. Other goals have been established for Housing Strategies, Economic Strategies, and Environmental Strategies. Each Transportation Strategies goal (listed below) has associated supportive strategies to help guide implementation, and performance indicators by which the region can assess its progress.

Goal Maintain and Optimize the Existing System

- T1. Restore, operate and maintain the existing system
- T2. Support community-led transportation enhancements in Equity Priority Communities
- T3. Enable a seamless mobility experience
- T4. Reform regional transit fare policy
- T5. Implement per-mile tolling on congested freeways with transit alternatives
- T6. Improve interchanges and address key highway bottlenecks
- T7. Advance other regional programs and local priorities

Goal Create Healthy and Safe Streets

- T8. Build a Complete Streets network
- T9. Advance regional Vision Zero policy through street design and reduced speeds

Goal Build a Next-Generation Transit Network

- T10. Enhance local transit frequency, capacity and reliability
- T11. Expand and modernize the regional rail network

T12. Build an integrated regional express lanes and express bus network

San Mateo Countywide Transportation Action Plan 2040 (SMTCP)

In 2017, the San Mateo County City/County Association of Governments (C/CAG) Board of Directors adopted the SMCTP 2040 to provide San Mateo County with a long-range, comprehensive transportation plan for identifying and resolving transportation issues. Transportation planning objectives and policies include integration of transportation and land use plans for sustainable commuting with surrounding counties in the Bay Area.¹⁴

San Mateo County Transportation Authority Strategic Plan

The San Mateo County Transportation Authority adopted their 2020-2045 Strategic Plan, which identifies the policies, procedures, and methods for administering the expenditure of funds generated by Measure A and 50 percent of funds generated by Measure W. Measure A, reauthorized in 2004, created a half-cent sales tax and the adopted of a new Transportation Expenditure Plan until 2033. Measure W provides an additional half-cent transportation sales tax for until 2048 to supplement Measure A. The purpose of the Strategic Plan is to provide policy guidance for the implementation of Measure A and Measure W transportation sales tax programs.¹⁵

San Mateo County Comprehensive Bicycle and Pedestrian Plan

The San Mateo County Comprehensive Bicycle and Pedestrian Plan was developed by the San Mateo C/CAG with support from the San Mateo County Transportation Authority to address the planning, design, funding, and implementation of bicycle and pedestrian projects countywide. The following are the relevant goals and policies:

Goal 2 More People Riding and Walking for Transportation and Recreation

Policy 2.6 Serve as a resource to county employers on promotional information and resources related to bicycling and walking.

Goal 4 Complete Streets and Routine Accommodation of Bicyclists and Pedestrians

- **Policy 4.1** Comply with the complete streets policy requirements of Caltrans and the Metropolitan Transportation Commission concerning safe and convenient access for bicyclists and pedestrians, and assist local implementing agencies in meeting their responsibilities under the policy.
- **Policy 4.5** Encourage local agencies to adopt policies, guidelines, standards, and regulations that result in truly bicycle-friendly and pedestrian-friendly land use developments, and provide them technical assistance and support in this area.
- **Policy 4.6** Discourage local agencies from removing, degrading or blocking access to bicycle and pedestrian facilities without providing a safe and convenient alternative.

¹⁴ City/County Association of Governments of San Mateo County. 2017. San Mateo Countywide Transportation Plan. February 2017. https://ccag.ca.gov/wp-content/uploads/2014/05/SMCTP-2040-FINAL_.pdf (accessed April 2022).

¹⁵ San Mateo County Transportation Authority. 2020. Strategic Plan 2020-2024.

https://www.smcta.com/Assets/SMCTA/Programs/Final+Strategic+Plan+2020-2024.pdf (accessed March 2022).

City of Millbrae Active Transportation Plan

The Active Transportation Plan (ATP) is the Citywide bicycle and pedestrian master plan that aims to enhance circulation and connectivity. The ATP was adopted by the City Council on October 12, 2021. The purpose of the ATP is to assess the needs of pedestrians and cyclists in Millbrae; identify improvements to infrastructure and programs; ensure eligibility for certain transportation funding sources; and coordinate pedestrian and bicycle local actions and regional projects. The ATP is written with the vision of a safe, interconnected, and accessible environment for bicyclists, pedestrians, and users of evolving modes of mobility of all ages and abilities. The ATP's vision consists of a network that is complete and provides convenient walking and biking facilities to local and regional destinations and amenities.¹

Millbrae Station Area Specific Plan

The MSASP was updated in 2016 and refined the vision for Millbrae Station that was set out in the original 1998 MSASP and the 1998 General Plan. The 2016 MSASP plans for multimodal and circulation improvements, as well as infrastructure improvements required to accommodate new development^{16.} Land use under the MSASP is envisioned to be primarily Transit-Oriented Development (TOD), which aims to create a compact, walkable, and high-density mixed-use residential and commercial area within one-half mile of a transit station that encourages transit use. Land uses include residential mixed-use, retail center, employment center/light industrial, hotels, public facilities, and multi-family residential overlay.

Broadway and El Camino Real Streetscape Plan

The Broadway and El Camino Real Streetscape Plan (Streetscape Plan) is included as an appendix within the Specific Plan.¹⁷ The Streetscape Plan defines potential changes to the roadway layout and function, including roadway geometry, number of travel lanes, bicycle facilities, transit and multimodal facilities, sidewalk width; and improvements to the design character of the corridors, including pavement materials, furnishings, lighting, planting, wayfinding and public art. Objectives include improvement of pedestrian and bicycle safety, accommodation of multi-modal transit, creation of identifiable character, establishment of a dynamic and varied pedestrian experience, and integration of green infrastructure.

Grand Boulevard Multimodal Transportation Corridor Plan

The 2010 Grand Boulevard Multimodal Transportation Corridor Plan was developed by nineteen cities, including Millbrae, San Mateo and Santa Clara counties, the Valley Transportation Authority, MTC, Caltrans, the San Mateo County Transit District, and other public agencies, to "guide the transformation of El Camino Real into a pedestrian and transit-friendly, high performing multimodal arterial."

Millbrae General Plan

The current Millbrae General Plan contains policies related to transportation, but they would be replaced by the proposed 2040 General Plan.

¹⁶ City of Millbrae. 2021. Millbrae Station Area Specific Plan.

https://www.ci.millbrae.ca.us/home/showpublisheddocument/25505/637723296919900000 (accessed March 2022).

¹⁷ City of Millbrae. 2021. Millbrae Broadway & El Camino Real Streetscape Plan. November 2021.

https://www.ci.millbrae.ca.us/home/showpublisheddocument/25605/637737980467448346 (accessed April 2022).

3.12.4 Impacts and Mitigation Measures

Significance Criteria

The City of Millbrae utilizes the following 2022 CEQA Guidelines Appendix G significance criteria questions related to Transportation.

Would the 2040 General Plan or Specific Plan:

- a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
- b) Conflict or be inconsistent CEQA Guidelines Section 15064.3, subdivision (b)?
- c) Substantially increase traffic-related hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- d) Result in inadequate emergency access?

Approach to Analysis

Vehicles Miles Traveled Approach

Since SB 743 eliminated the use of level of service (LOS) for CEQA impact analysis purposes, that method is not utilized in this analysis. The analysis in this document examines potential roadway transportation impacts under current CEQA criteria. The primary quantitative measure of roadway impacts is VMT.

VMT is determined by multiplying the number of vehicular trips by the trip distance in miles. For example, one vehicle that travels ten miles in a day generates ten VMT. For the purposes of this analysis, VMT is expressed on a daily basis for a typical weekday. VMT values in this analysis represent the full length of a given trip and are not truncated at jurisdiction boundaries. Additionally, these VMT values are for trips beginning or ending in the city (i.e., are associated with land uses within Millbrae). Trips passing through the city without stopping are not included in these VMT estimates, as the city has little or no control over such trips.

Although the absolute amount of VMT may be reported, transportation impact analysis is typically based on VMT expressed as an efficiency metric. VMT efficiency metrics, such as VMT per resident and VMT per employee, allow the VMT performance of different land use quantities to be compared. Such metrics provide a measure of travel efficiency and help depict whether people are traveling by vehicle more or less over time, across different areas, or across different planning scenarios. A per-capita or per-employee decline in VMT compared to a baseline condition indicates that the land use patterns and transportation network are operating more efficiently.

Two measures of VMT are used in this analysis:

- VMT per capita for residential land uses. Includes VMT for all trips produced by a dwelling unit's residents, such as to work, school, or shop, on a typical weekday.
- VMT per employee for non-residential land uses. Includes all trips made by employees at the non-residential land use on a typical weekday, not including visitors to the non-residential land use such as customers, patients or deliveries.

The regional travel demand model maintained by the Santa Clara Valley Transportation Authority (VTA) on behalf of the San Mateo County C/CAG is used to identify the VMT generated by land uses in Millbrae as well as San Mateo County and the entire nine-county Bay Area.

VMT estimates for the 2019 baseline modelled conditions are shown in Table 3.12-1. In addition to the two metrics presented above, total VMT metrics are reported for information. The total VMT includes the residential VMT (trips made by residents to and from their homes) and employee VMT (commute trips made by employees), and also includes VMT from additional trips such as customers at stores, trips between multiple errands, visitors to medical facilities, deliveries, or other non-commute work-related trips.

Units	San Mateo County	Millbrae	
VMT Per Capita			
Population	780,900	23,100	
Residential VMT	12,116,300	348,100	
VMT per Capita	15.5	15.1	
VMT Per Employee			
Employees	383,900	6,700	
Employee VMT	7,452,300	134,100	
VMT per Employee	19.4	20.1	
Total VMT			
Total VMT	32,759,100	841,600	
Source: Kittelson & Associates, 2022			

Table 3.12-1 Demographics and VMT, 2019 Existing Conditions

Travel Demand Model

Forecasts of regional travel by various modes, regional average VMT per capita and VMT per employee values are determined using the C/CAG regional travel model. The travel demand model is a set of mathematical procedures and equations that represent the variety of transportation choices that people make, and how those choices result in trips on the transportation network.

MODEL STEPS

The San Mateo C/CAG regional travel model is a trip-based model that groups land uses into transportation analysis zones (TAZs). The model uses a series of calculation steps to estimate travel associated with the land uses and transportation network.

- Vehicle Ownership: How many vehicles are owned by the households in each TAZ based on incomes and accessibility to transit
- Trip Generation: How many daily trips by trip purpose are generated by each land use in each TAZ
- Trip Distribution: How many trips of each type travel to each other TAZ
- Mode Choice: Which travel modes are used by people of different demographic categories for trips of different purposes between each origin and destination
- Time of Day: Which trips are made during peak hours versus off-peak hours
- Trip Assignment: Which routes are used by each vehicle trip or transit trip

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

The daily activity patterns in the travel model are based on a statistical analysis of a household travel survey, where a representative sample of households were asked to track all daily activities and trips by all members of their household. The travel model was calibrated to these surveyed travel patterns, and also validated by its ability to replicate counted traffic volumes, transit ridership, and total VMT from the Highway Performance Measurement System (HPMS) which is based on traffic counts.

LAND USE AND ANALYSIS SCENARIOS

The C/CAG travel model requires lands uses to be defined for each geographic area in the county. The model defines land uses in TAZs which are typically bounded by major arterial or collector streets and are generally subdivisions of Census tracts. The model land use inputs include numbers of households and employees by employment category, as well as enrollment at schools.

The C/CAG model had defined a 2040 land use forecast based on the Plan Bay Area 2040 Regional Transportation Plan. This forecast was generally consistent with the allowable land uses in the current General Plan, but did not fully account for the 2040 General Plan, Specific Plan, or MSASP. In order to more completely assess the transportation impacts of the proposed plans, a revised future 2040 land use forecast was prepared for this EIR.

The future land use forecasts are consistent with the proposed plans land use maps. City staff provided more specific assumptions for Specific Plan areas. A detailed mapping of parcels and allowable development was compiled to determine the maximum buildout potential of each parcel and planning area. The assumed development densities were then adjusted to provide a "most likely" scenario for General Plan and Specific Plan development. The assumptions for the MSASP conservatively include full buildout of allowable development.

Table 3.12-2 summarizes the assumed 2040 General Plan land uses compared to the 2019 baseline. The scenarios analyzed include existing conditions (2019), existing conditions plus proposed plans conditions (204), and 2019 to 2040 growth conditions. These scenarios were analyzed separately within the Specific Plan area, MSASP area, and the remainder of Millbrae, as well as the City altogether. Multi-family housing is expected to increase at a faster rate than single-family housing, indicating higher density development planned for the Specific Plan areas. Employment within Millbrae is expected to grow at a higher rate than housing (99 percent versus 36 percent), indicating that the future mix of land uses will provide more opportunities for Millbrae residents to work, shop and access services within Millbrae.

Land Use	Specific Plan Area	MSASP Area ¹	Other Millbrae	Total
2019 Existing Condition	ıs			
Housing Units				
Single family	560	150	4,850	5,560
Multi family	690	320	1,730	2,740
Total	1,250	470	6,580	8,300
Employees				
Retail	1,160	220	1,070	2,450
Non-Retail	1,260	1,220	1,750	4,230
Total	2,420	1,440	2,820	6,680

Table 3.12-2 Millbrae General Plan Land Use

Land Use	Specific Plan Area	MSASP Area ¹	Other Millbrae	Total
2040 General Plan				
Housing Units				
Single family	560	150	5,030	5,740
Multi family	1,690	1,760	2,060	5,510
Total	2,250	1,910	6,580	11,250
Employees				
Retail	1,510	1,080	1,170	3,760
Non-Retail	1,640	6,020	1,880	9,540
Total	3,150	7,100	2,820	13,300
2019 to 2040 Growth				
Housing Units				
Single family	0	0	180	180
Multi family	1,000	1,440	330	2,770
Total	1,000	1,440	510	2,950
Employees				
Retail	350	860	100	1,310
Non-Retail	380	4,800	130	5,310
Total	730	5,660	230	6,620

¹ The travel model TAZ containing the Station Area Specific Plan also includes a portion of the neighborhood to the north

Source: Kittelson & Associates, Inc. 2022. Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan TIA.

TRANSPORTATION NETWORKS

The travel model contains representations of transportation networks for all travel modes.

The model road network includes freeways, highways, arterial streets, most collector streets and local streets which provide connectivity between neighborhoods. The roads are coded with information on functional classification, number of through lanes, speed and capacity.

All regular weekday transit routes are coded in the model. Bus routes are assumed to run on the streets and be subject to varying congested conditions on those streets. Rail transit operates on separate facilities and is not affected by road congestion. The model also has a general representation of transit stop locations and park-and-ride access.

Bicycles and pedestrians are assumed to have access to all streets except freeways. Separate nonmotorized paths are represented where required to show additional access not provided by the local street system.

FUTURE TRAVEL TRENDS

The travel model presumes that future background travel options and behaviors remain similar to current conditions and does not explicitly account for potential changes associated with disruptive trends, emerging technologies, and changes in travel preferences. The model also does not assume a significant increase in working at home compared to 2019 baseline conditions. As a result, the travel model is likely to represent a conservative estimate of future amounts of commuting, vehicle use and VMT.

Notice of Preparation Comments Approach

This section also addressed comments received in response to the EIR NOP related to travel demand reduction and multi-modal strategies, VMT assessment, bus travel time and reliability, and bicyclist safety. Millbrae has also received the requests by Caltrans and California High Speed Rail Authority to coordinate with them with regard to complete streets and station modifications. Assessment of VMT, including related to travel demand reduction and multi-modal strategies, impacts is discussed under Impacts TRA-1 and TRA-2. Assessment of roadway design and safety, including for bicyclists, is addressed under Impact TRA-3.

Specific Thresholds of Significance

The City of Millbrae has not adopted quantitative thresholds for the evaluation of VMT, transit facilities, bicycle and pedestrian facilities, design feature hazards, or emergency access. However, the City applies the following qualitative transportation thresholds:

VMT Metrics and Thresholds

The proposed plans were assessed for VMT to comply with SB 743 requirements and CEQA Guideline section 15064.3, subdivision (b). The City of Millbrae does not have published guidelines for VMT analysis for development projects. To determine impact findings for the proposed plans is estimated based on the C/CAG Travel Demand Model.

The following thresholds of significance are used to evaluate potential VMT impacts with implementation of the 2040 General Plan and Specific Plan:

- Residential land uses: 15 percent below the region's average VMT per capita under baseline. For the purpose of this analysis, the applicable region is San Mateo County.
- Office/employment land uses: 15 percent below the region's average VMT per employee under baseline conditions.

Any increase in the VMT per capita or VMT per employee with the proposed plans compared to the respective threshold (15 percent below the applicable baseline) would be considered a significant impact.

Transit Facilities

Generally, a plan/project causes a significant impact to transit facilities and services if an element of it conflicts with existing or planned transit services. The evaluation of transit facilities shall consider if:

- A plan or project creates demand for public transit services above the capacity that is provided, or planned;
- A plan or project or related mitigation disrupts existing transit services or facilities;
- A plan or project or related mitigation conflicts with an existing or planned transit facility; or
- A plan or project or related mitigation conflicts with transit policies adopted by the City of Millbrae or San Mateo County for their respective facilities.

Bicycle and Pedestrian Facilities

The General Plan describes the related policies necessary to ensure that pedestrian and bicycle facilities are safe and effective for City residents. Using the General Plan as a guide, significant impacts to these facilities would occur when a plan or project:

- Creates a hazardous condition that currently does not exist for pedestrians and bicyclists, or otherwise interferes with pedestrian accessibility to the site and adjoining areas; or
- Conflicts with an existing or planned pedestrian or bicycle facility; or
- Conflicts with policies related to bicycle and pedestrian activity adopted by the City.

Design Feature Hazards

The City does not have significance thresholds related to design feature hazards.

Emergency Access

The City does not have significance thresholds related to emergency access. The City Municipal Code adopts the California Fire Code and amends the code to address local conditions. Therefore, this EIR evaluates the proposed plans using the significance threshold provided by the California Fire Code as follows:

- Multiple-family Residential Projects having more than 100 dwelling units should provide two separated and approved fire apparatus access roads.
- Development of one or two-family dwellings where the number of dwelling units exceed 30 units shall be provided with two separate and approved fire apparatus access roads.
- Provide a fire apparatus access road that has a minimum width of 20 feet with turning radii of 25 feet inside and 45 feet outside.

In addition, the following factors determine whether a plan or project has sufficient access for emergency vehicles, including:

- Location of closest fire stations
- Number of access points (both public and emergency access only)
- Width, height, and turning radius of access points
- Width, height, and turning radius of roadways

Impact Evaluation

Consistency with Circulation System Programs

Significance Criterion a: Would the proposed plans conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact TRA-1 IMPLEMENTATION OF THE 2040 GENERAL PLAN AND SPECIFIC PLAN COULD CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

Roadway, Transit, Bicycle, and Pedestrian Facilities

Construction activities related to implementation of the 2040 General Plan and Specific Plan could create potential conflicts with other roadway, transit, bicycle, and pedestrian users, such as construction related activities resulting in lane, bicycle path, or sidewalk closures along the frontages of individual development projects facilitated by the proposed plans, construction vehicles queuing within the public right-of-way waiting entry to the site, construction worker parking in non-designated parking areas, or construction debris on public streets. Construction impacts would be temporary in nature and encroachment permits from Caltrans would be required for facilities under its administration, such as Highway 101, I-280, and SR 82. Most construction under the proposed plans would occur along SR 82 and thus would be subject to Caltrans encroachment permits. However, construction could still occur along local streets, transit routes, bicycle paths, and sidewalks, and Mitigation Measure TRA-1 would be required to reduce impacts. Therefore, with respect to conflicts with circulation system policies related to roadway, transit, bicycle, and pedestrian facilities, construction impacts of the 2040 General Plan and Specific Plan would be less than significant after mitigation.

Operation

2040 GENERAL PLAN

Roadway Facilities

All development facilitated by the project within the 2040 General Plan area would occur under the Specific Plan, which would result in an increased number of residents, employees, and visitors using roadway facilities in the General Plan area. The 2040 General Plan includes policies that would support development consistent with applicable plans, like Plan Bay Area 2050, San Mateo County Comprehensive Bicycle and Pedestrian Plan, and Millbrae Active Transportation Plan. 2040 General Plan policies related to developing intermodal choices and coordinating with regional agencies for transportation demand and consistency with regional plans and funding programs would ensure that there would be no conflicts with the aforementioned applicable plans. Those policies include:

- **Policy M-1.1 Serving All Users.** The City shall develop, or require new development to incorporate into proposed projects, complete streets infrastructure, where applicable, sufficient to provide safe, comfortable, and convenient travel along and across streets to serve all types of travel (including pedestrians, bicyclists, motorists, movers of commercial goods, micromobility, and public transportation), and users (including persons with disabilities, seniors, children, and families).
- **Policy M-1.2 Multimodal Choices.** The City shall promote development of an integrated, multimodal transportation system that offers desirable choices among travel modes including micromobility, pedestrian ways, bikeways, public transportation, and roadways.

- **Policy M-1.4 Accessibility and Connectivity.** The City shall create a more comprehensive multimodal transportation system by identifying and eliminating gaps in roadways, bikeways, and pedestrian networks; increasing transit access in underserved areas; and removing natural and man-made barriers to accessibility and connectivity.
- **Policy M-5.1 Countywide TDM Programs Participation.** The City shall continue to participate in countywide TDM programs to assist employers and employees in reducing the use of single-occupancy vehicles and promoting and incentivizing the use of transit, active transportation (i.e., non-motorized transportation), and carpooling/vanpooling.
- Policy M-5.2 San Mateo County Congestion Management Program. The City, in coordination with the City/County Association of Governments of San Mateo County (C/CAG) as the designated Congestion Management Agency for the County, shall implement the County Congestion Management Program and the Land Use Impact Analysis Program, otherwise known as the Transportation Demand Management (TDM Policy). The TDM Policy establishes project review thresholds, vehicle trip reduction and mode share targets, monitoring and reporting requirements, and TDM measures.
- **Policy M-5.3 Bay Area Commuter Benefits Program.** The City shall continue to support the Bay Area Commuter Benefits Program, to improve air quality, reduce emissions of greenhouse gases and other air pollutants, and to decrease traffic congestion in the Bay Area by encouraging employees to commute by transit, carpooling, biking, and other alternative modes.
- **Policy M-5.4 Car Sharing.** The City shall explore opportunities to partner with car sharing companies to establish designated car sharing spaces and vehicles in the City, and the City shall explore opportunities for car sharing companies to occupy any required parking spaces on private property provided the cars are made available to the general public.
- Policy M-5.5 Electric Transportation Network Company Vehicles. The City shall encourage the use of EV Transportation Network Company Vehicles (TNCs) in the community.
- Policy M-6.1 Agency Coordination. The City shall coordinate with San Francisco International Airport, the High-Speed Rail Authority, Caltrans, the Peninsula Corridor Joint Powers Board, Metropolitan Transportation Commission (MTC), the San Francisco Bay Area Rapid Transit District, the San Mateo County Transit District, the City/County Association of Governments of San Mateo County and other transit providers and transportation agencies, to meet the travel needs of Millbrae residents, workers, and visitors.
- **Policy M-6.2 Transportation and Transit Funding.** The City shall encourage regional agencies to provide adequate funding for local roadway and transit improvements through sales tax initiatives, traffic impact fees, and other measures when necessary.
- **Policy M-6.3 Regional Traffic Impacts.** The City shall require projects to comply with the requirements of the Congestion Management Plan (CMP) (as defined by C/CAG).

Policy M-6.5 Regional Transportation Impact Fee. The City shall consider working with and other jurisdictions to develop a Strategic Plan to identify and fund major regional projects, including adoption of a regional or sub-regional transportation impact fee.

Implementation of the above 2040 General Plan policies would ensure consistency with circulation system policies related to roadway facilities. Therefore, with respect to conflicts with circulation system policies related to roadway facilities, operational impacts of the 2040 General Plan would be less than significant.

Transit Facilities

All proposed development within the 2040 General Plan area would occur under the Specific Plan, which would result in an increased number of residents, employees, and visitors using transit facilities in the General Plan area. The 2040 General Plan includes policies that would support development consistent with applicable plans, like Plan Bay Area 2050, San Mateo County Comprehensive Bicycle and Pedestrian Plan, and Millbrae Active Transportation Plan. 2040 General Plan policies related to developing intermodal choices, improving access to transit, and coordinating with regional agencies for transportation demand and consistency with regional plans and funding programs would ensure that there would be no conflicts with the aforementioned applicable plans. Those policies include:

- **Policy M-1.1 Serving All Users.** The City shall develop, or require new development to incorporate into proposed projects, complete streets infrastructure, where applicable, sufficient to provide safe, comfortable, and convenient travel along and across streets to serve all types of travel (including pedestrians, bicyclists, motorists, movers of commercial goods, micromobility, and public transportation), and users (including persons with disabilities, seniors, children, and families).
- **Policy M-1.2 Multimodal Choices.** The City shall promote development of an integrated, multimodal transportation system that offers desirable choices among travel modes including micromobility, pedestrian ways, bikeways, public transportation, and roadways.
- **Policy M-1.4** Accessibility and Connectivity. The City shall create a more comprehensive multimodal transportation system by identifying and eliminating gaps in roadways, bikeways, and pedestrian networks; increasing transit access in underserved areas; and removing natural and man-made barriers to accessibility and connectivity.
- **Policy M-2.1 Caltrain and BART.** The City shall coordinate with Caltrain and BART to assure the Millbrae Station is well-maintained, has adequate parking, a safe environment, and continues to provide high-quality service.
- Policy M-2.2 California High Speed Rail. The City shall continue to work with and strongly advocate that the California High-Speed Rail Authority plan a high-quality, welldesigned Millbrae-SFO Station that enhances access and services and fully integrates all transit modes serving the Station into a single station and is also coordinated and interconnected with the surrounding environment including development projects. The City will continue to request that a variety of

alternatives are considered, including alternatives that provide the least impact on the community.

- **Policy M-2.3 Bus and Shuttle Service.** The City shall work with SamTrans, other agencies, private companies, and organizations to provide and manage appropriate community-serving transit service and coordination of schedules and services with other transit agencies. Shuttle service should focus on connecting transit, hotels, and employment centers with the City's Downtown.
- Policy M-3.11 Shared Electric Bikes and Scooters. The City shall designate locations for mobility hubs and modify existing city infrastructure to accommodate shared bicycles, electric bikes and scooters that provide last-mile solutions to residents and commuters. Infrastructure enhancements include dedicated off-street parking spaces and on-street corrals to accommodate shared electric bike and scooter parking and prevent conflicts with pedestrians
- **Policy M-5.1 Countywide TDM Programs Participation.** The City shall continue to participate in countywide TDM programs to assist employers and employees in reducing the use of single-occupancy vehicles and promoting and incentivizing the use of transit, active transportation (i.e., non-motorized transportation), and carpooling/vanpooling.
- **Policy M-5.3 Bay Area Commuter Benefits Program.** The City shall continue to support the Bay Area Commuter Benefits Program, to improve air quality, reduce emissions of greenhouse gases and other air pollutants, and to decrease traffic congestion in the Bay Area by encouraging employees to commute by transit, carpooling, biking, and other alternative modes.
- Policy M-6.1 Agency Coordination. The City shall coordinate with San Francisco International Airport, the High-Speed Rail Authority, Caltrans, the Peninsula Corridor Joint Powers Board, Metropolitan Transportation Commission (MTC), the San Francisco Bay Area Rapid Transit District, the San Mateo County Transit District, the City/County Association of Governments of San Mateo County and other transit providers and transportation agencies, to meet the travel needs of Millbrae residents, workers, and visitors.
- **Policy M-6.2 Transportation and Transit Funding.** The City shall encourage regional agencies to provide adequate funding for local roadway and transit improvements through sales tax initiatives, traffic impact fees, and other measures when necessary.

Implementation of the above 2040 General Plan policies would ensure consistency with circulation system policies related to transit facilities. Therefore, with respect to conflicts with circulation system policies related to transit facilities, operational impacts of the 2040 General Plan would be less than significant.

Bicycle Facilities

All proposed development within the 2040 General Plan area would occur under the Specific Plan, which would result in an increased number of residents and employees using bicycle facilities in the General Plan area. The 2040 General Plan includes policies that would support development consistent with applicable plans, like Plan Bay Area 2050, San Mateo County Comprehensive Bicycle and Pedestrian Plan, and Millbrae Active Transportation Plan. 2040 General Plan policies related to

developing intermodal choices, improving bicycle and pedestrian facilities, and coordinating with regional agencies for transportation demand and consistency with regional plans and funding programs would ensure that there would be no conflicts with the aforementioned applicable plans. Those policies include:

- **Policy M-1.1 Serving All Users.** The City shall develop, or require new development to incorporate into proposed projects, complete streets infrastructure, where applicable, sufficient to provide safe, comfortable, and convenient travel along and across streets to serve all types of travel (including pedestrians, bicyclists, motorists, movers of commercial goods, micromobility, and public transportation), and users (including persons with disabilities, seniors, children, and families).
- **Policy M-1.2 Multimodal Choices.** The City shall promote development of an integrated, multimodal transportation system that offers desirable choices among travel modes including micromobility, pedestrian ways, bikeways, public transportation, and roadways.
- **Policy M-1.4 Accessibility and Connectivity.** The City shall create a more comprehensive multimodal transportation system by identifying and eliminating gaps in roadways, bikeways, and pedestrian networks; increasing transit access in underserved areas; and removing natural and man-made barriers to accessibility and connectivity.
- **Policy M-3.1** Active Transportation Plan. The City shall maintain and implement the Active Transportation Plan to enhance the city's bicycle and pedestrian network.
- **Policy M-3.2 Trail Access**. The City shall enhance the system of pathways providing access to the Spur Trail, the Bay Trail, the Bay Area Ridge Trail, the Crystal Springs Regional Trail, and closing gaps in the trail system.
- **Policy M-3.3 Bay Trail.** The City shall support the completion of the Bay Trail in coordination with regional agencies, and the selection of the trail route and implementation of the trail system in an appropriate alignment between Millbrae and South San Francisco.
- Policy M-3.4 Bikeways System. The City shall develop and maintain a safe and logical bikeways system that is coordinated with the countywide system (consistent with the San Mateo County Bicycle and Pedestrian Plan) and the neighboring cities of San Bruno and Burlingame.
- **Policy M-3.5 Bicycle Lanes on El Camino Real.** The City shall explore options for providing separated or buffered bicycle lanes along El Camino Real and developing parallel alternative routes to the El Camino Real route to provide for connectivity for bicyclists of all ages and abilities, consistent with the Active Transportation Plan and Downtown and El Camino Real Specific Plan.
- **Policy M-3.6 Bicycle Safety.** The City shall require bicycle facilities to be upgraded to increase the visibility and protection of bicyclists relative to other roadway users. This includes clearer separation between vehicles and bicyclists, clear delineated markings along principal arterials and at intersections (such as green pavement markings), and bicycle signal detection (using bicycle-oriented loop detectors or push buttons).

- Policy M-3.7 Bicycle and Pedestrian Facilities. The City shall evaluate new commercial, multifamily residential, and mixed-use development projects to ensure that the project provides bicycle and pedestrian facilities approved by the Community Development Department, adjacent to the project site. Improvements could include secure bicycle parking, streetlights, street furniture, landscaping, trash receptacles, pedestrian-scaled lighting fixtures, shade, and public art.
- **Policy M-3.10Safe Routes to Schools.** The City shall coordinate with the school district and parent organizations to support facility construction and new programs, including seeking State and Federal funds, to ensure that Millbrae children can walk or bike to school safely.
- **Policy M-3.11 Shared Electric Bikes and Scooters.** The City shall designate locations for mobility hubs and modify existing city infrastructure to accommodate shared bicycles, electric bikes and scooters that provide last-mile solutions to residents and commuters. Infrastructure enhancements include dedicated off-street parking spaces and on-street corrals to accommodate shared electric bike and scooter parking and prevent conflicts with pedestrians.
- **Policy M-5.1 Countywide TDM Programs Participation.** The City shall continue to participate in countywide TDM programs to assist employers and employees in reducing the use of single-occupancy vehicles and promoting and incentivizing the use of transit, active transportation (i.e., non-motorized transportation), and carpooling/vanpooling.
- **Policy M-5.3 Bay Area Commuter Benefits Program.** The City shall continue to support the Bay Area Commuter Benefits Program, to improve air quality, reduce emissions of greenhouse gases and other air pollutants, and to decrease traffic congestion in the Bay Area by encouraging employees to commute by transit, carpooling, biking, and other alternative modes.

Implementation of the above 2040 General Plan policies would ensure consistency with circulation system policies related to bicycle facilities. Therefore, with respect to conflicts with circulation system policies related to bicycle facilities, operational impacts of the 2040 General Plan would be less than significant.

Pedestrian Facilities

All proposed development within the 2040 General Plan area would occur under the Specific Plan, which would result in an increased number of residents and employees using pedestrian facilities in the General Plan area. The 2040 General Plan includes policies that would support development consistent with applicable plans, like Plan Bay Area 2050, San Mateo County Comprehensive Bicycle and Pedestrian Plan, and Millbrae Active Transportation Plan. 2040 General Plan policies related to developing intermodal choices, improving bicycle and pedestrian facilities, and coordinating with regional agencies for transportation demand and consistency with regional plans and funding programs would ensure that there would be no conflicts with the aforementioned applicable plans. Those policies include:

Policy M-1.1 Serving All Users. The City shall develop, or require new development to incorporate into proposed projects, complete streets infrastructure, where applicable, sufficient to provide safe, comfortable, and convenient travel along

and across streets to serve all types of travel (including pedestrians, bicyclists, motorists, movers of commercial goods, micromobility, and public transportation), and users (including persons with disabilities, seniors, children, and families).

- **Policy M-1.2 Multimodal Choices.** The City shall promote development of an integrated, multimodal transportation system that offers desirable choices among travel modes including micromobility, pedestrian ways, bikeways, public transportation, and roadways.
- **Policy M-1.4 Accessibility and Connectivity.** The City shall create a more comprehensive multimodal transportation system by identifying and eliminating gaps in roadways, bikeways, and pedestrian networks; increasing transit access in underserved areas; and removing natural and man-made barriers to accessibility and connectivity.
- **Policy M-3.1** Active Transportation Plan. The City shall maintain and implement the Active Transportation Plan to enhance the city's bicycle and pedestrian network.
- **Policy M-3.2 Trail Access.** The City shall enhance the system of pathways providing access to the Spur Trail, the Bay Trail, the Bay Area Ridge Trail, the Crystal Springs Regional Trail, and closing gaps in the trail system.
- **Policy M-3.3 Bay Trail.** The City shall support the completion of the Bay Trail in coordination with regional agencies, and the selection of the trail route and implementation of the trail system in an appropriate alignment between Millbrae and South San Francisco.
- **Policy M-3.7 Bicycle and Pedestrian Facilities.** The City shall evaluate new commercial, multifamily residential, and mixed-use development projects to ensure that the project provides bicycle and pedestrian facilities approved by the Community Development Department, adjacent to the project site. Improvements could include secure bicycle parking, streetlights, street furniture, landscaping, trash receptacles, pedestrian-scaled lighting fixtures, shade, and public art.
- Policy M-3.8 Pedestrian Safety at Intersections. The City shall implement the Active Transportation Plan to enhance pedestrian safety with pedestrian countdown displays at signalized intersections, signal timing that minimizes pedestrian wait times and provides adequate crossing times, crosswalks at all approaches, continental and other high-visibility crosswalk striping, corner curb extensions, and perpendicular ADA-standard curb cuts on all corners.
- Policy M-3.9 Sidewalk Width. The City shall implement the Downtown and El Camino Real Specific Plan to expand the sidewalk widths along Broadway and El Camino Real to accommodate outdoor dining, sidewalk furniture, and better pedestrian access to create a more inviting atmosphere
- Policy M-3.10 Safe Routes to Schools. The City shall coordinate with the school district and parent organizations to support facility construction and new programs, including seeking State and Federal funds, to ensure that Millbrae children can walk or bike to school safely.

Policy M-5.1 Countywide TDM Programs Participation. The City shall continue to participate in countywide TDM programs to assist employers and employees in reducing the use of single-occupancy vehicles and promoting and incentivizing the use of transit, active transportation (i.e., non-motorized transportation), and carpooling/vanpooling

Implementation of the above 2040 General Plan policies would ensure consistency with circulation system policies related to pedestrian facilities. Therefore, with respect to conflicts with circulation system policies related to pedestrian facilities, operational impacts of the 2040 General Plan would be less than significant.

SPECIFIC PLAN

Roadway Facilities

Development under the Specific Plan would be fully consistent with local and regional policies for reducing VMT and greenhouse gas emissions as well as improving transportation safety. In particular, the 2040 General Plan policies discussed above related to roadway facilities would apply to development facilitated by the Specific Plan would support local and regional plans, such as those mentioned under *2040 General Plan*. Implementation of the above 2040 Specific Plan policies related to roadway facilities would ensure consistency with circulation system policies related to roadway facilities. Therefore, with respect to conflicts with circulation system policies related to roadway facilities, operational impacts of the Specific Plan would be less than significant.

Transit Facilities

Development facilitated by the Specific Plan would be focused near high-quality transit service (primarily the Millbrae Station). Development under the Specific Plan would be fully consistent with local and regional policies for reducing VMT and greenhouse gas emissions as well as improving transportation safety. In particular, the 2040 General Plan policies discussed above related to transit facilities would apply to development facilitated by the Specific Plan would support local and regional plans, such as those mentioned under *2040 General Plan*. In addition, the following Specific Plan policy would apply:

Policy CP-15 Bus Stops. The City shall work with partner agencies to encourage improvements to bus stops and addition of amenities along El Camino Real (e.g., shelters, trash receptacles, Wi-Fi) that encourage transit use, contribute to sense of place, and improve the public realm.

Implementation of the above Specific Plan policy related to transit facilities would ensure consistency with circulation system policies related to transit facilities. Therefore, with respect to conflicts with circulation system policies related to transit facilities, operational impacts of the Specific Plan would be less than significant.

Bicycle Facilities

Development facilitated by the Specific Plan would implement Complete Streets improvements, which would enhance the safety and attractiveness of bicycle travel. Development under the Specific Plan would be fully consistent with local and regional policies for reducing VMT and greenhouse gas emissions as well as improving transportation safety. In particular, the following

Specific Plan policies related to bicycle facilities would support local and regional plans, such as those mentioned under 2040 General Plan:

- **Policy CP-12** Bicycle Lanes on El Camino Real. The City shall work with Caltrans to add separated bicycle lanes on El Camino Real to increase cyclist safety, enhance connectivity, reduce automobile reliance, and encourage active lifestyle choices
- Policy CP-13 Bicycle Route Alternatives to El Camino Real. The City shall add and maintain bicycle routes along Magnolia Avenue and Hemlock Avenue to provide lower volume and lower speed route alternatives to El Camino Real
- **Policy CP-14 Bicycle Parking.** The City shall require new development to provide safe and secure bicycle parking facilities, such as bike lockers, bike storage rooms at ground level, and bike racks that allow for proper two-point locking.
- **Policy CP-16** Micro-mobility. The City shall provide micro-mobility options such as bike and scooter shares, and design the streetscape and public plazas to accommodate docking stations, bike parking, etc.

Implementation of the above Specific Plan policies related to bicycle facilities would ensure consistency with circulation system policies related to bicycle facilities. Therefore, with respect to conflicts with circulation system policies related to bicycle facilities, operational impacts of the Specific Plan would be less than significant.

Pedestrian Facilities

Development facilitated by the Specific Plan would implement Complete Streets improvements, which would enhance the safety and attractiveness of pedestrian travel. Development under the Specific Plan would be fully consistent with local and regional policies for reducing VMT and greenhouse gas emissions as well as improving transportation safety. In particular, the following Specific Plan policies related to pedestrian facilities would support local and regional plans, such as those mentioned under *2040 General Plan*:

- Policy CP-11 Pedestrian Crossings. The City shall work with Caltrans to implement the Streetscape Plan and improve pedestrian crossings on El Camino Real to increase the predictability and visibility of pedestrians by providing complete sidewalk coverage, signal controlled crosswalks, minimizing the intersection footprint, reducing pedestrian crossing distances, shortening traffic signal cycle lengths, and using high-visibility treatments. These improvements shall focus on the intersection crossings along El Camino Real, and at Millbrae Avenue and the U.S. Highway 101 onramps
- **Policy CP-16** Micro-mobility. The City shall provide micro-mobility options such as bike and scooter shares, and design the streetscape and public plazas to accommodate docking stations, bike parking, etc.
- **Policy CP-17** Widened Sidewalk and Multi-use Curb Lane on El Camino Real. The City shall incorporate elements along El Camino Real that provide multi-use curb lanes which accommodate a variety of curb uses such as on-street parking, ride-share pick-up/drop-off, loading, parklets, micro-mobility docking stations, etc.

- Policy OS-1 Pedestrian-oriented Public Realm. The City shall enhance the public realm to promote an engaging, safe, and comfortable pedestrian experience. Improvements should include the addition of plazas, parklets, outdoor seating, consistent street planting and other landscape elements, wide sidewalks, sidewalk furniture, and public art.
- Policy OS-2 Network of Public Open Spaces. The City shall provide a network of public open spaces, including outdoor plazas, parks, and parklets, that is connected by pedestrian walkways and paths

Implementation of the above Specific Plan policies related to pedestrian facilities would ensure consistency with circulation system policies related to pedestrian facilities. Therefore, with respect to conflicts with circulation system policies related to pedestrian facilities, operational impacts of the Specific Plan would be less than significant.

Mitigation Measures

MITIGATION MEASURE TRA-1 PREPARE AND IMPLEMENT CONSTRUCTION TRAFFIC MANAGEMENT PLANS

Prior to issuance of building permits, the contractor for an individual development project that requires off-site staging, lane closures, or hauling of 50 cubic yards of cut and fill on a local street (i.e., not under Caltrans' jurisdiction) shall prepare a Construction Traffic Management Plan that includes measures such as, but not limited to, the following, as deemed necessary by the City. The approved Construction Traffic Management Plan shall be implemented during construction.

- Provide a temporary traffic signal, if necessary
- Project Staging Plan to maximize on-site storage of materials and equipment
- A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak-hours; lane closure proceedings; signs, cones, and other warning devices for drivers; and designation of construction access routes
- Permitted construction hours
- Location of construction staging
- Identification of parking areas for construction employees, site visitors, and inspectors, including on-site locations
- Provisions for street sweeping to remove construction related debris on public streets

Level of Significance

Less than significant with mitigation

Vehicle Miles of Travel

Significance Criterion b: Would the proposed plans conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impact TRA-2 IMPLEMENTATION OF THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B). IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Construction

Impacts related to CEQA Guidelines Section 15064.3, subdivision (b) are limited to operational impacts. No respective construction impacts would occur because construction is temporary in nature and, while it may marginally generate VMT from construction worker trips or road detours, does not substantially impact regional VMT.

Operation

2040 GENERAL PLAN

Development facilitated by the 2040 General Plan, while limited to the Specific Plan area, would generate new VMT throughout the General Plan area, since new residents would also travel by vehicle outside of the Specific Plan area. VMT statistics were calculated for the Millbrae General Plan area, which includes the entire city limits, and are included in Appendix A. Table 3.12-3 summarizes the existing (2019) VMT, the applicable San Mateo County impacts thresholds, the VMT associated with implementation of the 2040 General Plan, and the difference in VMT across the General Plan area.

Units	San Mateo Countywide 2019	Millbrae 2019	Millbrae 2040 with General Plan	Percent Change
VMT Per Capita				
Population	780,900	23,100	31,000	+34
Residential VMT	12,116,300	348,100	397,100	+14
VMT per Capita	15.5	15.1	12.8	-15
Impact Threshold	13.2	13.2	13.2	
VMT Per Employee				
Employees	383,900	6,700	13,300	+99
Employee VMT	7,452,300	134,100	252,300	+88
VMT per Employee	19.4	20.1	19.0	-5
Impact Threshold	16.5	16.5	16.5	
Total VMT				
Total VMT	32,759,100	841,600	1,257,500	+49

Table 3.12-3	Existing and Potential VMT Evaluation Associated with the 2040 General
Plan	

Impact threshold is 15% below San Mateo County 2019 Baseline value

Source: Kittelson & Associates, 2022

Future conditions in the General Plan area as a result of development facilitated by the 2040 General Plan would result in decreased VMT per capita and VMT per employee in comparison to existing conditions. Citywide residential VMT per capita would decrease by 15 percent, from 15.1 to 12.8, and would drop below the impact threshold of 13.2. Citywide non-residential VMT per employee would decrease by 5 percent, from 20.1 to 19.0, but would remain above the impact threshold of 16.5.

The VMT reductions from existing conditions to buildout year (2040) indicate that future projects, in particular planned mixed-use development, would provide more opportunities for Millbrae residents and employees to access jobs and services within shorter distances. The shorter trip distances reduce VMT by vehicles and also increase the likelihood that trips would be made by non-auto modes such as bicycling and walking. Improved transit service and accessibility to transit also help to reduce VMT even as travel activity increases.

Development facilitated by the 2040 General Plan would result in reductions in VMT per capita and VMT per employee from existing conditions, but VMT per employee would still exceed the impact threshold. Implementing the proposed 2040 General Plan Mobility Element policies listed above under Impact TRA-1 would reduce VMT through promoting accessibility, encouraging non-vehicle transportation modes, and improving access to transit services. Specifically, Policy M-5.1 would encourage the City to actively participate in countywide Transportation Demand Management (TDM) programs for employment-oriented land use development projects. Additional reductions in VMT per employee of more than 13 percent would be required to achieve the impact thresholds. This level of VMT reduction may be possible at some future employment sites in Millbrae through full implementation of TDM measures such as shuttles or transit subsidies.

Even with the 2040 General Plan policies to reduce VMT, it is possible that VMT per employee would still remain above applicable thresholds. Adherence to General Plan Policy M-5.1 and active participation in countywide TDM programs as a condition of approval for employment-oriented land use development projects would not be guaranteed to reduce Citywide non-residential VMT per employee to less than 16.5. Although VMT per capita and employee would be reduced as a result of the 2040 General Plan, which would a beneficial effect, according to OPR guidance on the application of SB 743, a VMT impact is still significant if VMT per capita or employee remains above 15 percent below the existing baseline. Thus, with respect to consistency with CEQA Guidelines Section 15064.3, subdivision (b), the operational VMT impact of the 2040 General Plan would be significant and unavoidable since VMT per employee would be greater than 16.5 in the 2040 General Plan area, and Mitigation Measure TRA-2 would be required. However, due to unknown future conditions at the time of future projects facilitated by the 2040 General Plan and the uncertainty of a TDM program to guarantee a reduction of VMT below thresholds, even with implementation of Mitigation Measure TRA-2, operational VMT impacts of the 2040 General Plan would be significant and unavoidable.

SPECIFIC PLAN

Development facilitated by the Specific Plan would generate new VMT throughout the Specific Plan area. VMT statistics were calculated for the Specific Plan area and are included in Appendix A. Table 3.12-4 summarizes the VMT for existing (2019) conditions, the applicable San Mateo County impacts thresholds, the VMT associated with implementation of the Specific Plan area, and the difference in VMT across the Specific Plan area.

	San Mateo		Specific Plan Area	
Units	Countywide 2019	Millbrae 2019	2040	Percent Change
VMT Per Capita				
Population	780,900	23,100	6,000	Comparison N/A
Residential VMT	12,116,300	348,100	69,000	Comparison N/A
VMT per Capita	15.5	15.1	11.6	-23
Impact Threshold	13.2	13.2	13.2	
VMT Per Employee				
Employees	383,900	6,700	3,200	Comparison N/A
Employee VMT	7,452,300	134,100	56,400	Comparison N/A
VMT per Employee	19.4	20.1	17.9	-11
Impact Threshold	16.5	16.5	16.5	
Total VMT				
Total VMT	32,759,100	841,600	307,200	Comparison N/A

Table 3.12-4	Existing and Potential VMT	associated with the Specific Plan
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Source: Kittelson & Associates, 2022

Future conditions within the Specific Plan area as a result of development facilitated by the Specific Plan would result in decreased VMT per capita and VMT per employee in comparison to existing conditions. The VMT per capita for the Specific Plan area would be 23 percent lower than the citywide average, and would also be below the impact threshold. The VMT per employee for the Specific Plan area would be 11 percent lower than the citywide average, but would also be above the impact threshold.

The reductions from existing conditions to buildout year (2040) indicate that future projects would provide more opportunities for Millbrae residents and employees to access jobs and services within shorter distances, which would reduce per capita and employee VMT.

Development facilitated by the Specific Plan would result in reductions in VMT per capita and VMT per employee from existing conditions, but VMT per employee would still exceed the impact threshold. Implementing the proposed Specific Plan policies listed above under Impact TRA-1 would reduce VMT through promoting mobility and encouraging non-vehicle transportation modes. Additional reductions in VMT per employee of more than 13 percent would be required to achieve the impact thresholds. This level of VMT reduction may be possible at some future employment sites in Millbrae through full implementation of TDM measures such as shuttles or transit subsidies.

Even with the Specific Plan policies to reduce VMT, it is possible that VMT per employee would still remain above applicable thresholds. Adherence to General Plan Policy M-5.1 and active participation in countywide TDM programs as a condition of approval for employment-oriented land use development projects would not be guaranteed to reduce Citywide non-residential VMT per employee to less than 16.5. Although VMT per capita and employee would be reduced as a result of the Specific Plan, which would be a beneficial effect, according to OPR guidance on the application of SB 743, a VMT impact is still significant if VMT per capita or employee remains above 15 percent below the existing baseline. Thus, with respect to consistency with CEQA Guidelines Section 15064.3, subdivision (b), the operational VMT impact of the Specific Plan would be significant and unavoidable since VMT per employee would be greater than 16.5 in the Specific Plan area, and Mitigation Measure TRA-2 would be required. However, due to unknown future conditions at the time of future projects facilitated by the Specific Plan and the uncertainty of a TDM program to

guarantee a reduction of VMT below thresholds, even with implementation of Mitigation Measure TRA-2, operational VMT impacts of the Specific Plan would be significant and unavoidable.

Mitigation Measure

MITIGATION MEASURE TRA-2 PREPARE AND IMPLEMENT A TDM PLAN WITH TDM PROGRAMS

The City shall require preparation and implementation of a project-level TDM Plan with TDM programs for future employment-oriented, land use development projects facilitated by the proposed plans that do not meet VMT screening criteria to be adopted by the City. The screening criteria shall be in concert with those recommended by OPR, including the following:

- Small projects projects consistent with a Sustainable Communities Strategy and local general plan that generate or generate 110 net daily trips per day or less.
- Projects near major transit stops certain projects (residential, retail, office, or a mix of these uses) proposed within one-half (½) mile of an existing major transit stop or an existing stop along a high-quality transit corridor, with the project meeting thresholds to be established by the City for density, excess parking provisions and replacement of affordable housing.
- Projects in low VMT areas residential and office projects that incorporate similar features (i.e., density, mix of uses, transit accessibility) as existing development in areas with low VMT will tend to exhibit similarly low VMT. Low VMT areas are to be identified based on the regional travel model maintained by C/CAG or another methodology to be adopted by the City.

If no screening criteria are met, then the TDM program must be sufficient to reduce VMT below the Countywide non-residential VMT per employee threshold of 16.5.

Level of Significance

Significant and unavoidable

Roadway Design Safety Hazards

Significance Criterion c:	: Would the proposed plans substantially increase hazards due to a			
	geometric design feature (e.g., sharp curves or dangerous intersections) or			
	incompatible use (e.g., farm equipment)?			

Impact TRA-3 IMPLEMENTATION OF THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD NOT SUBSTANTIALLY INCREASE HAZARDS BECAUSE OF A GEOMETRIC DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT). IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

Construction of the proposed plans is anticipated to utilize vacant areas within the plan areas to accommodate storage of large construction vehicles. Such staging areas would reduce the amount of heavy construction vehicles using adjacent roads. During construction, truck deliveries would be expected to use collectors such as El Camino Real and Broadway and would avoid adding additional heavy duty truck traffic on feeder streets and local streets. Furthermore, these truck routes are

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specifically designated to avoid impacts to pedestrian and bicyclists. Thus, because the construction trucks would travel along the designated truck routes, there would not be a conflict with the automobile vehicle, transit, bicycle, and pedestrian design and activity along roadways on and near the plan areas. Therefore, construction impacts related to roadway design safety hazards would be less than significant.

Operation

2040 GENERAL PLAN

All proposed development within the 2040 General Plan area would occur under the Specific Plan, which would result in an increased number of residents using the transportation system in the General Plan area. All transportation circulation design safety analysis under *Specific Plan* below applies to development facilitated by the General Plan. Additionally, the 2040 General Plan contains policies in support of safe circulation by all modes. Specifically, the 2040 General Plan Mobility Element includes policies to provide safe travel along and across streets (Policy M-1.1), improve bicycle safety (Policy M-3.6), enhance pedestrian safety at intersections (M-3.8) and ensure Safe Routes to Schools (Policy M-3.10), which are listed above in further detail under Impact TRA-1. Therefore, with respect to increases of hazards due to design features, the 2040 General Plan would result in a less than significant operational impact.

SPECIFIC PLAN

Development facilitated by the Specific Plan would increase the number of users on Millbrae's transportation system, which could increase transportation circulation design safety hazards associated with future projects in the Specific Plan area. Primary operational vehicular access to and through the Specific Plan area would be provided by existing signalized intersections primarily along El Camino Real and Broadway.

Improvements to the transportation and circulation system in the Specific Plan area and the City more broadly would be implemented over time through buildout year of 2040. Such improvements would be designed and constructed to local, regional, and federal standards, and as such, would not be expected to introduce significant hazardous design features. The City's design and construction standards and specifications, such as those in the adopted California Fire Code, provide for coordinated and standardized development of City facilities, including roadways. The standards apply to, regulate, and guide the design and preparation of plans, and the construction of streets, highways, alleys, drainage, traffic signals, site access, and related public improvements. Projects that would include the development of new streets, circulation improvements, and access points would be reviewed for compliance with safety guidelines and standards as part of the development review process. Safety considerations include maintenance of a substantially clear line of sight at driveways between the driver of a vehicle waiting to enter the through street and the driver of an approaching vehicle. Future projects would be reviewed by the City and required to be consistent with appropriate regulations and design standards set forth by the Specific Plan. Therefore, with respect to increases of hazards due to design features, the Specific Plan would result in a less than significant operational impact.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Emergency Vehicle Access

Significance Criterion d: Would the proposed plans result in inadequate emergency access?

Impact TRA-4 IMPLEMENTATION OF THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD NOT HAVE THE POTENTIAL TO RESULT IN INADEQUATE EMERGENCY ACCESS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction

Impacts related to inadequate emergency access are limited to operational impacts. During future projects construction, two-way travel would be maintained on El Camino Real and Broadway. Should any roadways in the General Plan and Specific Plan areas experience temporary one-way travel restrictions or be closed to travel, there are multiple access routes to these plan areas, and construction detour signage would be provided. No respective construction impacts would occur.

Operation

2040 GENERAL PLAN

All proposed development within the 2040 General Plan area would occur under the Specific Plan, which would result in an increased number of residents using the transportation system in the General Plan area. All analysis under *Specific Plan* below applies to development facilitated by the General Plan, except fire protection services would also be provided by Central County Fire Department Station 38, located in the southwestern area of Millbrae, in addition to Station 37. Additionally, the 2040 General Plan contains Mobility Element policies in support of roadway, including emergency vehicle, accessibility, including Policy M-1.4, included under Impact TRA-1, which calls for accessibility and connectivity, and Policy M-1.7, listed below, to ensure appropriate ingress and egress to neighborhoods.

Policy M-1.7 Neighborhood Access: The City shall require new development projects in residential neighborhoods provide appropriate ingress and egress and discourage through traffic on residential streets.

Additionally, development within the 2040 General Plan area would be required to comply with the California Fire Code, such as providing two separated and approved fire apparatus access roads that have a minimum width of 20 feet with turning radii of 25 feet inside and 45 feet outside. Therefore, 2040 General Plan operational impacts related to emergency access adequacy would be less than significant.

SPECIFIC PLAN

As discussed in Section 3.9, *Land Use/Planning and Population/Housing*, the Specific Plan would result in an increase in population and development. Development facilitated by the Specific Plan would be required to meet all applicable current State and local codes and ordinances related to fire protection, which includes emergency access.

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As mentioned in Section 3.11, *Public Services and Recreation*, development facilitated by the Specific Plan would be adequately served by Central County Fire Department Station No. 37, which is within the Specific Plan area. Further, as mentioned in Section 3.7, *Hazards/Hazardous Materials and Wildfire*, development facilitated by the Specific Plan would not impede emergency access and response. Therefore, development within the Specific Plan area would be adequately served in case of a fire-related emergency. Development facilitated by the Specific Plan would be required to provide adequate accommodation of fire access to structure frontages, multiple access points to development, as well as adequate width, height, and turning radius of roadways and access points, pursuant to California Building Code requirements. Future projects that would not meet required standards and codes would not be allowed to be permitted by the City. Development facilitated by the Specific Plan would be required to comply with City and County standards and requirements and would undergo review by public safety officials as part of the approval process.

Emergency vehicle response times would continue to be reduced over time due to the ability of emergency vehicles to use vehicle preemption technology (where possible) and sirens; this capability would remain regardless of any roadway capacity modification. Roadway segments that would experience a reduction in vehicular roadway capacity, if any, would undergo individual operations analyses to assess the potential impacts to emergency vehicle access, and mitigation measures would be developed as needed to reduce potentially significant impacts to less than significant levels. Additionally, development within the Specific Plan area would be required to comply with the California Fire Code, such as providing two separated and approved fire apparatus access roads that have a minimum width of 20 feet with turning radii of 25 feet inside and 45 feet outside. As such, there would be adequate emergency service and access associated with development facilitated by the Specific Plan. Therefore, Specific Plan operational impacts related to emergency access adequacy would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

3.12.5 Cumulative Impacts

The transportation impact analysis (see Appendix A) prepared for the proposed plans also accounts for future land use for the entire travel model area, which encompasses the geographic nine-county Bay Area as well as Santa Cruz, San Benito, and Monterey Counties. Adjacent development considered part of the cumulative analysis includes the forecasted Metropolitan Transportation Commission (MTC)/Association of Bay Area Governments (ABAG) Plan Bay Area 2040 land uses for the Bay Area (as listed in Table 3-1 [refer to Chapter 3, Environmental Impact Analysis]) and the forecasted Association of Monterey Bay Area Governments (AMBAG) land uses for the Monterey Bay Area.

Vehicle Miles Traveled

OPR provides the following guidance regarding cumulative impacts analysis and VMT:

When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa.

Because the analysis for the proposed plans were based on VMT per capita and VMT per employee, the significant VMT impact finding implies that the proposed plans would also have a cumulatively considerable contribution to a significant cumulative impact. Since project-level significance thresholds were designed to support long-term environmental goals, they inherently also address potential cumulative VMT impacts. As such, VMT would be cumulatively considerable. Therefore, the cumulative impact related to VMT would be significant and unavoidable.

Compatibility with Programs, Plans, Ordinances, and Policies Related to Circulation

Cumulative plans and projects, including the proposed plans, would be required to comply with local regulations and policies. The plans' incremental contribution to cumulative impacts would be less than significant.

Roadway Safety and Emergency Access

Roadways constructed as part of the proposed plans in conjunction with other cumulative plans and projects listed in Table 3-1 would be constructed to meet current Cities of Millbrae, Burlingame, and South San Francisco design standards. Modifications to public rights-of-way would be consistent with appropriate regulations and design standards set forth by the respective city's applicable plans, programs, and policies. Similarly, cumulative development would also be required to comply with the respective city's regulations and policies. Trucks necessary to construct cumulative development would utilize truck routes designated by the respective cities and would not conflict with the automobile traffic and bicycle and pedestrian activity along city streets. If cumulative development would be required by the respective city to mitigate such impacts. In addition, driveways associated with cumulative development would be constructed in compliance with the California Fire Code and other applicable regulations related to roadway safety and emergency access. Therefore, cumulative impacts related to roadway safety and emergency vehicle access would be less than significant.

Overall Level of Cumulative Significance

Significant and unavoidable

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3.13 Utilities and Service Systems

3.13.1 Introduction

This section describes the existing conditions related to utilities and service systems (water, wastewater, stormwater, and solid waste) within the respective utility service areas, which cover the 2040 Millbrae General Plan area and Downtown and El Camino Real Specific Plan area vicinity as well as the relevant regulatory framework. This section also evaluates the impacts related to such utilities and service systems that could result from implementation of the proposed plans. Information in this section is based on information from the San Francisco Public Utilities Commission (SFPUC), Millbrae Urban Water Management Plan, and Millbrae Department of Public Works. Note that electrical power and natural gas area addressed within Section 3.6, Greenhouse Gas Emissions and Energy.

3.13.2 Environmental Setting

Water

Water Source and Supply

SAN FRANCISCO PUBLIC UTILITIES COMMISSION SERVICE AREA

The City of Millbrae obtains 100 percent of its municipal water supply from SFPUC surface water. This water is delivered from the City and County of San Francisco's Regional Water System (RWS), operated by SFPUC. SFPUC is the third largest municipal utility in California, serving 2.7 million residential, commercial, and industrial customers in the Bay Area. Approximately one-third of SFPUC's delivered water goes directly to customers in San Francisco and wholesale through water agencies in Alameda, Santa Clara, and San Mateo counties. The SFPUC sells water to 26 wholesale customers under the terms of a 25-year contract known as the Water Supply Agreement (WSA) between the City and County of San Francisco and wholesale customers in Alameda County, San Mateo County, and Santa Clara County. Since 1970, the SFPUC has supplied approximately 65 percent of the total wholesale customers' demand.

SFPUC's supply is predominantly from the Sierra Nevada, delivered from the Hetch Hetchy Reservoir through the Hetch Hetchy aqueducts, but also includes treated water produced by the SFPUC from its local watersheds and facilities in San Mateo County. Water purchased from the San Francisco Regional Water System is surface water that originates in the Hetch Hetchy Reservoir in Yosemite National Park. Hetch Hetchy water meets all Federal and State criteria for watershed protection, disinfection treatment, bacteriological quality, and operational standards, and has been granted a filtration exemption by the United States Environmental Protection Agency (USEPA) and the California Department of Public Health.

The SFPUC supplies high-quality drinking water from the Tuolumne River watershed and from local reservoirs in the Alameda and Peninsula watersheds. The SFPUC draws an average of 85 percent of its supply from the Tuolumne River watershed, collected in Hetch Hetchy Reservoir in Yosemite National Park¹. This water feeds into an aqueduct system delivering water 167 miles by gravity to Bay Area reservoirs and customers. The remaining 15 percent of the RWS supply is drawn from local

¹ SFPUC. 2021. Urban Water Management Plan for the City and County of San Francisco. https://sfpuc.org/about-us/policies-plans/urbanwater-management-plan. (accessed March 2022).

surface waters in the Alameda and Peninsula watersheds. The split between these resources varies from year to year depending on the water year hydrology and operational circumstances.

GENERAL PLAN AREA

The General Plan areas obtains 100 percent of its municipal water supply from the SFPUC. This water is delivered from the City and County of San Francisco's Regional Water System (RWS), operated by SFPUC. Millbrae has a distribution system that includes 11 pressure zones, six pumps (three each at two stations), five storage tanks, 568 hydrants, and 69.7 miles of water mains. Only four of the storage tanks are in operation and the other tank, out of the 5, is a standby tank.

SPECIFIC PLAN AREA

The Specific Plan area is within Millbrae Pressure Zone #4. Due to the direct connection to the Regional Water System (RWS), tank storage has not yet been developed in this pressure zone.

Water Demand and Use

SAN FRANCISCO PUBLIC UTILITIES COMMISSION SERVICE AREA

Water consumption patterns in the General Plan area is a function of many independent factors including growth, weather conditions, economic conditions, and water conservation efforts. Wholesale demands reached a historic low during the most recent drought and have increased slightly since the end of the drought. The Bay Area Water Supply and Conservation Agency (BAWSCA), of which the City of Millbrae is a member agency, represents the interests of the 24 cities, water districts, a water company, and Stanford University that purchase water on a wholesale basis from SFPUC. The BAWSCA water management objective is to ensure that a reliable, high-quality supply of water is available where and when people within the service area need it. According to BAWSCA 2020 Regional Water Demand and Conservation Projections, water demands within the region are projected to increase 25 percent from 2020 to 2045 after accounting for the effects of the existing plumbing code, future active conservation savings, and climate change.²

As mentioned above, the SFPUC is under a WSA contract with wholesale customers which includes a "Supply Assurance" that the SFPUC will provide 184 mgd to its wholesale customers. The SFPUC has agreed to deliver water to wholesale customers up to the amount of the Supply Assurance, and this agreement is perpetual and survives the expiration of the WSA. As shown in Table 3.13-1, wholesale demands based on contract obligations for the year 2020 were 156.30 mgd and actual purchases totaled 132.1 mgd, approximately 24.2 mgd less than anticipated. For the 2040 horizon year, it is assumed that SFPUC will provide 184 mgd, as determined by the WSA Supply Assurance.

² BAWSCA. 2020. Regional Water Demand and Conservation Projections.

https://bawsca.org/uploads/pdf/BAWSCA_Regional_Water_Demand_and_Conservation%20Projections%20Report_Final.pdf. (accessed March 2022).

Table 3.13-1 SFPUC Wholesale Contractual Obligations

		Actual 2020	Contractual Obligation in mgd	
Wholesale Customer	ISG in mgd ¹	Purchases in mgd ²	2020	2040
Alameda County Water District	13.76	7.76	7.68	13.76
City of Brisbane/Guadalupe Valley Municipal Improvement District	0.98	0.63	0.89	0.98
City of Burlingame	5.23	3.48	4.58	5.23
California Water Service Company	35.68	29.02	30.27	35.68
Coastside County Water District	2.18	0.88	1.33	2.18
City of Daly City	4.29	3.92	3.46	4.29
City of East Palo Alto	1.96	1.57	2.49	1.96
Estero Municipal Improvement District	5.90	4.34	4.23	5.90
City of Hayward	22.08	14.20	20.82	22.08
Town of Hillsborough	4.09	2.57	3.26	4.09
City of Menlo Park	4.46	2.82	4.06	4.46
Mid-Peninsula Water District	3.89	2.66	2.89	3.89
City of Millbrae	3.15	1.90	2.82	3.15
City of Milpitas	9.23	6.06	7.27	9.23
City of Mountain View	13.46	7.60	9.51	13.46
North Coast County Water District	3.84	2.28	2.34	3.84
City of Palo Alto	17.08	9.75	10.51	17.08
Purissima Hills Water District	1.63	1.71	2.13	1.63
City of Redwood City	10.93	8.75	8.74	10.93
City of San Bruno	3.25	0.96	3.20	3.25
Stanford University	3.03	1.43	2.53	3.03
City of Sunnyvale	12.58	9.43	11.44	12.58
Westborough County Water District	1.32	0.87	0.84	1.32
Cordilleras Mutual Water Company	-	0.01	0.01	0.01
City of San Jose	0	4.23	4.50	0
City of Santa Clara	0	3.29	4.50	0

¹ Individual Supply Guarantee (ISG) refers to each wholesale customer's share of the Supply Assurance as defined in the WSA. The Supply Assurance is the 184 mgd maximum annual average metered supply of water dedicated by San Francisco to public use in the wholesale customer service area (not including the Cities of San Jose and Santa Clara). The City of Hayward's ISG is calculated as 184 mgd less the total of permanent customer ISGs (161.92 mgd).

² Actual demands are equivalent to purchases as reported in customer billing data.

³ Purchase requests for RWS supplies as anticipated to be reported in each agency's individual 2020 UWMP if one is to be prepared (estimates are subject to change). Projections were provided to the SFPUC by BAWSCA in January 2021. See each agency's 2020 UWMPs for their most up to date purchase request projections.

Source: SFPUC Urban Water Management Plan for the City and County of San Francisco, Table 4-4.

GENERAL PLAN AREA AND SPECIFIC PLAN AREA

Water consumption patterns in the General Plan and Specific Plan areas are a function of many independent factors, including growth, weather conditions, economic conditions, and water conservation efforts. According to the Bay Area Water Supply & Conservation Agency's 2020 Regional Water Demand and Conservation Projections, water demands within the region are projected to increase 25 percent from 2020 to 2045 after accounting for the effects of the existing plumbing code, future active conservation savings, and climate change.³

Water Infrastructure and Distribution

SAN FRANCISCO PUBLIC UTILITIES COMMISSION SERVICE AREA

The SFPUC manages more than 280 miles of pipelines, 60 miles of tunnels, 11 reservoirs, five pump stations, and two water treatment plants. In 2020, the SFPUC delivered approximately 198 million gallons per day (mgd) of water to its entire water service area, with an additional 2.3 mgd in local groundwater and recycled water provided to customers within the City of San Francisco.

The allocation between wholesale and retail customers is described in the WSA and provides for 184 mgd to wholesale customers, consistent with the Supply Assurance, and 81 mgd to retail customers (customers within the County and City of San Francisco). In the context of this document, normal year RWS supply is defined as the supply that will be used to meet the full demands on the RWS in a normal year. Current and projected normal year RWS supplies for both retail and wholesale customers are shown in Table 3.13-2.

	Actual		Projected			
RWS Supply ¹	2020	2025	2030	2035	2040	2045
Retail Customers ²	66.5	67.2	67.5	68.6	70.5	73.7
Wholesale Customers ³	132.1	146.0	147.9	151.9	156.3	162.8
Total RWS Supplies	198.6	213.2	215.4	220.5	226.8	236.5

Table 3.13-2 Regional Water System Normal Year Supplies

¹ In the context of this document, normal year RWS supply is defined as the supply that will be used to meet the full demands on the RWS in a normal year

² Groundwater and recycled water are assumed to be used before RWS supplies to meet retail demand. However, if these alternative supplies are not available, up to 81 mgd of RWS supply could be used in normal years.

³ Projected Wholesale Customer deliveries are limited to 184 mgd. 184 mgd includes the demands of the Cities of San Jose and Santa Clara, which are supplied on a temporary and interruptible basis, with their total supply not exceeding 9 mgd assuming supply is available.

Source: SFPUC Urban Water Management Plan for the City and County of San Francisco, Table 6-1.

GENERAL PLAN AREA

The General Plan area receives water through five connections to the RWS and distributes it to customers through approximately 76.1 miles of domestic water mains. The water distribution system boundary is coterminous within Millbrae City limits and consists of the following components:

³ BAWSCA. 2020. Regional Water Demand and Conservation Projections.

https://bawsca.org/uploads/pdf/BAWSCA_Regional_Water_Demand_and_Conservation%20Projections%20Report_Final.pdf. (accessed March 2022).

- 450 fire hydrants;
- 1,500 valves (including hydrant and line valves);
- 11 pressure reducing stations;
- 6 water storage tanks (total storage capacity of approximately 2.1 MG);
- 2 water pump stations; and
- 6,611 service connections.

Millbrae's water distribution system is divided into four major pressure zones and is supplied by five turnouts from the SFPUC RWS.

SPECIFIC PLAN AREA

The Specific Plan area is within Millbrae's service area and RWS distribution system. The Specific Plan area is located in Millbrae Pressure Zone 4, which serves the lower elevation areas adjacent to the San Francisco Bay. Zone 4 is supplied by four SFPUC turnouts, located on Murchison Drive, El Camino Real at Victoria Avenue, Magnolia Avenue, and Green Hills Drive. The turnout at El Camino Real and Victoria Avenue has the highest capacity and serves the Specific Plan area from the south. The Specific Plan area is served by pipelines that range from 6-inch diameter to 12-inch diameter, with the majority of the area served by pipelines that are 8-inch diameter and 10-inch diameter.

Water Treatment

SAN FRANCISCO PUBLIC UTILITIES COMMISSION SERVICE AREA

The Hetch Hetchy Reservoir is the largest unfiltered water supply on the West Coast, and one of only a few large unfiltered municipal water supplies in the nation. The water originates from protected wilderness areas in Yosemite National Park and flows down the Tuolumne River to Hetch Hetchy Reservoir. Water from Hetch Hetchy Reservoir is protected in pipes and tunnels as it is conveyed to the Bay Area and requires pH adjustment to control pipeline corrosion and disinfection for bacteria control. Based on the SFPUC's disinfection treatment practice, extensive bacteriological quality monitoring, and high operational standards, the U.S. Environmental Protection Agency (USEPA) and the State Water Resource Control Board (SWRCB) Division of Drinking Water have determined that the Hetch Hetchy water source meets federal and State drinking water quality requirements without the need for filtration.

All water derived from sources other than Hetch Hetchy Reservoir is treated at one of two treatment plants: the Sunol Valley Water Treatment Plant (SVWTP) or the Harry Tracy Water Treatment Plant (HTWTP). The SVWTP primarily treats water from the Alameda System reservoirs and has both a peak capacity and sustainable capacity of 160 mgd. The HTWTP treats water from the Peninsula System reservoirs and has a peak capacity of 180 mgd and a sustainable capacity of 140 mgd. Major upgrades to the SVWTP were completed in 2013 and to the HTWTP in 2015.

GENERAL PLAN AREA

No WTPs are located within the General Plan area. The City of Millbrae receives water from the Hetch Hetchy Reservoir which is the largest unfiltered water supply on the West Coast, and one of only a few large unfiltered municipal water supplies in the nation. All water derived from sources other than Hetch Hetchy Reservoir is treated at one of two treatment plants: the Sunol Valley Water Treatment Plant (SVWTP) or the Harry Tracy Water Treatment Plant (HTWTP). The SVWTP primarily

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treats water from the Alameda System reservoirs and has both a peak capacity and sustainable capacity of 160 mgd. The HTWTP treats water from the Peninsula System reservoirs and has a peak capacity of 180 mgd and a sustainable capacity of 140 mgd. Major upgrades to the SVWTP were completed in 2013 and to the HTWTP in 2015.

SPECIFIC PLAN AREA

No WTPs are located within the Specific Plan area. The Specific Plan Area uses water that is treated by either the SVWTP or HTWTP.

Wastewater

Wastewater Generation

MILLBRAE PUBLIC WORKS SERVICE AREA

The City of Millbrae is responsible for the collection, treatment, and disposal of wastewater within the City's service area boundary. Millbrae's cumulative wastewater system consists of a dedicated sanitary sewer system, a Waste Pollution Control Plant (WPCP), and a force main discharge outlet to San Francisco Bay.

GENERAL PLAN AREA

The Millbrae WPCP is a secondary treatment facility with a design flow capacity of 3 MGD. The peak wet weather flow for the plant is approximately 9 MGD. According to the Millbrae UWMP, in 2020 the facility metered a total inflow volume of 529 MG, which is an annual average inflow of approximately 1.45 MGD⁴. Millbrae is allowed to discharge up to an annual average of 3 MGD under the discharge requirements outlined by the Regional Water Quality Control Board's Order No. R2-2019-0009 and NPDES Permit No. CA0037532. This order was adopted by the Regional Board in March of 2019 and will expire on April 30, 2024. According to the Millbrae UWMP, the total effluent being discharged through the force main into San Francisco Bay is 548 MG, which is an annual average of 1.50 MGD.⁵

SPECIFIC PLAN AREA

The existing average dry weather sewer flows within the Specific Plan Area are based on 2011 water consumption records and 2011 flow monitoring data, per the 2012 Capacity Assurance Report. In the Specific Plan Area, the existing average dry weather sewer flow is estimated to be 0.47 mgd, including the Pipeline Projects which are approved development projects and development projects that have been submitted for City review at the time of the issuance of the Notice of Preparation for the EIR (December 3, 2021)⁶.

⁴ Millbrae, City of. 2020. Millbrae Urban Water Management Plan. https://www.ci.millbrae.ca.us/departments-services/publicworks/water-conservation/millbrae-2020-urban-water-management-plan. (accessed March 2022

⁵ Millbrae, City of. 2020. Millbrae Urban Water Management Plan. https://www.ci.millbrae.ca.us/departments-services/publicworks/water-conservation/millbrae-2020-urban-water-management-plan. (accessed March 2022

⁶ Millbrae, City of. 2022. Millbrae Downtown and El Camino Real Specific Plan – Appendix Item B.

https://www.ci.millbrae.ca.us/home/showpublisheddocument/26300/637909858885600000. (accessed July 2022).

Wastewater Infrastructure and Collection

MILLBRAE PUBLIC WORKS SERVICE AREA

The Department of Public Works, Operations and Maintenance Division, is responsible for inspecting, maintaining and repairing the sanitary sewer collection system, and responding to customer emergency service requests.

Wastewater is conveyed through a network of approximately 57 miles of sanitary sewer lines, which are primarily under gravity flow conditions and supplemented by three pumping stations and force mains that flow to the WPCP for treatment. The plant is located on the eastern edge of the City limits, adjacent to Highway 101 and near San Francisco Bay. The City also operates three sanitary sewer pumping stations. The WPCP is designed for a dry-weather operation of 3 million gallons per day (MGD), with a wet-weather peak capacity of 9 MGD⁷. The City disposes of its treated effluent through a force main into San Francisco Bay.

Operation of the collection system is subject to the SWRCB's General Waste Discharge Requirement (Order No. 2006-0003) to reduce sanitary sewer overflows (SSOs) by requiring all feasible steps to control the volume of waste discharged into the system, to prevent sanitary sewer waste from entering the storm sewer system, and to develop a Sewer System Management Plan (SSMP). The City of Millbrae updated their SSMP in 2018 which seeks to provide a plan and schedule to properly manage, operate, and maintain all parts of the City's sanitary sewer system.

The City is in the process of upgrading the capacity in its sanitary sewer collection system. Effective November 15, 2010, the City entered into a Consent Decree with San Francisco Baykeeper, the purpose of which is to reduce sanitary sewer overflows (SSOs) in the City's sanitary sewer collection system and to enhance compliance with the applicable permits, laws, and regulations as related to sanitary sewer overflows. In compliance with the Consent Decree, the City is working to reduce the risk of SSOs occurring in its collection system in three ways:

- Comprehensively inspecting the collection system to identify and correct defects;
- Enhancing collection system preventative maintenance activities; and
- Providing hydraulic capacity to convey and treat Peak Wet Weather Flow (PWWF)

GENERAL PLAN AREA

The City of Millbrae owns 55 miles of gravity sewer pipe and also owns and maintains 22 miles of publicly owned sewer laterals. The City owns and operates three pump stations and associated force mains. Recently, the City invested in considerable upgrades to both the collection system and WPCP for wastewater. The collection system is adequately sized for an average dry weather flow of up to 2.2 MGD and a peak wet weather flow of approximately 9.0 MGD, which is limited by the WPCP.

SPECIFIC PLAN AREA

The Specific Plan Area is served by the Millbrae wastewater treatment infrastructure and WPCP.

⁷ Millbrae, City of. 2020. 2021 Urban Water Management Plan. https://www.ci.millbrae.ca.us/departments-services/public-works/waterconservation/millbrae-2020-urban-water-management-plan. (accessed March 2022).

Wastewater Treatment

MILLBRAE PUBLIC WORKS SERVICE AREA

The City of Millbrae operates a Water Pollution Control Plant (WPCP), which treats wastewater generated in Millbrae.

GENERAL PLAN AREA AND SPECIFIC PLAN AREA

The City of Millbrae operates a Water Pollution Control Plant (WPCP), which treats wastewater generated in the General Plan and Specific Plan areas. Wastewater is conveyed through a network of approximately 57 miles of sanitary sewer lines, which are primarily under gravity flow conditions and supplemented by three pumping stations and force mains that flow to the WPCP for treatment. The plant is located on the eastern edge of the City limits, adjacent to Highway 101 and near San Francisco Bay. The City also operates three sanitary sewer pumping stations. The WPCP is designed for a dry-weather operation of 3 million gallons per day (MGD), with a wet-weather peak capacity of 9 MGD⁸. The City disposes of its treated effluent through a force main into San Francisco Bay.

Stormwater

Stormwater Infrastructure and Collection

MILLBRAE PUBLIC WORKS SERVICE AREA

The City of Millbrae Public Works Department owns and maintains the public storm drain system, which includes all of the storm drains, pipes, catch basins, and manholes within the City right-of-way. The City's drainage system consists of a network of 21 miles of storm drains, 3 pump stations, and approximately three miles of open creeks and ditches that route storm runoff through the City to the Bay⁹. The City is divided into the following watersheds:

- Northern Lomita Canal Watershed (225 acres) This watershed drains the northern part of the City through a piped storm drain system (42-inch to 48-inch diameter) into Lomita Creek and the Lomita Canal. The runoff from this watershed is lifted by the Airport Pump Station into the Highline Canal east of the Bay Area Rapid Transit (BART) tracks.
- Southern Lomita Canal Watershed (164 acres) This watershed drains through a piped storm drain system, which in turn flows into the Lomita Creek, which in turn flows into the Lomita Canal at the Landing Lane Bowl. The runoff from this watershed is lifted by the Airport Pump Station into the Highline Canal east of the BART tracks.
- Central Millbrae Watershed (942 acres) This watershed drains through several storm drainage systems to the Highline Canal. Water from the Bay is prevented from entering the Highline Canal by twin box culverts (near South McDonnell Road), each 15 feet wide by 15 feet tall, each with a large flap gate. Flap gates allow water to flow from the City to the Bay, but prevent back flow from the Bay to the City. However, these flap gates sometimes do not close completely because mud accumulates below the gates and prevents the gates from sealing closed. This watershed also includes the Hillcrest Pump Station (Photograph 1-3), which lifts water from the Hillcrest Drive undercrossing under the BART tracks.

⁸ Millbrae, City of. 2020. Millbrae Urban Water Management Plan. https://www.ci.millbrae.ca.us/departments-services/publicworks/water-conservation/millbrae-2020-urban-water-management-plan. (accessed March 2022).

⁹ Millbrae, City of. 2018. City of Millbrae Storm Drain Master Plan. https://www.ci.millbrae.ca.us/departments-services/public-works/administration-engineering/storm-drain-master-plan. (accessed March 2022).

- Millbrae Station Area Specific Plan (MSASP) Watershed (67 acres) This watershed drains through a piped storm drain system to the open channels in the US-101 interchange and then flows into a storm drain to the Cowan Pump Station.
- Murchison Drive Watershed (430 acres) This watershed drains through series of storm drains and Millbrae Creek to the El Portal Canal. The El Portal Canal drains to the Bay. Water from the Bay is blocked from entering the El Portal Canal by twin 84-inch diameter culverts (under the Old Bayshore Highway), each with a flap gate.
- Mills Estates Watershed (130 acres) This watershed drains through a 45-inch storm drain into a City of Burlingame storm drain system. The runoff from this watershed flows to the Cowan Pump Station, where it is lifted by the Cowan Pump Station into the El Portal Canal.

The City's stormwater generally drains east/southeast out of the hills into the flatter regions of the City and, ultimately, out to the Bay south of the Airport. Much of the City is developed, with parks, schools, and steep hillsides representing much of the pervious area. Impervious surfaces prevent runoff from infiltrating into the soil, and thus generate more runoff. Because of this, there are several known flooding problems within the City. To address the issue, the City of Millbrae Storm Drain Master Plan¹⁰ (SDMP) was developed in 2018 to identify improvements needed to eliminate or reduce flooding across key areas within the City.

GENERAL PLAN AREA

The stormwater infrastructure and collection system within the General Plan Area is comprised of a network of 21 miles of storm drains, 3 pump stations, and approximately three miles of open creeks and ditches that route storm runoff through the City to the Bay¹¹.

SPECIFIC PLAN AREA

According to current Federal Emergency Management Association (FEMA) FIRMs (Flood Insurance Rate Maps)¹², the 100-year event zone is contained within the Specific Plan Area. The stormwater infrastructure and collection system within the Specific Plan Area is comprised of a network of 12-inch diameter to 15-inch diameter pipes that carry stormwater to larger trunk lines or directly discharge into adjacent canals.

Telecommunications

Telecommunication services include telephone service (both landlines and mobile service) and internet service for businesses and homes.

Telecommunications Demand

CITY OF MILLBRAE, GENERAL PLAN AREA, AND SPECIFIC PLAN AREA

City of Millbrae telecommunications demand is met by Xfinity and AT&T within both the General Plan area and Specific Plan area.

¹⁰ Millbrae, City of. 2018. City of Millbrae Storm Drain Master Plan. https://www.ci.millbrae.ca.us/departments-services/publicworks/administration-engineering/storm-drain-master-plan. (accessed March 2022).

¹¹ Millbrae, City of. 2018. City of Millbrae Storm Drain Master Plan. https://www.ci.millbrae.ca.us/departments-services/publicworks/administration-engineering/storm-drain-master-plan. (accessed March 2022).

¹² FEMA. https://msc.fema.gov/portal/home. (accessed March 2022).

Telecommunications Infrastructure and Distribution

CITY OF MILLBRAE, GENERAL PLAN AREA, AND SPECIFIC PLAN AREA

Telecommunications infrastructure includes underground optical fibers, cell towers, and standard phone equipment and internet routers. Telecommunications providers own and operate infrastructure, such as cellphone towers and fiber optic cables, within the City of Millbrae, including the General Plan area and Specific Plan area.

Solid Waste

Solid Waste Collection

SOUTH SAN FRANCISCO SCAVENGER COMPANY SERVICE AREA

Millbrae has an exclusive franchise with South San Francisco Scavenger Company (SSFSC). SSFSC's service area includes the cities of Millbrae, Brisbane, South San Francisco, and the San Francisco International Airport. SSFSC regularly collects non-recyclable garbage at the curb side once a week, although users can request collection up to five times a week. Residents can choose between 20-gallon, 32-gallon, or 64-gallon garbage containers. Businesses can choose between a variety of cart sizes and one- to six- yard containers.

GENERAL PLAN AREA

The City of Millbrae has an exclusive Franchise Agreement with the South San Francisco Scavenger Company for debris box/recycling/dumpster/roll-off bin services that requires that they are rented from the South San Francisco Scavenger Company. The one exception is that California State licensed demolition or construction contractors are allowed to self-haul their own garbage and recyclables only if they use their own vehicles, equipment and employees to perform the self-hauling, and as long as such hauling is incidental to their primary business function, e.g., roofer, plumber, etc.¹³ Weekly curbside collection of residential recyclables in Millbrae is also provided by the South San Francisco Scavenger Company. Single stream recycling, which is provided to the City, allows residents to place cans, bottles, paper, plastics, etc. in the same receptacle. No sorting of materials is required by the resident. South San Francisco Scavenger Company employees process the recyclables at Blue Line Transfer Station.

SPECIFIC PLAN AREA

South San Francisco Scavenger Company provides solid waste and residential recycling collection services for the Specific Plan area.

Solid Waste Disposal

SOUTH SAN FRANCISCO SCAVENGER COMPANY SERVICE AREA

Millbrae's solid waste is processed at a transfer station at Blue Line Transfer Station at 500 East Jamie Court in South San Francisco, and from there is transported primarily to the Corinda Los Trancos Landfill (also known as Ox Mountain Sanitary Landfill) in Half Moon Bay. According to the California Department of Resources Recycling and Recovery (CalRecycle), the Corinda Los Trancos Landfill has a remaining capacity of approximately 22,180,000 cubic yards and anticipated closure

¹³ Millbrae, City of. 2022. Recycling & Waste Prevention Program. https://www.ci.millbrae.ca.us/departments-services/publicworks/recycling-waste-prevention-program. (accessed March 2022).

date of 1/1/2034.¹⁴ Municipal solid waste comes from primarily the Bay Area region, but also from more distant municipalities and cities. Table 3.13-3 shows the estimated remaining capacity and anticipated closure date of the Corinda Los Trancos Landfill. CalRecycle reports that in 2019 a total of 12,386 tons of solid waste from Millbrae was disposed at 15 different landfills. Over 96 percent (11,976 tons) of Millbrae's solid waste generated in 2019 went to the Corinda Los Trancos Landfill, in Half Moon Bay, California.¹⁵

Landfill Facility	Permitted Capacity (cubic yards)	Remaining Capacity (cubic yards)	Anticipated Closure Date
Corinda Los Trancos Landfill ¹⁶	60,500,000	22,180,000	2034
Source: Cal Recycle			

GENERAL PLAN AREA

Millbrae's solid waste is primarily transported to the Corinda Los Trancos Landfill in Half Moon Bay. According to CalRecycle, the Corinda Los Trancos Landfill has a remaining capacity of approximately 22,180,000 cubic yards and anticipated closure date of January 1, 2034¹⁷. Over 96 percent (11,976 tons) of Millbrae's solid waste generated in 2019 went to the Corinda Los Trancos Landfill, in Half Moon Bay.¹⁸

SPECIFIC PLAN AREA

Solid waste from the Specific Plan area would be transferred primarily to the Corinda Los Trancos Landfill.

3.13.3 Regulatory Framework

Federal Regulations

CLEAN WATER ACT

The federal Clean Water Act, enacted by Congress in 1972 and amended several times since, is the primary federal law regulating water quality in the United States and forms the basis for several State and local laws throughout the country. The Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the U.S. Environmental Protection Agency the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered

¹⁴ CalRecycle. 2019 SWIS Facility/Site Activity Details Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002).

https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223. (accessed March 2022).

¹⁵ CalRecycle. 2020. Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility.

https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility. (accessed March 2022).

¹⁶ CalRecycle. 2019 SWIS Facility/Site Activity Details Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002).

https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223. (accessed March 2022).

¹⁷ CalRecycle. 2019 SWIS Facility/Site Activity Details Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223. (accessed March 2022).

¹⁸ CalRecycle. 2020. Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility.

https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility. (accessed March 2022).

by the U.S. Environmental Protection Agency and U.S. Army Corps of Engineers. At the State and regional levels in California, the act is administered and enforced by the SWRCB and the nine Regional Water Quality Control Boards (RWQCBs).

CLEAN WATER ACT SECTION 402

Section 402 of the Clean Water Act requires that all construction sites on an acre or greater of land, as well as municipal, industrial and commercial facilities discharging wastewater or stormwater directly from a point source, such as a pipe, ditch, or channel, into a surface water of the United States must obtain permission under the NPDES permit. All NPDES permits are written to ensure that the surface water receiving discharges will achieve specified water quality standards.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

The NPDES permit program was established in the CWA to regulate municipal and industrial discharges to surface waters of the United States. Federal NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable concentrations and/or mass emissions of pollutants contained in the discharge; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities. Wastewater discharge is regulated under the NPDES permit program for direct discharges into receiving waters and by the National Pretreatment Program for indirect discharges to a sewage treatment plant.

TITLE 40 OF THE CODE OF FEDERAL REGULATIONS

Title 40 of the Code of Federal Regulations (CFR), Part 258 (Resource Conservation and Recovery Act RCRA, Subtitle D) contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design, groundwater monitoring, and closure of landfills.

State Regulations

CALIFORNIA SUSTAINABLE GROUNDWATER MANAGEMENT ACT

In September 2014, Governor Brown signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins.

CALIFORNIA SENATE BILLS 610 AND 221 (WATER SUPPLY ASSESSMENT AND VERIFICATION)

Senate Bills (SB) 610 and 221 amended State law, effective January 1, 2002, to improve the link between the information on water supply availability and certain land use decisions made by cities and counties. Both statutes require detailed information regarding water availability to be provided to city and county decision-makers prior to approval of specified large development projects with greater than 500 dwelling units or 500,000 square feet of commercial space. Both statutes also require this detailed information to be included in the administrative record that serves as the

evidentiary basis for an approval action by the city or county on such projects. Under SB 610 water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects as defined in Water Code 10912 subject to CEQA. Under SB 221 approval by a city or county of certain residential subdivisions requires an affirmative written verification of sufficient water supply.

CALIFORNIA WATER PLAN

The California Department of Water Resources is responsible for preparing and updating the California Water Plan, which is a policy document that guides the development and management of State water resources. The plan is updated every five years to reflect changes in resources and urban, agricultural, and environmental water demands. The California Water Plan suggests ways of managing demand and augmenting supply to balance water supply with demand.

CALIFORNIA URBAN WATER MANAGEMENT PLANNING ACT

In 1983 the California Legislature enacted the Urban Water Management Planning Act (Water Code Section 10610–10656). The Act states that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 acre-feet annually, should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The Act requires that urban water suppliers adopt an urban water management plan at least once every five years and submit them to the Department of Water Resources. Noncompliant urban water suppliers are ineligible to receive funding pursuant to Division 24, commencing with Section 78500, or Division 26, commencing with Section 79000, or receive drought assistance from the State until the UWMP is submitted and deemed complete pursuant to the Urban Water Management Planning Act.

CALIFORNIA SENATE BILL 7x7 (STATEWIDE WATER CONSERVATION)

In November 2009 the California State Legislature passed and the Governor approved a comprehensive package of water legislation, including SB 7x7 addressing water conservation. In general SB 7x7 requires a 20 percent reduction in per capita urban water use by 2020, with an interim 10 percent target in 2015. The legislation requires urban water users to develop consistent water use targets and to use those targets in their UWMPs.

PORTER-COLOGNE WATER QUALITY CONTROL ACT (CALIFORNIA WATER CODE)

The State of California is authorized to administer Federal or State laws regulating water pollution within the State. The Porter-Cologne Water Quality Control Act (Water Code Section 13000, *et seq*.) includes provisions to address requirements of the Clean Water Act. These provisions include National Pollutant Discharge Elimination System (NPDES) permitting, dredge and fill programs, and civil and administrative penalties. The Porter-Cologne Act is broad in scope and addresses issues relating to the conservation, control, and utilization of the water resources of the State. Additionally, the Porter-Cologne Act states that the quality of all the waters of the State, including groundwater and surface water, must be protected for the use and enjoyment by the people of the State.

In California, the NPDES program is administered by the SWRCB through the Regional Water Quality Control Boards (RWQCB) and requires municipalities to obtain permits that outline programs and activities to control wastewater and stormwater pollution. The federal Clean Water Act prohibits discharges of stormwater from construction projects unless the discharge is in compliance with an

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

NPDES permit. The SWRCB is the permitting authority in California, and adopted an NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, otherwise known as the Construction General Permit (Order 2009-0009, as amended by Orders 2010-0014-DWQ and 2012-006-DWQ). The Order applies to construction sites that include one or more acre of soil disturbance. Construction activities include clearing, grading, grubbing, excavation, stockpiling, and reconstruction of existing facilities involving removal or replacement. The Construction General Permit requires that the landowner and/or contractor file permit registration documents prior to commencing construction and then pay a fee annually through the duration of construction. These documents include a notice of intent, risk assessment, site map, stormwater pollution prevention plan (SWPPP), and signed certification statement. The SWPPP must include measures to ensure that: all pollutants and their sources are controlled; non-stormwater discharges are identified and eliminated, controlled, or treated; site Best Management Practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges; and BMPs installed to reduce or eliminate pollutants after construction are completed and maintained. The Construction General Permit specifies minimum BMP requirements for stormwater control based on the risk level of the site. The Permit also specifies minimum qualifications for a qualified SWPPP developer and qualified SWPPP practitioner.

STATE WATER RESOURCES CONTROL BOARD GENERAL WASTE DISCHARGE REQUIREMENT

The SWRCB adopted a General Waste Discharge Requirement (Order No. 2006-0003) for all publicly owned sanitary sewer collection systems in California with more than 1 mile of sewer pipe. The order provides a consistent statewide approach to reducing sanitary sewer overflows (SSOs) by requiring public sewer system operators to take all feasible steps to control the volume of waste discharged into the system, to prevent sanitary sewer waste from entering the storm sewer system, and to develop a Sewer System Management Plan. The General Waste Discharge Requirement also requires that storm sewer overflows be reported to the SWRCB using an online reporting system.

The SWRCB has delegated authority to nine Regional Water Quality Control Boards (RWQCB) to enforce these requirements within their region. NPDES permits allow the RWQCB to regulate where and how the waste is disposed, including the discharge volume and effluent limits of the waste and the monitoring and reporting responsibilities of the discharger. The San Francisco Bay RWQCB issues and enforces NPDES permits in Millbrae.

CALIFORNIA ASSEMBLY BILL 939

AB 939 (Public Resources Code 41780) requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare Source Reduction and Recycling Elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing and stimulate the purchase of recycled products.

CALIFORNIA ASSEMBLY BILL 341

The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. AB 341 required all businesses that generate four or more cubic yards of garbage per week and multi-family dwellings with five or more units to recycle by July 1, 2012. AB341 also sets a statewide goal of 75 percent waste diversion.

CALIFORNIA SENATE BILL 1016

SB 1016 requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. After an initial determination of diversion requirements in 2006 and establishing diversion rates for subsequent calendar years, the Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. Beginning January 1, 2018, the Board will be required to review a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

CALIFORNIA SENATE BILL 1383

SB 1383 was adopted in September 2016 and establishes targets to achieve a 75 percent reduction in the level of Statewide landfilled organic waste from the 2014 level by 2025. The law grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025. In addition, SB 1383 regulations require that jurisdictions conduct education and outreach on organics recycling to all residents, businesses, haulers, solid waste facilities, and local food banks and other food recovery organizations.

Local Regulations

BAY AREA LONG-TERM RELIABLE WATER SUPPLY STRATEGY

In February 2015, the BAWSCA published the Long-Term Reliable Water Supply Strategy Phase II Final Report developed to meet the projected water needs of its member agencies and their customers through 2035 and to increase their water supply reliability under normal and drought conditions¹⁹. In June 2020, the BAWSCA published the Regional Water Demand and Conservation Projections which developed water demand and conservation projections through 2045 for each BAWSCA member agency and the region overall. The purpose of the Demand Study is to provide valuable insights on long-term water demand patterns and conservation savings potential for the BAWSCA agencies to support regional efforts, such as implementation of BAWSCA's Long-Term Reliable Water Supply Strategy.²⁰

MILLBRAE 2020 URBAN WATER MANAGEMENT PLAN

The City, as required by the California Water Code (CWC), is supplied water to either 3,000 customers or supplies a total annual volume in excess of 3,000 acre-feet per year. As of the fiscal year 2020, the City of Millbrae supplied water to 6,591 municipal water connections and was required to complete an Urban Water Management Plan. The City of Millbrae 2020 UWMP was published in May 2021 and reports the City's water demand and uses for a 20-year planning period. In addition, it discusses the water supply system, current and projected water use, water supply reliability, demand management measures, water shortage contingency planning, and plan implementation.

 ¹⁹ BAWSCA. 2015. Long-Term Reliable Water Supply Strategy. https://bawsca.org/water/reliability/strategy. (accessed March 2022).
 ²⁰ BAWSCA. 2020. Regional Water Demand and Conservation Projections.

https://bawsca.org/uploads/pdf/BAWSCA_Regional_Water_Demand_and_Conservation%20Projections%20Report_Final.pdf. (accessed March 2022).

MILLBRAE GENERAL PLAN

The current Millbrae General Plan contained policies related to utilities and service systems, but they would be replaced by the proposed 2040 General Plan.

MILLBRAE MUNICIPAL CODE

The City of Millbrae Municipal Code contains all ordinances for the city. The Municipal Code is organized by Title, Chapter, and Section. The current Municipal Code is up to date through Ordinance 791, passed November 9, 2021.

The following provisions of Title 6, Sanitation and Health, Title 8, Public Works, and Title 9, Building Regulations, of the Municipal Code help to minimize adverse effects to water supply as a result of development in Millbrae:

Chapter 6.20 Municipal Services

The purpose of this chapter is to regulate the provision of municipal services, including collection of garbage and rubbish, and water and sewer services.

Chapter 8.05 Water Service

This chapter is known as Millbrae's "Water Service Ordinance." It provides rules and regulations for the construction and use of water service or water system, including installation, alteration and repair of such facilities within or connecting to the city's water service or system.

Chapter 8.10 Backflow and Cross-Connection Control Program

The purpose of this chapter is to protect the public potable water supply of the city of Millbrae from the possibility of contamination or pollution due to backflow or cross-connection.

Chapter 8.45 Water Conservation

This chapter outlines the policies, regulations, prohibitions and restrictions regarding the use of water for all customers in the city. It sets out water use and conservation goals by implementing the City's Urban Water Management Plan. Pursuant to the Water Conservation in Landscaping Act, the "model" water efficient landscape ordinance adopted by the Department of Water Resources is enforceable within the city.

Chapter 9.60 Indoor Water Use Efficiency

The purpose of the Indoor Water Use Efficiency Regulation is to enhance public health and welfare by encouraging water conservation measures in the design, construction, and maintenance of buildings. The water use efficiency practices referenced in this section are intended to encourage the conservation of natural resources, increase water efficiency, and lower water costs.

The following provisions of Title 4, Public Safety, Title 6, Sanitation and Health, Title 8, Public Works, and Title 9, Building Regulations, of the Municipal Code help to minimize adverse effects related to wastewater as a result of development in Millbrae:

Chapter 4.65 Hazardous Materials Storage

The purpose of this chapter is the protection of health, life, resources, and property through prevention and control of unauthorized discharges of hazardous materials.

Chapter 6.20 Municipal Services

The purpose of this chapter is to regulate the provision of municipal services, including collection of garbage and rubbish, and water and sewer services.

Chapter 8.20 Municipal Sanitary Sewer System

The purpose of this chapter is to provide for, preserve and protect the public health, safety and general welfare of the citizens of Millbrae, including by:

- 1. Preventing the introduction of pollutants into the Publicly Owned Treatment Works (POTW) that will interfere with its operation;
- 2. Preventing the introduction of pollutants into the POTW that will pass through the POTW inadequately treated into receiving waters or that are otherwise incompatible with the POTW;
- 3. Protecting the general public and POTW personnel who are exposed to wastewater and sludge in the course of their employment; and
- 4. Promoting reuse and recycling of industrial wastewater and sludge from the POTW.

Chapter 9.70 Drainage Connection to Sewers

This chapter prohibits any person, persons, firm, or corporation to cause or permit any water that may accumulate on the roof of any building or on or in any land in the city to flow into any sanitary sewer in said city, by means of any drainpipe or pipes from such building or from such land.

The following provisions of Title 4, Public Safety, Title 6, Sanitation and Health, Title 8, Public Works, and Title 9, Building Regulations, of the Municipal Code help to minimize adverse effects related to solid waste as a result of development in Millbrae:

Chapter 6.05 Single Use Carry-Out Bag Regulations

The purpose of this chapter is to regulate when and how retail establishments shall provide a singleuse carryout bag to a customer, at the check stand, cash register, point of sale or other point of departure for the purpose of transporting food or merchandise out of the establishment in the city. Single use bags shall not be provided except as provided in this section starting on September 1, 2012.

Chapter 6.15 Garbage

The purpose of this chapter is to regulate the disposition and disposal of garbage and waste matter in the city. It affects business, residences and construction sites.

Chapter 6.20 Municipal Services

This chapter includes the regulations for the provision of municipal services, including collection of garbage and rubbish, and water and sewer services.

Chapter 6.30 Recyclable Materials

This chapter includes the regulations for the recycling of materials in the city. It affects businesses, residences and construction sites.

Chapter 6.40 Sustainable Food Service Ware

This chapter includes the regulations for the required use of biodegradable or otherwise "sustainable" disposable food service ware.

Chapter 6.45 Regulating Mandatory Organic Waste Disposal Reduction

This chapter includes regulations for edible food recovery including for residential and commercial organic waste disposal.

CITY OF MILLBRAE STORMWATER POLLUTION PREVENTION PROGRAM

The City of Millbrae Stormwater Pollution Prevention Program is designed to protect the City's storm drain and system and the San Francisco Bay²¹. The program aims to prevent litter, debris, and toxic chemicals from entering storm drains that may prove harmful to the environment. This program is designed to meet requirements of the City's Municipal Regional Stormwater Permit (MRP) and National Pollutant Discharge Elimination System (NPDES) Permits, Orders, and Amendments. Pollutants of Concern are the primary targets of reportable outreach and enforcement efforts, which include identifying sources, taking action to reduce sources, and measuring the success of activities.

MUNICIPAL STORMWATER PERMITTING PROGRAM

The San Francisco Bay Region Municipal Regional Stormwater NPDES Permit, Order No. R2-2015-0049 (MRP) issues the Waste Discharge Requirements and NPDES Permit for the discharge of stormwater runoff from the municipal separate storm sewer systems (MS4s) of over 70 municipalities, including Millbrae, and local agencies in five Bay Area counties²². Under the MRP, permittees are prohibited from non-stormwater discharges into storm drain systems and watercourses. Permitted discharges must not cause or contribute to a violation of any applicable water quality standard for receiving waters. Upon a determination by either the MRP permittee(s) or the RWQCB that discharges are causing or contributing to an exceedance of an applicable water quality standards, the permittee(s) must notify, within no more than 30 days, and thereafter submit a report to the RWQCB. The report must describe controls or best management practices (BMPs) that are currently being implemented, and the current level of implementation, and additional controls or BMPs that will be implemented, and/or an increased level of implementation, to prevent or reduce the discharge of pollutants that are causing or contributing to the exceedance of water quality standards. The MRP also sets forth requirements for monitoring water quality.

Provision C.3 of the MRP establishes discharge requirements for new development and redevelopment projects. The goal of Provision C.3 is for the MRP permittees to use their planning authorities to include appropriate source control, site design, and stormwater treatment measures in new development and redevelopment projects to address stormwater runoff pollutant discharges and prevent increases in runoff flows from new development and redevelopment projects. According to the MRP, this goal is to be accomplished primarily through the implementation of low impact development (LID) techniques.

²¹ Millbrae, City of. 2022. City of Millbrae Stormwater Pollution Prevention Program. https://www.ci.millbrae.ca.us/departmentsservices/public-works/water-pollution-control-plant/pollution-prevention-program/stormwater-program. (accessed March 2022).
²² SWRCB. 2015. San Francisco Bay Region Municipal Regional Stormwater NPDES Permit.

https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/stormwater/Municipal/R2_2015_0049_amended.pdf. (accessed March 2022).

3.13.4 Impacts and Mitigation Measures

Significance Criteria

The City of Millbrae utilizes the following 2022 CEQA Guidelines Appendix G significance criteria questions related to Public Services and Recreation.

Would the 2040 General Plan or Specific Plan:

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
- b) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?
- c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Approach to Analysis

Environmental impacts to utilities and service systems have been assessed using impact significance criteria from federal, State, and local regulations. The impact analysis is based on available literature regarding the existing plans, policies, and resources in the General Plan and Specific Plan areas. Criteria used during this analysis are described below:

Water

The demand for potable water (both with and without use of recycled water) was calculated to assist in determining whether sufficient water supply would be available from the SFPUC. The SFPUC's water provision requirements were also reviewed.

Wastewater

Wastewater production was calculated and compared with treatment capacity to determine whether wastewater treatment requirements would be exceeded. Wastewater discharge permitting requirements were also reviewed.

Stormwater

Stormwater production was calculated and compared with City of Millbrae stormwater facility treatment capacity to determine whether stormwater collection requirements would be exceeded.

Solid Waste

Solid waste production was calculated and compared with the applicable landfill capacity to determine whether landfill daily permitted capacity and total storage capacity would be exceeded. The City's solid waste regulations and policies were also reviewed.

Telecommunications

The telecommunications providers in the City of Millbrae were identified and ability to provide service verified.

See Section 3.6, *Greenhouse Gas Emissions and Energy*, for discussions related to electricity and natural gas.

EIR Scoping Comments Consideration

This section also addresses a verbal public comment received during the EIR public scoping meeting, regarding water supply needs related to additional land uses and housing. Assessment of water supply impacts associated with implementation of the proposed plans and associated growth is discussed under Impact UTL-2. And this section programmatically addresses an SFPUC EIR scoping comment about analyzing impacts to water transmission pipelines in the El Camino right-of-way; see discussion under Impact UTL-1. Project-level impacts to water transmission pipelines within the Specific Plan area would be addressed and mitigated as needed as part of future project environmental review once such project locations and details are known.

Specific Thresholds of Significance

For purposes of this analysis, the following thresholds are used to evaluate the significance of utilities and service systems impacts resulting from implementation of the proposed plans.

- Create a need for relocated, new, or expanded water supply, wastewater treatment, stormwater drainage facilities, or telecommunications facilities, the construction of which would result in significant construction-related transportation, air quality, GHG emissions, energy, or noise impacts. If new or altered facilities are proposed or determined to be needed, then determination of significance of construction-related transportation, air quality, GHG emissions, energy, or noise impacts is based on the respective specific thresholds of significance listed in Section 3.12, *Transportation*; Section 3.2, *Air Quality*; Section 3.6, *Greenhouse Gas Emissions and Energy*; and Section 3.10, *Noise*.
- Result in insufficient water supply to serve the proposed plan's potable water demand during normal, dry, and multiple dry years.
- Inadequate capacity at the Central San facility to serve the proposed plan's wastewater generation
- Insufficient daily capacity or permitted daily capacity at the ACME and Keller Canyon Landfills to serve waste generation of the proposed plans.
- Unable to comply with AB 939 solid waste diversion goals.

Impact Evaluation

Need for Water, Wastewater, Stormwater, and Telecommunication Facilities

Significance Criterion a: Would the proposed plans require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Impact UTL-1 DEVELOPMENT UNDER THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD INCREASE DEMAND FOR WATER, WASTEWATER, STORMWATER, AND TELECOMMUNICATIONS SERVICES. HOWEVER, DEVELOPMENT AND RELOCATION FACILITATED BY THE PROPOSED PLANS, IF APPLICABLE, WOULD OCCUR IN DEVELOPED AREAS OF MILLBRAE WHERE SUCH FACILITIES EXIST AND RELOCATION. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

Water, Wastewater, Stormwater, and Telecommunications

No new or expanded water, wastewater, stormwater, or telecommunications facilities are proposed as part of the 2040 General Plan and Specific Plan. However, the 2040 General Plan and Specific Plan would allow approximately 1,880 residential units and facilitate the addition of 5,151 new residents in Millbrae within the Downtown and El Camino Real corridor. As a result, SFPUC, Millbrae Department of Public Works, and local telecommunications providers could need to incrementally increase their water supply, wastewater, stormwater, and telecommunications services to the City of Millbrae through the year 2040, which could in turn require the construction of new or expanded facilities to accommodate additional utility supply and collection. The placement and potential impacts of a new utility infrastructure and facilities are unknown at this time; if construction or expansion of future facilities are needed separate environmental review would be required, which could result in development and implementation of future project-specific construction-related mitigation measures. The 2040 General Plan and Specific Plan facilitate development within areas of Millbrae that are currently developed. As such, construction of new utility infrastructure or facilities, if required, would likely occur on property previously disturbed or developed and thus within the programmatic analysis for buildout under the 2040 General Plan and Specific Plan as analyzed throughout this EIR. Additionally, construction would be required to comply with all applicable federal, State, and local regulations governing the provision of utility infrastructure and utilities. This would reduce the potential for adverse construction impacts associated with construction of new or expanded utility and infrastructure and facilities associated with implementation of the 2040 General Plan and Specific Plan. However, as determined in Section 3.10, Noise, construction noise and vibration impacts of the proposed plans would be significant and unavoidable. Therefore, construction impacts related to potential need for new or expanded utility infrastructure and facilities would be considered significant and unavoidable.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Water

The UWMP determined that SFPUC has sufficient water supplies to accommodate the anticipated population growth throughout its service area, including the General Plan and Specific Plan areas. In addition, both these areas are located in an urbanized part of the SFPUC's service area and is accounted for in the WSA as described in Chapter 6 of the City's UWMP. As discussed under Impact UTIL-2, there would be sufficient water supplies available to serve the 2040 General Plan and Specific Plan and reasonably foreseeable future development during normal, dry and multiple dry years. In compliance with the California Fire Code, Part 9 of the California Building Standards Code (CBC), development facilitated under both plans would follow standards for fire safety such as fire flow requirements for buildings, fire hydrant location, and distribution criteria.

In addition, the 2040 General Plan contains the following goals and policies that would ensure adequate utility capacity and infrastructure:

Goal LU-10 Ensure the adequate provision of safe and reliable public infrastructure and facilities to meet the City's current and future needs.

- **Policy LU-10.1 Maintaining Public Infrastructure.** The City shall maintain public infrastructure to ensure the provision of safe and reliable infrastructure to meet the City's current and future needs, including facilitating upgrades to the utility infrastructure necessary for improved and emerging technologies.
- **Policy LU-10.3 Development Impact Fees.** The City shall regularly evaluate and update development impact fees, including area fees for specific plan areas, to ensure that new development pays its fair share of costs to offset the costs of public capital facilities and infrastructure that is needed to serve new demand created by development projects. This includes, but is not limited to, fees for public safety, libraries, general government facilities, transportation (including both roadway and alternative mode facility improvements), parks and recreation land and facilities, water, sanitary sewer, stormwater drainage, and other required capital facilities and infrastructure.
- **Policy LU-10.6** Water, Storm Drainage, and Sanitary Sewer System. The City shall continue efforts to replace and retrofit the City water storage tanks, water distribution system, storm drainage system, and the sanitary sewer collection system.

With implementation of these policies, sufficient water supply and WTP capacity would be maintained. Therefore, 2040 General Plan and Specific Plan operational impacts related to adequacy, capacity, and need for new water supply infrastructure facilities as a result of water supply demand would be less than significant.

Wastewater

The City of Millbrae owns and operates 55 miles of gravity sewer pipe and also owns and maintains 22 miles of publicly owned sewer laterals. The City recently invested in upgrades to both the wastewater collection system and the water pollution control plant. At operation, the 2040 General Plan would result in an average dry weather flow of approximately 2.21 mgd, and the Specific Plan

would result in an average dry weather flow of approximately 0.6 mgd.²³ In 2012, the City completed a collection system capacity assurance report that quantified existing average dry weather flow and projected future average dry weather flow. These projections reflect that the service area is nearly built out. However, growth anticipated from the proposed Specific Plan was accounted for in projection values. In addition, with implementation of the policies mentioned above, sufficient wastewater collection and WWTP capacity would be maintained. Therefore, 2040 General Plan and Specific Plan operational impacts related to adequacy, capacity, and need for new wastewater infrastructure facilities as a result of wastewater generation would be less than significant.

Stormwater

As described in Impact HYD-2 in Section 3.8, *Hydrology and Water Quality*, development facilitated by the 2040 General Plan and Specific Plan would reduce the extent of impervious surfaces within the General Plan and Specific Plan areas, which could in turn reduce stormwater runoff that enters the City's municipal storm drain system. In addition, because the 2040 General Plan and Specific Plan are focused on infill development, the conversion of open space and permeable surfaces to impervious surfaces would be minimized. Furthermore, the amount of impervious surfaces would be reduced through implementation of Best Management Practices, including Low Impact Development (LID) approaches, aimed at reducing stormwater runoff to ensure downstream storm drain capacity is not exceeded. Therefore, stormwater generated by operation of development facilitated by the proposed plans would not exceed the capacity of existing or planned stormwater drainage and storage systems.

In addition, the 2040 General Plan contains the following goals and policies that would ensure adequate utility capacity and infrastructure:

Goal LU-10 Ensure the adequate provision of safe and reliable public infrastructure and facilities to meet the City's current and future needs.

Policy LU-10.6 Water, Storm Drainage, and Sanitary Sewer System. The City shall continue efforts to replace and retrofit the City water storage tanks, water distribution system, storm drainage system, and the sanitary sewer collection system.

Goal HSHM-4 P Protect life and minimize property damage from potential flooding.

Policy HSHM-4.4 Storm Drainage System. The City shall continue to work with the San Mateo County Flood Control District to improve and upgrade the storm drainage system. The City shall consider integrating green infrastructure into the storm drainage system in accordance with the City's adopted Green Infrastructure Plan, particularly in downtown and along the El Camino Real corridor, to reduce stormwater runoff and to reduce the potential for flooding.

With implementation of the policies mentioned above and LID techniques, sufficient stormwater collection would be maintained. Therefore, 2040 General Plan and Specific Plan operational impacts related to adequacy, capacity, and need for new stormwater infrastructure facilities as a result of stormwater generation would be less than significant.

²³ Millbrae, City of. 2021. City of Millbrae Downtown and El Camino Real Specific Plan Infrastructure Report prepared by West Yost, December 2021.

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Telecommunications

At operation, the 2040 General Plan and Specific Plan would increase demand for internet and telephone services provided by local telecommunications providers. The library, park district, and future residents would coordinate with telecommunication providers to provide service. The plan areas are located in an urbanized area of Millbrae where existing telecommunications providers already offer internet and telephone services. The proposed plans would include new connections from existing telecommunications lines along El Camino Real and Broadway. As such, at operation the proposed plans would not require the relocation or expansion of telecommunications infrastructure, due to local telecommunications providers continuing to provide adequate telecommunications capacity and access.

In addition, with implementation of the policies mentioned above, sufficient telecommunications access would be maintained. Therefore, 2040 General Plan and Specific Plan operational impacts related to access, capacity, and need for new telecommunications infrastructure facilities as a result of telecommunications demand would be less than significant

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Water Supply Availability

Significance Criterion b: Would the proposed plans have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact UTL-2 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD INCREASE DEMAND FOR WATER SUPPLY. HOWEVER, WITH ADHERENCE TO THE 2040 GENERAL PLAN AND SPECIFIC PLAN POLICIES, WATER SUPPLIES WOULD BE ADEQUATE TO SUPPORT FUTURE DEVELOPMENT. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

While construction under the 2040 General Plan and Specific Plan could necessitate the occasional use of minimal, limited quantity of water for dust control, mixing concrete, and washing equipment and vehicles, impacts related to water supplies are primarily limited to operational impacts. Therefore, 2040 General Plan and Specific Plan construction impacts related to need for new water supply as a result of water demand would be less than significant.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

In 2020, the City's total service population was 22,832²⁴. The City's UWMP projects Millbrae's population to be 27,081 by 2040 which is accounted for in the analysis of water management within the UWMP.²⁵ As discussed in Section 3.9, *Land Use and Planning & Population and Housing*, all proposed land use changes in the General Plan area would occur under the Specific Plan. Development facilitated by the 2040 General Plan and Specific Plan is projected to result in approximately 1,880 additional residential units in Millbrae by the year 2040. As discussed within Section 3.9, *Land Use/Planning and Population/Housing*, this additional housing, coupled with ongoing and planned development, would lead to a population approximately 27,660 residents by 2040. Accordingly, the estimated population increase under the proposed plans would exceed the projected population increase within the Millbrae UWMP by approximately 2 percent.

In general, the City of Millbrae has experienced declining water demands over the past 10 years.²⁶ This is likely due to a number of factors, including advances in water use efficiency, increased conservation awareness, periodic economic hardship, and drought regulations. However, it should also be noted that Millbrae's population grew by an estimated 663 residents during this time, making the decrease in total water purchases even more significant.²⁷ From 2017 to 2019, increases in water use were largely associated with the end of a drought and the removal of associated water use restrictions. Over the past 5 years from 2017 to 2021, average annual demand has been approximately 636 million gallons (mg). The lowest demand during this period occurred during fiscal year 2016, with a total demand of 583 mg. Based on the population projections presented above and Millbrae's planned active and passive conservation measures, the water demand projections for Millbrae through 2045 are shown in Table 3.13-4.

Year	2020	2025 ²	2030 ²	2035 ²	2040 ²	2045 ²
Total Demand ¹	685	835	913	897	1029	1170

Table 3.13-4 City of Millbrae Water Demand

¹ Demand projections include passive and active conservation measures identified by the City.

² Projections based on BAWSCA projected demands (mg) for the City of Millbrae using DSS model

Source: Millbrae, City of. 2021. Millbrae UWMP- Table 4-2.

The total projected demands for the years 2025 to 2045 are estimated to increase from 835 MG to 1,170 mg. The Millbrae purchases its entire potable water supply from the RWS, operated by the SFPUC. Total annual water supply available to the City is set forth in the WSA and subsequent Water Sales Contract, agreed upon between the City of Millbrae and SFPUC. During normal water years, the Millbrae's Individual Supply Guarantee (ISG) is 3.15 mgd, which corresponds to an annual volume of 1,150 mgd.

²⁴ Millbrae, City of. 2020. 2021 Urban Water Management Plan – Figure ES-3. https://www.ci.millbrae.ca.us/departments-services/publicworks/water-conservation/millbrae-2020-urban-water-management-plan. (accessed June 2022).

²⁵ Due to the timing of the 2020 UWMP, the City utilized ABAG population projections from Plan Bay Area 2045. ABAG has since adopted Plan Bay Area 2050 which released updated population projections for the City, however, the UWMP projected water demand analysis within the UWMP were based upon the prior report's numbers.

²⁶ Millbrae, City of. 2020. 2021 Urban Water Management Plan. https://www.ci.millbrae.ca.us/departments-services/public-works/waterconservation/millbrae-2020-urban-water-management-plan. (accessed March 2022).

²⁷ Millbrae, City of. 2020. 2021 Urban Water Management Plan. https://www.ci.millbrae.ca.us/departments-services/public-works/waterconservation/millbrae-2020-urban-water-management-plan. (accessed March 2022).

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SFPUC is under a WSA contract with wholesale customers that includes a "Supply Assurance" that SFPUC will provide 184 mgd to its wholesale customers. SFPUC has agreed to deliver water to wholesale customers up to the amount of the Supply Assurance, and this agreement is perpetual and survives the expiration of the WSA. As a result of the ISG, the SFPUC has a responsibility to provide 184 MGD to its wholesale customers in perpetuity, regardless of demand. Therefore, the current projections for purchase requests through 2018 remain at 265 MGD, which includes wholesale and retail demand.

In December 2018, SWRCB adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment) to establish water quality objectives to maintain the health of the Bay-Delta ecosystem. The Bay-Delta Plan Amendment requires the release of 30-50 percent of the "unimpaired flow" on the three tributaries from February through June in every year type. If the Bay-Delta Plan Amendment is implemented, the SFPUC will be able to meet the projected water demands presented in the Millbrae UWMP in normal years but would experience supply shortages of greater than 20 percent in single dry years or multiple dry years. With implementation of the Bay-Delta Plan Amendment, Millbrae is projected to experience supply shortfalls of up to 46 percent in 2045 in a single dry year, based on the reliability analysis provided by SFPUC, as shown in Table 3.13-5.

	2025	2030	2035	2040	2045
Total Supply (mg)	533	580	569	653	635
Total Demand (mg)	835	913	896	1,029	1,170

Table 3.13-5 Single Dry Year Supply and Demand Comparison

Similar to the single dry year scenario, Millbrae is also projected to experience significant supply shortfalls in multiple dry years scenarios with implementation of the Bay-Delta Plan Amendment. In years 2 through 5 of a multiple dry year event, the City is projected to experience shortages of up to 54 percent in 2045 based on projected demands and the reliability analysis provided by SFPUC and BAWSCA.²⁸

If the Bay-Delta Plan is not implemented, Millbrae's projected available water supply in dry years would increase significantly. According to the UWMP, Millbrae would generally be able to receive over 62 percent of its normal annual supply throughout consecutive dry years without implementation of the Bay-Delta Plan Amendment. SFPUC is in the process of developing an Alternative Water Supply Planning Program to ensure that San Francisco can meet its retail and wholesale customer water needs and address projected dry years shortages through 2045.²⁹ To address the potential impacts on the water supply during projected dry year shortages, both SFPUC and BAWSCA have set in place projects or studies to help address these vulnerabilities. In addition, SFPUC created the Water Supply Improvement Program (WSIP), which has the stated goal of increasing supply reliability for the wholesale and retail customers of the RWS. Many of the SFPUC projects included in the WSIP involve increasing storage capacity or otherwise improving storage function and reliability.

²⁸ Millbrae, City of. 2020. 2021 Urban Water Management Plan. https://www.ci.millbrae.ca.us/departments-services/public-works/waterconservation/millbrae-2020-urban-water-management-plan. (accessed March 2022).

²⁹ SFPUC. 2021. Alternative Water Supplies. https://sfpuc.org/programs/future-water-supply-planning/alternative-water-

supplies#:~:text=The%20goal%20of%20the%20Alternative,available%20in%20the%20coming%20decades. (accessed March 2022).

Regardless of implementation of the Bay-Delta Plan, current water supplies could potentially be insufficient to meet demand from the proposed plans' estimated population of 27,660, which would exceed the projected population increase within the Millbrae UWMP by approximately 2 percent. However, this is nominal exceedance and compliance with the following 2040 General Plan policies would reduce impacts on water supplies and encourage the conservation of water:

Goal NRC-3 Conserve water resources to provide for long-term community water needs.

- **Policy NRC-3.1** Water Conservation. The City shall require water conservation in existing and new development consistent with Urban Water Management Plan (UWMP) and continue to work with the Bay Area Water Supply and Conservation Agency (BAWSCA) on a regional approach to water conservation. The City will implement cost-effective conservation strategies and programs that increase water use efficiency, including providing incentives for adoption of water-efficiency measures.
- Policy NRC-3.2 Indoor Water Use. The City shall require project applicants to comply with the California Green Building Standards Code (CALGreen) regulations to conserve indoor water use.
- **Policy NRC-3.3** Water Efficient Landscaping. The City shall continue to require that new or retrofitted landscapes comply with the current Water Efficient Landscape Ordinance (WELO).
- **Policy NRC-3.4 Recycled Water.** The City shall encourage the use of recycled water for parks and private landscapes when available and encourage greywater ready construction.
- **Policy NRC-3.6** Water Efficiency Education. The City shall continue to work with BAWSCA, the SFPUC and other regional partners to host community workshops that educate residents and business owners about reducing water consumption through efficiency and conservation, including promoting existing and new rebate programs for water efficient appliances, fixtures and drought tolerant landscape.

Further, compliance with Climate Action Plan Measures 20 and 21, ³⁰ which include rebates for efficient appliances and fixtures as well as implementation of State water efficiency requirements, would further reduce water use through the promotion of water efficiency and conservation. Thus, while the development facilitated by the proposed plans would result in slightly additional population beyond the projected population within the Millbrae UWMP, adherence to the General Plan policies and Climate Action Plan measures would reduce per capita water use. In addition, future developments that meet certain criteria under Senate Bill 610 will be required to prepare a project-level water supply assessment, which identifies and verifies water supply availability under normal water year conditions, single dry year conditions, and multiple dry year conditions. Therefore, with implementation of the aforementioned policies and requirement for future development of certain minimum size to prepare water supply assessments, 2040 General Plan and Specific Plan impacts related to sufficient water supplies would be less than significant.

³⁰ Millbrae, City of. 2020. City of Millbrae Final 2020 Climate Action Plan.

https://www.ci.millbrae.ca.us/home/showpublisheddocument/24105/637405337457930000. (accessed June 2022).

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Wastewater Treatment Capacity

Significance Criterion c: Would the proposed plans result in a determination by the wastewater	
treatment provider which serves or may serve the project that it has	
adequate capacity to serve the project's projected demand in addition to)
the provider's existing commitments?	

Impact UTL-3 DEVELOPMENT PROJECTED BY THE PROPOSED PLANS WOULD INCREASE DEMAND FOR WASTEWATER TREATMENT. HOWEVER, THE EXISTING WASTEWATER TREATMENT PLANT HAS SUFFICIENT CAPACITY FOR FUTURE DEVELOPMENT, AND THE 2040 GENERAL PLAN CONTAINS POLICIES TO ENSURE TREATMENT IS ADEQUATE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Impacts related to adequate wastewater treatment capacity are limited to operational impacts. No respective construction impacts would occur.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Implementation of the proposed plans could have a significant impact if the wastewater treatment provider would not have sufficient capacity to serve the proposed new land uses in addition to the provider's existing commitments.

Growth and development facilitated by the 2040 General Plan would create additional demand for wastewater treatment in Millbrae. Because development facilitated by the 2040 General Plan would occur within the urbanized Specific Plan area of the City, existing wastewater infrastructure exists. Similar to water infrastructure, increased density could require upgraded wastewater pipelines or pumps. Development facilitated by the Specific Plan is projected to result in approximately 1,880 additional residential units in Millbrae which would result in approximately 5,151 new residents by the year 2040. As discussed within Section 3.9, *Land Use/Planning and Population/Housing*, this additional housing, coupled with ongoing and planned development, would lead to a population approximately 27,660 residents by 2040. The increase of 5,151 residents proposed under the proposed plans equates to an approximately 22 percent increase above the existing population. Millbrae wastewater is treated at either the SVWTP or the HTWTP. The SVWTP primarily treats water from the Alameda System reservoirs and has both a peak capacity and sustainable capacity of 160 mgd. The HTWTP treats water from the Peninsula System reservoirs and has a peak capacity of 180 mgd and a sustainable capacity of 140 mgd. The projected wastewater demand of the proposed plans is shown in below in Table 3.13-6.

Development Type	Existing Wastewater Flows (gpd)	Project Wastewater Flows (gpd)	
Non-Residential	74,474	189,766	
Residential	154,056	376,568	
Total	228,531	566,333	

Table 3.13-6 Proposed Plans Projected Wastewater Generation by Development Type

gpd = gallons per day

Source: Downtown and El Camino Real Specific Plan Infrastructure Report, December 2021

The SVWTP currently reaches its maximum daily capacity at 160 mgd, but Millbrae is also served by the HTWTP, which has a remaining capacity of approximately 22 percent. As shown in Table 3.13-6, development facilitated by the proposed plans would generate approximately 566,333 gallons of wastewater per day. Accordingly, there is sufficient treatment capacity at the HTWTP for the growth and development that would be facilitated by the 2040 General Plan and Specific Plan.

In addition, the following 2040 General Plan goals and policies would ensure new development is connected to the existing sanitary sewer system and that wastewater service is adequate.

Goal LU-10 Ensure the adequate provision of safe and reliable public infrastructure and facilities to meet the City's current and future needs.

- Policy LU-10.1 Maintaining Public Infrastructure. The City shall maintain public infrastructure to ensure the provision of safe and reliable infrastructure to meet the City's current and future needs, including facilitating upgrades to the utility infrastructure necessary for improved and emerging technologies.
- **Policy LU-10.3 Development Impact Fees.** The City shall regularly evaluate and update development impact fees, including area fees for specific plan areas, to ensure that new development pays its fair share of costs to offset the costs of public capital facilities and infrastructure that is needed to serve new demand created by development projects. This includes, but is not limited to, fees for public safety, libraries, general government facilities, transportation (including both roadway and alternative mode facility improvements), parks and recreation land and facilities, water, sanitary sewer, stormwater drainage, and other required capital facilities and infrastructure.
- Policy LU-10.4 Capital Improvement Program. The City shall continue to fund maintenance, improvements, and expansion of city infrastructure, including sewer and sanitary sewer utility lines and water infrastructure through a multi-year Capital Improvement Program.
- **Policy LU-10.6** Water, Storm Drainage, and Sanitary Sewer System. The City shall continue efforts to replace and retrofit the City water storage tanks, water distribution system, storm drainage system, and the sanitary sewer collection system.

Implementation of these policies and the existing WWTPs capacity would ensure adequate wastewater treatment capacity for future development under the proposed plans. Therefore, 2040 General Plan and Specific Plan impacts related to sufficient water supplies would be less than significant.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

Landfill Capacity and Solid Waste Reduction Regulations Consistency

Significance Criterion d:	Would the proposed plans generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
Significance Criterion e:	Would the proposed plans comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Impact UTL-4 DEVELOPMENT FACILITATED UNDER THE 2040 GENERAL PLAN AND SPECIFIC PLAN WOULD SLIGHTLY INCREASE THE VOLUME OF SOLID WASTE GENERATED IN MILLBRAE. HOWEVER, EXISTING INFRASTRUCTURE THAT SERVES THE CITY, AS WELL AS POLICIES WITHIN THE 2040 GENERAL PLAN, WOULD ENSURE THAT THE CITY HAS ADEQUATE CAPACITY TO ACCEPT THE INCREASE IN SOLID WASTE AND COMPLY WITH FEDERAL, STATE, AND LOCAL MANAGEMENT REDUCTION REGULATIONS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

2040 GENERAL PLAN AND SPECIFIC PLAN

Construction facilitated by the 2040 General Plan and Specific Plan would involve in the redevelopment of existing buildings, surface parking lots, and landscaping. This would result in the generation of solid waste from demolition and on-site construction activities. Future projects developed under the proposed plans that would entail construction and generate solid waste would be further analyzed under separate CEQA review as part of each individual project to ensure that construction-generated solid waste is not in excess of State or local standards or the capacity of local landfills, or otherwise impair the attainment of solid waste reduction goals. Therefore, construction impacts related to landfill capacity and solid waste reduction goals consistency would be less than significant.

Operation

2040 GENERAL PLAN AND SPECIFIC PLAN

Development facilitated by the proposed plans could result in the addition of up to 5,151 residents and 1,880 residential units throughout Millbrae. Based on a solid waste generation rate of 5.31 pounds per dwelling unit per year,³¹ the proposed plans would generate an estimated 9,983 pounds per day or about 3.6 million pounds per year (or 1,800 tons per year). According to CalRecycle, the Corinda Los Trancos Landfill has a maximum throughput of approximately 3,598 tons per day and

³¹ CalRecycle. 2019. Estimated Solid Waste Generation Rates. https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates (accessed March 2022)

anticipated closure date of January 1, 2034.³² The proposed plans would yield an annual solid waste generation of approximately 9,983 pounds per day, which would account for approximately 0.14 percent of the throughput of the Corinda Los Trancos Landfill. Therefore, development facilitated by the 2040 General Plan and Specific Plan would not generate solid waste in excess of the capacity of local solid waste infrastructure.

In addition, the 2040 General Plan contains the following goals and associated policies to address solid waste generation and disposal within Millbrae.

Goal NRC-6 Reduce solid waste generation, increase recycling and composting, and provide for the adequate collection and disposal of solid waste.

- Policy NRC-6.1 Solid Waste Diversion and Recycling. The City shall encourage increased community participation in recycling and composting programs and weekly collection of recyclables and organic waste to achieve set diversion goals consistent with governing law.
- **Policy NRC-6.2 Construction and Demolition Waste.** The City shall continue to require all developments to comply with the current CALGreen requirements for construction and demolition waste diversion.
- Policy NRC-6.3 Integrated Waste Management. The City shall continue to implement the AB 939 Integrated Waste Management Plan to meet the waste diversion requirements of the California Integrated Waste Management Act (AB 939) and related legislation.
- **Policy NRC-6.4 Sustainable Purchasing Policy.** The City shall prioritize purchasing products that are made with postconsumer recycled content; are recyclable, compostable, or reusable; are less toxic than conventional goods; are manufactured locally; and are fairly traded.
- Policy NRC-6.5 Solid Waste Diversion Ordinances. The City shall continue to implement the Disposable Food Service Ware Ordinance (Adopted February 23, 2021) and the Single-Use Carryout Bag Ordinance (adopted in 2012) to divert and reduce solid waste and single-use plastics.
- **Policy NRC-6.6** Waste Management Services. The City shall continue to contract waste management services to provide quality and cost-effective solid waste removal throughout the city and require all residents and businesses to comply with solid waste collection service requirements.
- **Policy NRC-6.7 Bay Area Green Business Program.** The City shall continue to participate in the Bay Area Green Business Program that allows businesses to brand themselves as green by following sustainable practices.
- **Policy NRC-6.8** Waste Education. The City shall continue to provide programs to educate residents about waste reduction, proper waste disposal practices and strategies to help residents and businesses reduce waste.
- Policy NRC-6.9 Organic Waste and Reduction. The City shall require all new development to comply with Chapter 6.45 Regulating Mandatory Organic Waste Disposal Reduction and (2) Section 2.20.150 to Chapter 2.20 Purchasing System,

³² CalRecycle. 2019 SWIS Facility/Site Activity Details Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002).

https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223. (accessed March 2022).

regarding procurement of recovered organic waste products to comply with Senate Bill 1383, California's Short-Lived Climate Pollutants Reduction Act (2016).

Development facilitated by the proposed plans would be required to comply with these policies, including paying a fair share for solid waste services and achieving greater diversion rates than required by AB 939. Pursuant to AB 939 the City must divert 50 percent of solid waste from landfills. Local infrastructure and SSFSC would have the capacity to accommodate and collect solid waste generated by the proposed plans. Development facilitated by the proposed plans would also be required to demonstrate compliance with all applicable federal, State, and local regulations related to management and reduction of solid waste, including related to recycling and composting (e.g., California Senate Bill 1383). Therefore, the 2040 General Plan and Specific Plan would have a less than significant impact related to local solid waste infrastructure capacity and solid waste management and reduction regulations consistency.

Mitigation Measures

No mitigation is required.

Level of Significance

Less than significant without mitigation

3.13.5 Cumulative Impacts

The geographic scope of the cumulative utilities and service systems analysis is the SFPUC, Millbrae Public Works, and South San Francisco Scavenger Company (SSFSC) service areas. Because of differences in the nature of the utility and service system topical areas, they are discussed separately. The cumulative analysis considers the nearby past, present, and reasonably foreseeable future plans and projects listed in Table 3-1 (refer to Chapter 3, *Environmental Impact Analysis*) located in Millbrae, Burlingame, South San Francisco, and at the San Francisco International Airport in addition to the proposed plans.

Water Supply Infrastructure and Facilities

SFPUC provides potable water to residents and businesses within the San Francisco peninsula, including Millbrae. The SFPUC considered the existing capacity and future demand for capacity to determine needed updates to water facilities. In the course of preparing the UWMP, SFPUC estimated water demand of future development in the service area and forecast the needed facility upgrades. The forecast included supply facility upgrades needed to accommodate growth in the service area, including Millbrae. The SFPUC prepared a UWMP that considered the buildout potential across the service area. The UWMP determined that the SFPUC would be able to provide adequate water supplies to the City during normal years but would see shortfalls during dry years. However, while the development facilitated by the proposed plans would result in slightly additional population beyond the projected population within the Millbrae UWMP, adherence to the General Plan policies and Climate Action Plan measures would reduce per capita water use. In addition, future developments that meet certain criteria under Senate Bill 610 will be required to prepare a project-level water supply assessment, which identifies and verifies water supply availability under normal water year conditions, single dry year conditions, and multiple dry year conditions. Furthermore, cumulative plans and projects listed in Table 3-1 would be required to comply with

provisions of the respective municipal codes and California Green Building Code related to water conservation. Therefore, the cumulative impact related to water supply infrastructure and facilities would be less than significant.

Wastewater Infrastructure and Facilities

Millbrae Public Works provides wastewater collection and treatment services for the residents and business in Millbrae. Millbrae is in the process of upgrading the capacity in its sanitary sewer collection system, the purpose of which is to reduce sanitary sewer overflows (SSOs) in the City's sanitary sewer collection system and to enhance compliance with the applicable permits, laws, and regulations as related to sanitary sewer overflows. The forecast included treatment facility upgrades needed to accommodate growth in the service area and maintain compliance with applicable regulatory standards for wastewater treatment and discharge. Cumulative plans and projects would generate volumes of wastewater. The Cities of Millbrae, Burlingame, and South San Francisco anticipate development in the respective cities and determined that capacity would exist to service the demand for wastewater treatment facilities. Therefore, the cumulative impact related to wastewater infrastructure and facilities would be less than significant.

Stormwater Infrastructure and Facilities

Cumulative plans and projects predominantly consist of residential and commercial uses. The cumulative plans and projects would be located in urban areas that would be served by existing municipal storm drainage systems. Consistent with measures in the Millbrae, Burlingame, and South San Francisco Municipal Codes, development in the cities would incorporate a stormwater control plan and stormwater collection systems into the development that would in turn reduce the volume and velocity of stormwater runoff that cumulative development would generate. Therefore, the cumulative impact related to stormwater infrastructure and facilities would be less than significant.

Solid Waste Facilities

South San Francisco Scavenger Company (SSFSC) operates solid waste landfills and oversees regional waste diversion programs as well as solid waste and recycling collection services. SSFSC anticipates it would be able to absorb future growth. Cumulative plans and projects listed consist predominantly of residential and commercial uses. However, as with the surrounding areas, new cumulative development (residential and non-residential) would increase demand on solid waste facilities to receive, process, and store solid waste. The Corinda Los Trancos Landfill has a total permitted capacity 60,500,000 cubic yards with a remaining capacity of 22,180,000 cubic yards and a closure date of 2034. The anticipated waste volume of development in the plan area represents less than one percent of the landfill's permitted daily capacity. Existing solid waste facilities provide sufficient capacity to serve development anticipated in the Cities of Millbrae, Burlingame, and South San Francisco as well as existing, planned, and probable future land uses in the respective cities for the foreseeable future. Therefore, the cumulative impact related to solid waste facilities would be less than significant.

Overall Level of Cumulative Significance

Less than significant

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4 Other CEQA Sections

This chapter discusses growth-inducing impacts and irreversible environmental impacts that would be caused by the proposed plans.

4.1 Growth Inducing Impacts

There are two types of growth-inducing impacts that a plan or project may have: direct and indirect. To assess the potential for growth-inducing impacts, the proposed plans' characteristics that may encourage and facilitate activities that individually or cumulatively may affect the environment must be evaluated. CEQA Guidelines Section 15126.2(d) requires a discussion of a proposed plan or project's potential to foster economic or population growth, including ways in which could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The CEQA Guidelines, as interpreted by the City, state that a significant growth-inducing impact may result if the proposed plans would:

- Induce substantial population growth in an area (for example, by proposing or facilitating new residences or employment-generating uses beyond the land use density/intensity envisioned in the general plan);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or
- Include extensions of roads or other infrastructure not assumed in the general plan or adopted capital improvements project list, when such infrastructure exceeds the needs of a project and could accommodate unplanned future development.

Direct growth-inducing impacts occur when the implementation of a plan or project imposes new burdens on a community by directly inducing population growth, or by leading to the construction of additional developments in the same area. Also included in this category are plans or projects that remove physical obstacles to population growth (such as a new road into an undeveloped area or a wastewater treatment plant with excess capacity that could allow additional development in the service area). Construction of these types of infrastructure cannot be considered isolated from the development they facilitate and serve. Plans or projects that physically remove obstacles to growth, or projects that indirectly induce growth, may provide a catalyst for future unrelated development in an area such as a new residential community that requires additional commercial uses to support residents.

4.1.1 Population and Employment Growth

As discussed in Section 3.9, *Land Use/Planning and Population/Housing*, the buildout anticipated under the 2040 General Plan and Specific Plan could accommodate an estimated 4,096 new residents and 1,413 new dwelling units in the City of Millbrae. With the estimated growth under the 2040 General Plan, Millbrae would have a 2040 population of 26,605 and 10,050 dwelling units. Additionally, ABAG estimates that Millbrae would have an additional 5,025 jobs by 2040 for a total of 11,595 within the City.

City of Millbrae 2040 General Plan + Downtown & El Camino Real Specific Plan

It is anticipated that buildout under the proposed plans would directly support the population growth and subsequent housing needs within the City's projected growth estimates. Since much of Millbrae is currently developed and used for residential, commercial, and various other uses, implementation of the proposed plans would largely entail the development or redevelopment of vacant and underutilized parcels throughout the City. As discussed under Impact LU-1 and LU-2, the proposed plans aim to intensify and densify development within the 2040 General Plan and Specific Plan areas to accommodate anticipated population growth and housing needs within the city. New and revised 2040 General Plan land use and planning policies aim to provide guidance for orderly development while balancing the land use needs for housing, residential and commercial services, civic needs, and jobs.

It is the specific purpose of the proposed plans to guide growth and development in Millbrae such that infill development would be prioritized, and open space areas would be preserved and enhanced. Therefore, by its nature, the proposed project is intended to reduce the potential for uncontrolled growth and associated environmental impacts. For the reasons discussed above, implementation of the project would not lead to direct or indirect growth impacts beyond what is anticipated and planned for by Millbrae and ABAG.

4.1.2 Removal of Obstacles to Growth

As discussed under Impact LU-1 and LU-2 in Section 3.9, *Land Use/Planning and Population/Housing*, much of Millbrae is developed, and the proposed plans encourage infill development and redevelopment to meet the City's anticipated population and employment growth and housing needs. Although development of some vacant land within Millbrae would require new utility connections, new development would occur where existing roads, water, and sewer and other utilities are in place and in a manner that minimizes the impact of development on existing infrastructure and services. Major infrastructure extensions are not envisioned due to the high level of existing development within Millbrae, and improvements would be primarily limited to the replacement and/or upgrade of aging facilities and enhancement of existing infrastructure as needed on a project-by-project basis. All new development envisioned as part of the 2040 General Plan and Specific Plan would occur within City limits. Therefore, because new development would use existing facilities and major infrastructure extensions would not occur, the proposed plans would not remove obstacles to unplanned growth within Millbrae.

4.2 Irreversible Environmental Effects

CEQA Guidelines Section 15126(c) requires that EIRs evaluating projects involving amendments to public plans, ordinances, or policies contain a discussion of significant irreversible environmental changes. CEQA also requires decision-makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. This section addresses the use of non-renewable resources, the commitment of future generations to the proposed development and land use changes, and irreversible impacts associated with the development that would be facilitated by implementation of the 2040 General Plan and Specific Plan.

Construction activity associated with planned development accommodated under the proposed plans would include the use of building materials and energy, some of which would be nonrenewable resources. Consumption of these resources would occur with any development in the Bay Area region and are not unique to Millbrae or the proposed plans. The addition of new residential and non-residential development in the Millbrae through 2040 would irreversibly increase local demand for non-renewable energy resources such as petroleum and natural gas. Increasingly efficient building fixtures and automobile engines, as well as implementation of policies included in the 2040 General Plan and Specific Plan, are expected to offset the demand for non-renewable energy to some degree. Growth resulting from implementation of the proposed plans is not anticipated to significantly affect local or regional energy supplies; and project impacts related to energy consumption are further evaluated in Section 3.6, *Greenhouse Gas Emissions and Energy*.

Growth facilitated by the proposed plans would require an irreversible commitment of City services, water supply, and wastewater treatment. As discussed in Section 3.12, *Public Services and Recreation*, and Section 3.13, *Utilities and Service Systems*, impacts to public services and utilities would be reduced to a less-than-significant level with implementation of policies included in the proposed plans.

Growth associated with the 2040 General Plan and Specific Plan through 2040 would incrementally increase local vehicle miles traveled (VMT), noise levels, and regional air pollutant and greenhouse gas (GHG) emissions. As discussed in Section 3.2, *Air Quality*, and Section 3.6, *Greenhouse Gas Emissions and Energy*, implementation of the proposed plans policies, regional air pollution programs, and mitigation measures would reduce the air pollutant and GHG emissions associated with individual future development projects; however, air quality pollutants and GHG emissions would not be reduced to below significant thresholds. As discussed in Section 3.10, *Noise*, implementation of proposed policies and mitigation measures would reduce the noise impacts associated with future growth but not to a less-than-significant level. As discussed in Section 3.12, *Transportation*, the policies in the proposed plans and mitigation measures would reduce many transportation impacts to a less-than-significant level; however, population growth facilitated by the proposed plans combined with regional population growth would result in additional vehicle trips on area roadways, resulting in significant and unavoidable traffic impacts on several roadways.

4.3 Mandatory Findings of Significance

Per CEQA Guidelines Appendix G Section XVIII, the following mandatory findings of significance analysis is provided.

a. Do the proposed plans have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

The 2040 General Plan and Specific Plan would not facilitate development that would eliminate or threaten wildlife habitats. Therefore, as discussed in more detail in Section 3.3, *Biological, Agricultural, and Forestry Resources,* the 2040 General Plan and Specific Plan would result in less-than-significant-with-mitigation impacts related to wildlife habitats. However, the 2040 General Plan and Specific Plan could potentially eliminate important examples of the major periods of California history or prehistory. Therefore, as discussed in more detail in Section 3.4, *Cultural and Tribal Cultural Resources,* the 2040 General Plan and Specific Plan would result in a significant and unavoidable impact related to cultural resources, specifically historical resources.

b. Do the proposed plans have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

While the proposed 2040 General Plan and Specific Plan policies encourage residents, businesses, and the City to reduce energy, fuel use, water use, VMT, and solid waste generation and the associated GHG emissions, the proposed plans would still result in significant and unavoidable impacts related to VMT and GHG emissions. In addition, as discussed throughout the respective cumulative impacts discussions within this EIR, the 2040 General Plan and Specific Plan would also result in significant cumulative impacts for the similar topics. Therefore, the 2040 General Plan and Specific Plan would result in an overall significant and unavoidable cumulative impact related to all CEQA topics addressed within this EIR.

c. Do the proposed plans have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The 2040 General Plan and Specific Plan would result in adverse effects on human beings. As discussed in more detail in Sections 3.2, *Air Quality*, 3.6, *Greenhouse Gas Emissions and Energy*, 3.7, *Hazards, Hazardous Materials, and Wildfire*, 3.10, *Noise*, and 3.13, *Transportation*, implementation of the 2040 General Plan and Specific Plan could result in impacts related to transportation, air quality, GHG emission, noise, and hazards that could, in turn, affect human beings. Therefore, the 2040 General Plan and Specific Plan would result in an overall significant and unavoidable impact related to potential for adverse effects on human beings.

5 **EIR Alternatives**

5.1 Introduction

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15126.6, this chapter contains a comparative impact assessment of alternatives to the 2040 General Plan and Specific Plan (proposed plans). The primary purpose of an alternatives analysis under CEQA is to provide decision-makers and the public with a reasonable range of feasible alternatives to the proposed plans that could attain most of the basic plans' objectives, while avoiding or reducing any of the plans' significant adverse environmental effects.

Analysis of three alternatives to the proposed plans is provided for informational purposes and to allow decision-makers to consider the proposed plans in light of hypothetical alternative planning scenarios, thereby promoting CEQA's purpose as an information disclosure statute. This analysis is guided by the following considerations set forth under CEQA Guidelines Section 15126.6:

- An EIR need not consider every conceivable alternative to a plan or project;
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process;
- Reasons for rejecting an alternative include:
 - Failure to meet most of the basic plan or project objectives;
 - Infeasibility; or
 - Inability to avoid significant environmental effects.

5.2 Significant and Unavoidable Impacts

The implementation of the proposed plans was analyzed for potentially significant impacts related to each of the environmental issues discussed in Sections 3.1 through 3.13. The results of the analysis indicate that the proposed plans would result in the following significant and unavoidable impacts:

- Air Quality: operation-related criteria pollutant emissions
- <u>Cultural and Tribal Cultural Resources:</u> construction-related historical resources
- <u>GHG Emissions and Energy</u>: operation-related GHG emissions and operation-related consistency with GHG reduction plans
- <u>Hazards, Hazardous Materials, and Wildfire</u>: operation-related excessive aviation noise exposure
- **Noise:** construction-related noise, operation-related stationary noise, construction-related vibration, and operation-related consistency with noise land use compatibility standards
- Transportation: operation-related VMT

Mitigation measures (MMs) were identified for construction-related noise, vibration, and historical resources impacts and operation-related VMT, criteria pollutant emissions, stationary noise, GHG emissions, and GHG reduction plans consistency impacts but would not reduce the impacts to less than significant. Thus, even though the proposed plans attempt to mitigate its impacts to the

greatest extent feasible as required by CEQA, the mitigation is not technically feasible or sufficient or available to reduce impacts from significant and unavoidable. In addition, no feasible mitigation is available for operation-related aviation noise exposure hazards and noise land use compatibility standards impacts.

5.3 Alternatives to the Proposed Plans

Pursuant to CEQA Guidelines Section 15126.6, this EIR presents a range of reasonable alternatives to the proposed plans for analysis and evaluation of their comparative merits. These alternatives are considered to cover the range of development alternatives that would meet the basic objectives of the plans while lessening one or more of its significant impacts. CEQA Guidelines Section 15126.6(a) states that an EIR need not evaluate every conceivable alternative. Information has been provided for each alternative that would allow meaningful comparison with the proposed plans.

The three alternatives to the proposed plans analyzed in this chapter are as follows:

- Alternative 1: Adopted General Plan Buildout
- Alternative 2: Increased Development, Height, and Density
- <u>Alternative 3:</u> Increased Residential

Table 5-1 shows the alternatives' components summary and indicates the net change from proposed plans' implementation; this EIR analyzes the net change in terms of potential physical environmental impacts. Detailed descriptions of the alternatives are included in the impact analyses for each alternative in Sections 5.5 through 5.7.

Feature	Proposed Plans	Net Change from Proposed Plans to Alternative 1	Net Change from Proposed Plans to Alternative 2	Net Change from Proposed Plans to Alternative 3
Hotel Square Feet	330,000	-200,000	0 (same)	-330,000
Hotel Number of Rooms	460	-240	0 (same)	-460
Office Square Feet	155,000	-105,000	+62,000	-16,717
General Commercial Square Feet	310,000	-225,000	+124,000	-27,672
Restaurant Square Feet	171,000	-106,000	+68,400	-15,431
Residential Number of Units	3,130	-1,880	+626	+5,226
Population Estimate 2.74 persons per household ¹	8,576	-5,151	+1,715	+14,319

Table 5-1 Alternatives Buildout Projections Summary

¹ California Department of Finance. 2022. Table E-5 Population and Housing Estimates for Cities, Counties, and the State — January 1, 2021-2022. Available: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/

5.4 Plans' Objectives

As described in Chapter 2, *Project Description*, the objectives for the 2040 General Plan and the Specific Plan are as follows:

2040 General Plan

- Promote the revitalization of El Camino Real into a "grand boulevard" that creates a welcoming gateway into Millbrae
- Improve pedestrian and bicycle mobility and enhance the streetscape along the El Camino Real corridor to create an inviting pedestrian environment
- Encourage transit-oriented, residential, and mixed-use developments along El Camino Real that create an exciting place for people to live, work, shop, and play
- Provide physical space and the infrastructure in the downtown district to captivate a mix of businesses that serve the range of resident needs and attract visitors
- Foster investments in public spaces that elevate downtown as an urban village thriving with community activity
- Support the preservation and broadening of the existing housing stock, while encouraging innovative housing types and preserving Bay views
- Provide a safe and complete transportation network that meets the needs of various users and focuses on smart, safe, and seamless transportation improvements that encourage walkability and bike-ability and increase accessibility between neighborhoods, downtown, and the Millbrae intermodal station
- Enhance Millbrae's character and reputation by creating vibrant places that bring community members together and draw visitors from the region
- Encourage Millbrae to remain an inclusive urban community with strong civic pride by improving and creating new public gathering spaces through public art, local landmarks, safety measures, and park or plaza improvements
- Encourage walking, biking, and public transportation and reduce automobile dependence, noise, and harmful air pollutants
- Strive to achieve Zero Waste and expanded electrical infrastructure, tertiary wastewater treatment, and urban forest as well as promote the efficient use of natural resources including water, energy, and land, to reduce impacts on regional watersheds
- Protect the health and safety of residents and support a high-quality living environment by maintaining infrastructure, services, and programs that meet the needs of the community
- Support increased use of technology to improve the equitable, transparent, and timely delivery
 of City services
- Foster economic growth by cultivating a diversity of businesses based on innovation, technology, and local entrepreneurship that provide high-paying jobs and increase the tax base
- Emphasize the highest and best use of land for economic development, business retention, entrepreneurship, and growth in life sciences, retail, local services, other technology sectors
- Encourage healthy lifestyles for residents and visitors by increasing opportunities for physical activity, availability of nutritious foods, quality education, realistic living wages, access to affordable healthcare and childcare, options for affordable housing, clean air and water, and a safe environment that promotes walking and biking

 Encourage active living by elevating recreational programming for persons of various ages and abilities, enhancing parks and recreation facilities, and improving bike and pedestrian connections throughout the City and into neighboring cities

Specific Plan

- Transform the city's primary areas of business and commerce into vibrant and connected mixed-use centers of cultural and economic activity
- Enhance quality of life by providing a roadmap for future growth and investment to create an exciting place for people to live, work, shop, and visit
- Emphasize transit-oriented, mixed-use development to provide a purposeful mix of housing, restaurants, retail, hotels, offices, and entertainment uses
- Provide the overarching policy framework and development regulations that are necessary to achieve the plan's vision

5.5 Alternative 1: Adopted General Plan Buildout

The *CEQA Guidelines* (Section 15126.6[e][2]) require that the alternatives discussion include an analysis of a" No Project" Alternative. Pursuant to CEQA, the "No Project" Alternative refers to the analysis of existing conditions and what would reasonably be expected to occur in the foreseeable future if the proposed plans were not approved. This is based on current plans and consistent with available infrastructure information. The "No Project" Alternative typically will proceed along one of two lines: (1) when a plan or project is a revision of an existing regulatory plan or policy, the "No Project" Alternative will be continuation of the existing plan or policy; or (2) if a plan or project is a development project on identifiable property, the "No Project" Alternative is the circumstance under which a project does not proceed. Thus, in the case of this programmatic EIR for two proposed plans, the "No Project" Alternative would be a No Plans Alternative that represents the continuation of existing zoning and General Plan designations throughout Millbrae. Full buildout under those existing designations is assumed to occur under this alternative. Typical development assumptions are included in the below analysis of this alternative, including compliance with applicable regulations or typical City-required measures.

5.5.1 Description

The Adopted General Plan Buildout Alternative (or Alternative 1) assumes that the current land use and zoning designations would not change from the City's adopted 1998 General Plan. The 2040 General Plan would not be adopted, and no Specific Plan implementation would occur. Current land uses for residential units and hotel, office, general commercial, and restaurant area would remain unchanged under Alternative 1. Future buildout would continue to follow the current designations. For purposes of the environmental analysis, it was assumed that the number of persons per household would still be 2.74.² Based on this, the population estimate would decrease by 5,151 (see Table 5.1). Alternative 1 would not fulfill plans' objectives, because it would not update the Millbrae General Plan or adopt the Downtown and El Camino Real Specific Plan. Without these plans, Millbrae would lack a long-term blueprint for redevelopment throughout the General Plan area and

² California Department of Finance. 2022. Table E-5 Population and Housing Estimates for Cities, Counties, and the State — January 1, 2021-2022. Available: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/

a roadmap for growth within the Downtown district and El Camino Real Corridor (the Specific Plan area).

5.5.2 Impact Analysis

Aesthetics

Under Alternative 1, new area for hotel, office, general commercial, restaurant, and residential uses would not be developed according to the proposed plans. Therefore, there would be no new sources of light or glare that would adversely affect daytime or nighttime views. There would also be no potential for visual character of the area to be altered, as any development under the current adopted plans would follow policies that would prevent this impact. No mitigation would be required.

The proposed plans' impacts related to aesthetics would be less than significant with mitigation (see Section 3.1, *Aesthetics*). The Adopted General Plan Buildout alternative would have a reduced level of aesthetic impacts compared to the proposed plans due to the lack of potential for glare and alterations to the area's visual character. However, this alternative would not meet the plan objectives that focus on increasing visual quality, sense of place, and overall unity of the built environmental throughout the Downtown and El Camino Real area.

Air Quality

Under Alternative 1, fewer residential units and less commercial square footage would be constructed than the proposed plans, consistent with allowed existing zoning. Temporary construction-related air quality impacts from grading and construction and long-term air quality impacts from building operation (energy usage, maintenance), would be lower than under the proposed plans. Individual future project mitigation may be required to ensure compliance with BAAQMD's current recommended basic control measures to comply with standard permit conditions.

The proposed plans' impacts related to air quality would be significant and unavoidable (see Section 3.2, Air Quality). The Adopted General Plan Buildout alternative would result in lower levels of criteria pollutant and toxic air contaminant emission generation impacts compared to the proposed plans but not to the extent of reducing the impact significance level. However, this alternative would not meet the plan objectives related to land uses in terms of air quality, as this alternative would not redevelop and increase land uses within the Downtown and El Camino Real area with more modern facilities in compliance with latest building codes and, thus, would not promote greater energy efficiency nor maximize infill development on underutilized properties in an area served by adequate infrastructure and services in proximity to a transportation corridor.

Biological, Agriculture, and Forestry Resources

Under Alternative 1, the planning area would be consistent with allowed existing zoning. Any development changes related to wildlife, habitat, and waters of the United States conservation policies would follow the current adopted General Plan guidelines. While the 2040 General Plan policy to conserve Open Space areas in the planning area would not be adopted, agricultural and forestry zones would remain unaltered. Thus, there would be no biological resources impacted under this alternative.

The proposed plans' impacts related to biological, agriculture, and forestry resources would be less than significant with mitigation (see Section 3.3, *Biological, Agriculture, and Forestry Resources*). The Adopted General Plan Buildout alternative would have a lower impact on these resources. However, this alternative would not meet the proposed plans' objectives due to the lack of policy specifications to avoid impacts to wildlife corridors by conserving Open Space areas. The proposed plans allow for conservation plans to update alongside local, regional, and government conservation policy update, which the adopted General Plan would lack.

Cultural and Tribal Cultural Resources

Under Alternative 1, the Southern Pacific Depot, 1 Lewis Avenue, and Sacred Lands are identified as Existing Cultural Resources in the General Plan area (see Section 3.4, *Cultural and Tribal Cultural Resources*). These resources would not change according to the proposed plans under this alternative, and instead would be developed consistent under current policies and zoning.

The proposed plans' impacts related to Cultural and Tribal Resources would be significant and unavoidable even after mitigation (see Section 3.4, *Cultural and Tribal Cultural Resources*). The Adopted General Plan Buildout would have reduced cultural resources impacts compared to the proposed plans. However, this alternative would not meet the plan objectives because there would be no business and commerce development that would enhance and connect mixed-used centers of cultural activity.

Geology, Soils, and Mineral Resources

Under Alternative 1, the 2040 General Plan Recreation, Arts, and Culture Element policy (RAC-4.4, Protection of Paleontological Resources) would not be implemented and therefore paleontological resources would not be protected. The Adopted General Plan Buildout alternative would have increased impacts to paleontological resources than the proposed plans.

The proposed plans' impacts related to geological, soil, and mineral resources would be less than significant with mitigation (see Section 3.5, *Geology, Soils, and Mineral Resources*). The Adopted General Plan Buildout alternative would have an increased impact level compared to the proposed plan. This is based on the lack of a paleontological resource protection policy that would have to be adopted in order to avoid future adverse impacts. This alternative would not meet plan objectives without any development or policy improvements additions.

Greenhouse Gas Emissions and Energy

Under Alternative 1, the proposed area would not be redeveloped according to the proposed plans and would instead be developed consistent with existing zoning. Any impacts to greenhouse gas emissions and energy would occur with any development under the adopted General Plan and/or as impacts occur from current population growth rates. However, similar to the proposed 2040 General Plan updates, the current adopted General Plan does not define a specific strategy as to how the City will meet the goal to reduce emissions to 40 percent below the 1990 levels by 2030. Therefore, regardless of proposed plans implementation, the BAAQMD CEQA thresholds for GHG emissions would not be met, meaning impacts would be potentially significant.

The proposed plans' impacts related to GHG emissions and energy would be significant and unavoidable (see Section 3.6, *Greenhouse Gas Emissions and Energy*). The Adopted General Plan Buildout would have a similar impact level compared to the proposed plans due to the lack of consistency with the BAAQMD CEQA thresholds for GHG emissions.

Hazards, Hazardous Materials, and Wildfire

Under Alternative 1, General and Specific Plan development would occur throughout the Downtown and El Camino Real area consistent with existing zoning. Impacts would occur based on the construction and operational activities following the current adopted General Plan. However, the General Plan area is adjacent to the San Francisco International Airport (SFO), which results in 65 CNEL or higher airport contours. Therefore, regardless of the impact levels that would come from development following current General Plan policies, noise levels would be significant.

The proposed plans' impacts related to hazards would be significant and unavoidable (see Section 3.7, *Hazards, Hazardous Materials, and Wildfire*). The Adopted General Plan Buildout would have a similar impact level compared to the proposed plans due to the area being within SFO proximity. However, it would not meet the proposed plans' objectives due to a lack of policy implementation to reduce exposure of sensitive receivers to SFO noise, which the proposed plans would incorporate.

Hydrology and Water Quality

Under Alternative 1, any ground-disturbing construction activities that could potentially affect water quality from sedimentation or accidental spills would occur following current adopted zoning. Any changes related to hydrology, water quality, watersheds and drainage patterns, flood and inundation hazards, and ground water resource management, from changes in existing development would follow the same adopted standards. Therefore, in comparison to the proposed plans, a reduced level of hydrology and water quality impacts would occur under this alternative based on current analyses.

The proposed plans' impacts related to hydrology and water quality would be less than significant (see Section 3.8, *Hydrology and Water Quality*). The Adopted General Plan Buildout would have reduced impacts on this resource compared to the proposed plans. However, this alternative would not meet the proposed plans' objectives due to the lack of hydrology and water quality enhancement that would occur by implementing the 2040 General Plan over the current 1998 adopted General Plan.

Land Use Planning, Population, and Housing

Under Alternative 1, applicable land use plans, policies, and regulations would continue to follow current zoning. However, the current adopted plan did not account for the addition of dwelling units that would come with the increase in population. This is evident from 2010 to 2021, wherein Millbrae has added fewer dwelling units than its corresponding population growth. This alternative would not include allowance for future population and development growth, which the 2040 General Plan would have.

The proposed plans' impacts related to land use and population/housing would be less than significant (see Section 3.9, *Land Use Planning, Population, and Housing*). The Adopted General Plan Buildout would have no impacts on land use and population/housing compared to the proposed plan. However, this alternative would not meet any of the proposed plans' objectives due to the lack of planning for anticipated population and development growth.

Noise

Under Alternative 1, no construction of individual future projects facilitated by the 2040 General Plan and Specific Plan would occur, meaning any development would follow current zoning. Any

temporary noise generation or level increase from 2040 General Plan-facilitated future projects would not occur. However, due to the Downtown and El Camino Real Plan Area's proximity to the SFO airport, aircrafts noises cause noise levels to be at 60 CNEL or higher, which exceeds the normally acceptable exterior noise level amounts for the City. Because of this, impacts to noise would still be significant even if no construction were to occur under the adopted plans.

The proposed plans' impacts related to noise would be significant and unavoidable (see Section 3.10, *Noise*). The Adopted General Plan Buildout would have a similar impact level related to noise compared to the proposed plans. While this alternative would not generate any new and significant noise levels, it would also not have the proposed plans' attempt to mitigate the issue and, therefore, does not meet proposed plans' objectives.

Public Services and Recreation

Under Alternative 1, the proposed plans hotel, office, general commercial, restaurant, and residential buildout would occur consistent with current zoning. The population increase resulting from this development would occur as projected, as will any increased usage of public services and recreation. Without adoption of the proposed plans, this population growth enhanced by future, unaccounted for population growth and accompanied by the increased use of public services and demand for new recreation would be unaccounted for.

The proposed plans' impacts related to public services and recreation would be less than significant (see Section 3.11, *Public Services and Recreation*). The Adopted General Plan Buildout would have no impacts compared to the proposed plans. However, this alternative would not meet the proposed plans' objectives that encourage healthy lifestyles and public space investment due to the lack of planning for increase in demand and potential new construction for public facilities.

Transportation

Under Alternative 1, any changes in VMT per capita and per employee would follow current zoning development standards. However, there would be no plans implemented to ensure VMT is reduced to below the Citywide non-residential threshold of 16.5, as the current adopted plans do not include any. Without any mitigation towards this issue, impacts on transportation would be significant.

The proposed plans' impacts related to transportation would be significant and unavoidable (see Section 3.12, *Transportation*). The Adopted General Plan Buildout would have a similar impact level of on transportation compared to the proposed plans. This is due to the lack of mitigation measures and/or plans towards reducing any future VMT increases, which also does not meet the proposed plans' objectives.

Utilities and Service Systems

Under Alternative 1, increased demand for electric power, natural gas, telecommunications, stormwater drainage, water supply, or wastewater treatment would be consistent with the projected population increase in the current adopted General Plan. There would also be an increase in demand as the City's population continues to naturally grow. The current adopted General Plan would not account for this increase in demands at the level that the proposed plans have anticipated.

The proposed plans' impacts related to utilities and service systems would be less than significant (see Section 3.13, *Utilities and Service Systems*). The Adopted General Plan Buildout would have reduced impacts compared to the proposed plans. This alternative would not meet the proposed

plans' objectives due to the lack of population increase anticipation compared to what the proposed plans have projected.

5.5.3 Conclusion

Alternative 1 would avoid the significant and unavoidable cultural resources impacts related to historical resources of the proposed plans but would not avoid the remaining significant and unavoidable air quality, GHG emissions, noise, hazards, and transportation (i.e., VMT) impacts of the proposed plans. However, this alternative would not advance the overall mixed-use and transit-oriented residential and commercial land use objectives of the proposed plans.

5.6 Alternative 2: Increased Development, Height, & Density

5.6.1 Description

The Increased Development, Height, and Density Alternative (or Alternative 2) would adopt the 2040 General Plan and Downtown and El Camino Real Specific Plan with an increase in proposed building height throughout the Specific Plan area. This would increase developmental potential above the proposed plans (or net change) as follows: office space 62,000 square feet, general commercial space 124,000 square feet, restaurant space 68,400 square feet, and 626 residential units. The maximum height of the buildings would not exceed the SFO proximity height limitations (See Table 5-1).

Alternative 2 net change calculations were based on the following assumptions:

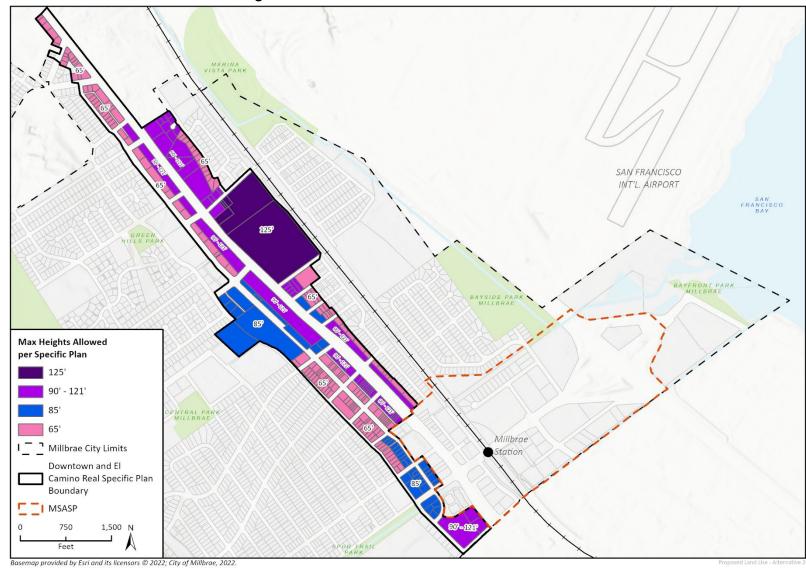
- Hotel buildout would remain the same due to the SFO height restrictions.
- Office, general commercial, and restaurant spaces would increase by four stories each.
- Residential space would increase by two stories.
- An overall one-story increase would equal to a 10 percent increase in square footage.

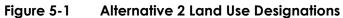
Furthermore, for purposes of the environmental analysis, it was assumed that the number of persons per household would still be 2.74.³ Based on this, the residential population estimate would increase by 1,715 under Alternative 2.

Alternative 2 would fulfill most of the proposed plans' objectives with the increase in density. However, not all of the proposed plans' objectives would be achieved, because the increased building heights would likely obstruct the Bay views that would otherwise be preserved. There would also be a potential increase in significant impacts related to air quality due to the temporary construction that would take place over time to construct any additional structures that the height increases would allow for.

Alternative 2's increase in proposed building height and density designations are depicted in Figure 5-1 below.

³ California Department of Finance. 2022. Table E-5 Population and Housing Estimates for Cities, Counties, and the State — January 1, 2021-2022. Available: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/





5.6.2 Impact Analysis

Aesthetics

Under Alternative 2, there would be an overall building height increase that would cause a potentially significant change in visual character in the corridor along El Camino Real and Broadway. The height increases would also affect the scenic vista throughout the Downtown and El Camino Real area. This alternative would require mitigation measures to comply with the proposed plans' goals and policies.

The proposed plans' impacts related to aesthetics would be less than significant with mitigation (see Section 3.1, *Aesthetics*). Alternative 2 would have a higher level of aesthetics impact compared to the proposed plans due to the increased height having adverse effects on the scenic vistas being significant and unavoidable. This alternative would not meet proposed plan objectives, because it would hinder the Downtown and El Camino Real scenic area rather than enhance it.

Air Quality

Under Alternative 2, there would be similar levels of overall traffic-related emissions. There would be a temporary increase in emissions from construction activities, but similar operational emissions.

The proposed plans' impacts related to air quality would be significant and unavoidable (see Section 3.2, *Air Quality*). Alternative 2 would have a similar level of impacts compared to the proposed plans with impacts also being significant and unavoidable due to there being no feasible mitigation measures available to further reduce VMT. However, it would likely meet proposed plans' objectives, as this alternative would adopt the proposed plans and policies that would help address air quality impacts from construction activities.

Biological, Agriculture, and Forestry Resources

Under Alternative 2, development would be required to implement the same federal, state, and local regulations to not impact agricultural, forestry, and most biological resources in the area. However, development in this area could result some direct or indirect impacts on roosting bats. The same mitigation measures (MM BIO-1 and BIO-2) would be required for development under Alternative 2 to occur.

The proposed plans' impacts related to biological resources would be less than significant with mitigation incorporated (see Section 3.3, *Biological, Agriculture, and Forestry Resources*). Alternative 2 would have a similar impact level on biological resources compared to the proposed plans. This alternative would achieve the proposed plans' objectives related to the adoption of the proposed 2040 General Plan Open Space area conservation. The mixed-use development that would result from this alternative would also meet proposed plan' objectives.

Cultural and Tribal Cultural Resources

Under Alternative 2, development to increase hotel, office, general commercial, restaurant, and residential building heights would occur. Because this development would be similar to the proposed plans, substantial adverse change in the significance of historical resources would occur to buildings over 45 years old. Such impacts would also be mitigated similar to the proposed plans by preparing historical resource evaluations to avoid significant historical resources before construction (MM CR-1), assessing archeological resources before future project approval

(MM CR-2), and stopping construction in the event of an unanticipated discovery (MM CR-3). However, even with mitigation, existing historical resources would still be materially impaired by future development and the loss of historical fabric could not be readily compensated for by commemorative mitigation.

The proposed plans' impacts related to Cultural and Tribal Resources would be significant and unavoidable with mitigation incorporated (see Section 3.4, *Cultural and Tribal Cultural Resources*). Alternative 2 would have a similar level of significant and unavoidable resource impacts like the proposed plans. However, this alternative would not meet most of the proposed plans' objectives, as the potential increase in development potential would likely result in more significant and adverse impacts requiring further analysis.

Geology, Soils, and Mineral Resources

Under Alternative 2, construction similar to the proposed plans activities would occur to achieve potential buildout from building increased heights. Construction would occur on the General Plan area, which is mostly underlain by Holocene-aged sediments which are further underlain by older, higher sensitivity sediments at unknown subsurface depths. Therefore, these paleontological resources would experience ground-disturbing activity due to construction efforts, which has the potential to adverse impact the sediments. However, this alternative includes the adoption of the proposed plans' mitigation measures to incorporate a paleontological resources protection policy (MM GEO-1).

The proposed plans' impacts related to geological, soil, and mineral resources would be less than significant with mitigation incorporated (see Section 3.5, *Geology, Soils, and Mineral Resources*). Alternative 2 would have a similar level of geological, soil, and mineral resource impacts compared to the proposed plans with MM GEO-1 implemented. Incorporation of the proposed plans and its mitigation measures would help this alternative meet proposed plans' objectives accordingly.

Greenhouse Gas Emissions and Energy

Under Alternative 2, there would be construction activities that would occur in order to increase building heights throughout the Downtown and El Camino Real area. While this alternative would adopt the GHG mitigation measures from the proposed plans, there would still not be a defined strategy as to how the City would meet the goal to reduce emissions to 40 percent below the 1990 levels by 2030. Without a clearly defined outline for this goal, the BAAQMD CEQA thresholds for GHG emissions would not be met, meaning impacts would be potentially significant.

The proposed plans' impacts related to GHG emissions and energy would be significant and unavoidable (see Section 3.6, *Greenhouse Gas Emissions and Energy*). Alternative 2 would have a similar impact level compared to the proposed plans due to the lack of consistency with the BAAQMD CEQA thresholds for GHG emissions. Without this, proposed plan's objectives would not be met.

Hazards, Hazardous Materials, and Wildfire

Under Alternative 2, development of increased building heights would occur throughout the proposed area. Alternative 2 would adopt the proposed plans which would avoid significant hazards from hazardous material transportation, emission, and/or exposure during construction and operational activities. However, this alternative would be implemented within close proximity to SFO. While this alternative would adopt the 2040 General Plan policies to reduce sensitive receivers'

exposure to SFO noise, the 65 CNEL or higher airport contours would remain due to the exposure of sensitive receivers to high noise levels from an elevated position caused by Alternative 2's increased height buildout.

The proposed plans' impacts related to hazards would be significant and unavoidable (see Section 3.7, *Hazards, Hazardous Materials, and Wildfire*). Alternative 2 would have a similar impact level compared to the proposed plans due close proximity to SFO, which in turn affects the proposed heights increasing the buildings because of the elevated position making it unable to avoid high noise levels from the airport. Alternative 2 would be found to meet proposed plans' objectives with the adoption of the proposed plans and their policies.

Hydrology and Water Quality

Under Alternative 2, construction to develop buildouts similar to the proposed plans with increased height would occur. This similarity in construction plans would also result in the similar potential effect on hydrology, water quality, watersheds and drainage patterns, flood and inundation hazards, and ground water resource management. However, Alternative 2's General Plan adoption would alleviate existing problems with planned hydrology improvements. Alternative 2 would also adhere to applicable water quality standards throughout construction and operation.

The proposed plans' impacts related to hydrology and water quality would be less than significant (see Section 3.8, *Hydrology and Water Quality*). Alternative 2 would have a similar impact level of less than significant. This alternative would meet proposed plans' objectives, as it would implement the 2040 General Plan policies to achieve Zero Waste and promote efficient use of natural resources such as water.

Land Use Planning, Population, and Housing

Under Alternative 2, development including increased building heights would occur and would be generally consistent with applicable land use plans, policies, and regulations. The increase in density through increased height instead of additional building development would avoid any physical divide in community areas and potential displacement. Alternative 2 would also adopt the proposed plans, which would accommodate and plan for population growth and any development that would come with that.

The proposed plans' impacts related to land use and population/housing would be less than significant (see Section 3.9, *Land Use Planning, Population, and Housing*). Alternative 2 would have a similar impact level compared to the proposed plans. This alternative would meet plan objectives identified for residential and other mixed-use development.

Noise

Under Alternative 2, construction to increase building heights throughout the proposed area would occur, likely causing new noise sources due to the activities. While this alternative would adopt the proposed plans' mitigation measures to reduce new noise production, impacts on noise would still be significant due to the Downtown and El Camino Real's close proximity to the SFO airport.

The proposed plans' impacts related to noise would be significant and unavoidable (see Section 3.10, *Noise*). Alternative 2 would have a similar significance level compared to the proposed plans due to noise from SFO keeping levels at 60 CNEL or higher, which exceeds the normally acceptable exterior noise level amounts for the City. This alternative would meet the proposed plans' objectives to manage noise increase with implementation of the proposed plans.

Public Services and Recreation

Under Alternative 2, the development that would occur for the proposed plans with increased building heights would cause a population increase. This increase would result in a higher demand for old and new public services and recreation. However, Alternative 2 would allow for a larger population increase than the proposed plans would have projected. Because of this, implementation of this alternative would require mitigation measure to avoid significant and unavoidable impacts to public services and recreation. The proposed plan does not have any mitigation measures under this impact, so measures would have to created.

The proposed plans' impacts related to public services and recreation would be less than significant (see Section 3.11, *Public Services and Recreation*). Alternative 2 would have a greater impact level compared to the proposed plans that would not require mitigation in order to be less than significant. This alternative would foster public space investment and increase that would meet the proposed plans' objectives. However, the additional increase in public services and recreational facilities that would occur from this alternative could potentially hinder pedestrian and bicycle mobility rather than improve it.

Transportation

Under Alternative 2, there would be an increase in building heights which may lead to a decrease in VMT per capita and employee as people move into these new spaces for work and living purposes. While this could lead to a decrease in overall VMT, there is still uncertainty over what future projects facilitated by this alternative with the adopted proposed plans and how future conditions may impact VMT. While the proposed plans would incorporate TDM Programs (MM TRA-2), there is still uncertainty of guaranteed reduction Citywide non-residential VMT per employee threshold of 16.5. Therefore, impacts would have potential to be significant.

The proposed plans' impacts related to transportation would be significant and unavoidable (see Section 3.12, *Transportation*). Alternative 2 would have a similar level of significant and unavoidable impacts compared to the proposed plans due to the uncertainty of TDM Programs to lower and keep VMT below the 16.5 threshold. Although the mitigation measures would be in place, this alternative would not meet the proposed plans' objectives without assurance of VMT reduction.

Utilities and Service Systems

Under Alternative 2, there would be in an increase in demand for electric power, natural gas, telecommunications, stormwater drainage, water supply, and wastewater treatment resulting from this alternative's proposed development. While the General Plan adoption would account for a majority of this demand, this alternative could result in a larger, unanticipated increase due to the extra buildout that increasing building heights would allow for. Therefore, this plan would require the creation of a mitigation measure, as the proposed plan does not list any. This mitigation measure would have to account for an extra increase in demand for utilities and service systems throughout the General Plan area.

The proposed plans' impacts related to utilities and service systems would be less than significant (see Section 3.13, *Utilities and Service Systems*). Alternative 2 would have a greater impact level compared to the proposed plans due to the need for mitigation incorporation to keep impacts at a less than significant level. This alternative would not meet proposed plans' objectives due to the increase in demand that may not achieve Zero Waste or expand utility services. However, this could change depending on the mitigation measures created.

5.6.3 Conclusion

Alternative 2 would not avoid the significant and unavoidable air quality, cultural resources (i.e., historical resources), GHG emissions, noise, hazards, and transportation (i.e., VMT) impacts of the proposed plans and would also result in an additional significant and unavoidable aesthetics impact related to the scenic vista throughout the Downtown and El Camino Real area. However, this alternative would advance the overall mixed-use and transit-oriented residential and commercial land use objectives of the proposed plans.

5.7 Alternative 3: Increased Residential

5.7.1 Description

The Increased Residential Alternative (or Alternative 3) would increase residential buildout by reducing restaurant, office, and general commercial square footage and eliminating all hotel development throughout the General Plan and Specific Plan areas. The reduced restaurant, office, and other commercial use areas would be rezoned for 100 percent residential use. Areas not rezoned would remain under their original designations but be at a smaller density due to any non-residential area being either reduced or eliminated. As a result, the net change would involve a decrease in hotel land use area and number of rooms by 330,000 square feet and 460 rooms, office land use area by 16,717 square feet, general commercial land use area by 27,672 square feet, and restaurant land use area by 15,431 square feet (see Table 5.1).

Alternative 3 net change calculations were based on the following assumptions:

- Density equated to 80 units per acre.
- The buildout would not alter the existing Commercial Mixed-Use area of Safeway (CMU-8). This
 is based on the assumption that this area is unlikely to be repurposed for residential
 development due to its community importance. However, this resulted in only 5.28 acres of
 Commercial Preference area remaining. This is what helped determined the square footage of
 the office and restaurant areas, although it was not entirely based off of this.
- The areas designated as Residential Focused Mixed Use would mostly be used as Residential Only. However, approximately one acre was allocated towards the Commercial Preference area as leeway for development.

Furthermore, for purposes of the environmental analysis, it was assumed that the number of persons per household would still be 2.74.⁴ Based on this, there would be a 14,319-population increase under Alternative 3.

Making the plan areas more resident-centered would allow for buildout potential to meet the plans' objectives related to residential-focused goals. There would also be a decrease in reliance on private vehicles and increase in multi-modal transportation with residents living in proximity to jobs and services. This would achieve the plans' objectives focused on reducing automobile dependance and encouraging walking. However, the 2040 General Plan goal to draw in visitors may not be met, because the lack of hotel space would make it difficult for visitors to stay in the area for more than a day. This could also lead to an increase in incoming and outgoing traffic from visitors, which would

⁴ California Department of Finance. 2022. Table E-5 Population and Housing Estimates for Cities, Counties, and the State — January 1, 2021-2022. Available: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/

impact clean air due to the increase in mobile air pollutants. The lack of hotel space would also impact the plans' objectives focused on mixed-use development, due to the decrease in land use type and developmental variety.

Alternative 3's increase in residential units through hotel elimination and restaurant, office, and general area reduction designations are depicted in Figure 5-2 below.

5.7.2 Impact Analysis

Aesthetics

Under Alternative 3, the proposed plans would heavily focus on residential buildout, eliminate hotel area, and limit buildout on office, general commercial, and restaurant square footage. There would be changes in visual character, views, nighttime lighting, and shadow, as there would be an addition of residential uses on-site that do not currently exist. This would result an impact that would be less than significant with MM AES-1 incorporated into the alternative.

The proposed plans' impacts related to aesthetics would be less than significant with mitigation (see Section 3.1, *Aesthetics*). Alternative 3 would have a similar level of aesthetics impact caused by light and glare compared to the proposed plans. This alternative would adhere to the residential-focused plan objectives but would ultimately not meet the plans goals due to the lack of mixed-use development that would enhance urbanized area scenic quality.

Air Quality

Under Alternative 3, there would be an increase in residential development that would lead to a noticeable increase in traffic-related emissions from visitors due to the decrease in hotel area. However, this could be countered with the decrease in incoming traffic due to work-related commutes as people who work in the area would likely move into the newly available residential units. Therefore, there would be a temporary increase in emissions from construction activities, but a potential long-term result in increased emissions from traffic flow.

The proposed plans' impacts related to air quality would be significant and unavoidable (see Section 3.2, *Air Quality*). Alternative 3 would have an equal level of impacts compared to the proposed plans due to there being no feasible mitigation measures available to further reduce VMT and, thus, associated emissions. Without these measures, the proposed plans' objectives would not be met.

Biological, Agriculture, and Forestry Resources

Under Alternative 3, residential-focused development would occur throughout General Plan area. This alternative would follow the same federal, state, and local regulations and plans that the proposed plans would follow in order to not impact any agricultural, forestry, and most biological resources in the area. However, development in this area could cause direct or indirect impacts on roosting bats. The same pre-construction bird surveys (MM BIO-1) and roosting bat surveys (MM BIO-2) mitigation measures would be required for development under Alternative 3 to occur.

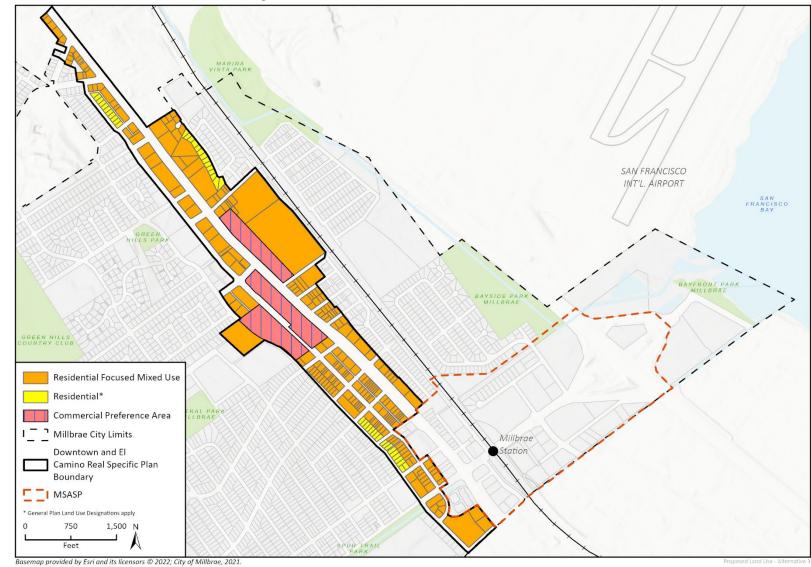


Figure 5-2 Alternative 3 Land Use Designations

The proposed plans' impacts related to biological resources would be less than significant with mitigation incorporated (see Section 3.3, *Biological, Agriculture, and Forestry Resources*). Alternative 3 would have a similar level of impact related to biological resources compared to the proposed plans. This alternative would achieve the proposed plans' objectives due to the adoption of the 2040 General Plan Open Space area conservation. Residential-focused objectives would also be achieved with this alternative.

Cultural and Tribal Cultural Resources

Under Alternative 3, construction similar to the proposed plans' projections would occur, but would develop more residential units than any other development. Therefore, substantial adverse change on historical resources identified as buildings over 45 years old would occur. The proposed plans' mitigation measure could be implemented by preparing historical resource evaluations to avoid significant historical resources before construction (MM CR-1), assessing archeological resources before future project approval (MM CR-2), and stopping construction in the event of an unanticipated discovery (MM CR-3). However, even with mitigation implementation, existing historical resources would still be materially impaired by future development and the loss of historical fabric could not be readily compensated for by commemorative mitigation. It is likely that there would be an increase in significant adverse impacts if the rezoning efforts affect the Southern Pacific Depot, 1 Lewis Avenue, and Sacred Lands identified as Existing Cultural Resources).

The proposed plans' impacts related to Cultural and Tribal Resources would be significant and unavoidable (see Section 3.4, *Cultural and Tribal Cultural Resources*). Alternative 3 would have a similar level of significant and unavoidable resource impacts compared to the proposed plans. However, this alternative would not meet most of the proposed plans' objectives, as the potential rezoning and redevelopment impacts on significant existing cultural resources would potentially result in greater significant and adverse impacts requiring further analysis.

Geology, Soils, and Mineral Resources

Under Alternative 3, increased residential buildout construction would occur throughout the General Plan area, which is mostly underlain by Holocene-aged sediments which are further underlain by older, higher sensitivity sediments at unknown subsurface depths. Therefore, these paleontological resources would experience ground-disturbing activity from the alternative's increased development and new construction, which would adversely impact the sediments. However, the proposed plans include mitigation measures that would involve the adoption of a paleontological resources protection policy (MM GEO-1).

The proposed plans' impacts related to geological, soil, and mineral resources would be less than significant with mitigation incorporated (see Section 3.5, *Geology, Soils, and Mineral Resources*). Alternative 3 would have a similar level of geological, soil, and mineral resource impacts compared to the proposed plans with MM GEO-1 implemented. Implementing the proposed plans and its mitigation measures would help meet the proposed plans' objectives.

Greenhouse Gas Emissions and Energy

Under Alternative 3, construction activities to redevelop the proposed area for increased residential buildout and decreased mixed-use area would take place. While this alternative would adopt the GHG mitigation measures from the proposed plans to combat any impacts, there would still be the

issue of there being no defined strategy as to how the City would meet the goal to reduce emissions to 40 percent below the 1990 levels by 2030. Without a clearly defined outline for this goal, the BAAQMD CEQA thresholds for GHG emissions would not be met, meaning impacts would be potentially significant.

The proposed plans' impacts related to GHG emissions and energy would be significant and unavoidable (see Section 3.6, *Greenhouse Gas Emissions and Energy*). Alternative 3 would have a similar impact level compared to the proposed plans due to the lack of consistency with the BAAQMD CEQA thresholds for GHG emissions. Without specification, proposed plans' objectives would not be met.

Hazards, Hazardous Materials, and Wildfire

Under Alternative 3, increased residential development would occur throughout the proposed area. Construction plans and operational activities would likely follow guidelines and regulations to avoid significant effects from hazardous material transportation, emission, and/or exposure. However, this alternative would be implemented within close proximity of SFO. While this alternative could adopt the 2040 General Plan policies to reduce sensitive receivers' exposure to SFO noise, the 65 CNEL or higher airport contours would remain at that significant level due to the exposure of sensitive receivers to high noise levels caused by close proximity to SFO.

The proposed plans' impacts related to hazards would be significant and unavoidable (see Section 3.7, *Hazards, Hazardous Materials, and Wildfire*). Alternative 3 would have a similar impact level compared to the proposed plans due to the area being within close proximity to SFO. Alternative 3 would meet plan objectives with policy incorporation.

Hydrology and Water Quality

Under Alternative 3, plans to achieve an increase in residential development, elimination of hotel area, and reduction in office, general commercial, and restaurant areas would be implemented. Water quality standards, drainage patterns, flood and inundation hazards, and water management plans would not be altered. There would be a potential for groundwater supplies to be altered since eliminating hotel area would reduce the amount of water usage, while the large increase in residential development would increase the amount again. However, the Westside Groundwater Basin that supplies the entire General Plan area is not over drafted, which would mean that impacts to groundwater supplies would be less than significant.

The proposed plans' impacts related to hydrology and water quality would be less than significant (see Section 3.8, *Hydrology and Water Quality*). Alternative 3 would have a similar impact level on these resources. This alternative would meet proposed plans' objectives to maintain clean water availability and promote its efficient use with the implementation of the proposed plans.

Land Use Planning, Population, and Housing

Increased residential development would occur under Alternative 3 due to the elimination of hotel area and significant decrease in office, general commercial, and restaurant space. This change in development would also result in a change of zoning designation, which would not fully align with the land use plans, policies, and regulations currently in place. However, this impact could be mitigated with the incorporation of a mitigation measure to adopt a policy to allow for zoning changes to fit with the land use updates. There are currently no land use mitigation measures listed

in the proposed plans, so this alternative would have to create one in order to ensure that impacts remain less than significant.

The proposed plans' impacts related to land use would be less than significant (see Section 3.9, *Land Use Planning, Population, and Housing*). Alternative 3 would have a greater level of land use and population/housing impacts due to the need for a mitigation measure to keep impacts at a less-than-significant level. This alternative would achieve the residential-focused proposed plans' objectives but would not achieve developmental variety that the proposed plans aim for.

Noise

Under Alternative 3, construction to transform the buildout into mostly residential areas would occur, causing new noise sources due to the activities. While this alternative would adopt the proposed plans' mitigation measures to reduce new noise production, impacts on noise would still be significant due to the close proximity of the Specific Plan area to the SFO airport.

The proposed plans' impacts related to noise would be significant and unavoidable (see Section 3.10, *Noise*). Alternative 3 would have a similar significance level compared to the proposed plans due to noise from SFO keeping levels at 60 CNEL or higher, which exceeds the normally acceptable exterior noise level amounts for the City. The incorporation of the proposed plans would help meet the proposed plans' objectives.

Public Services and Recreation

Alternative 3's increase in residential development would result in an equal amount of population increase throughout the General Plan area. The adoption of the proposed plans would account for the results of a population increase, including the increase demand and usage of public services and recreation. Compliance with the General Plan and Specific Plan policies would reduce any potential impacts from the increases.

The proposed plans' impacts related to public services and recreation would be less than significant (see Section 3.11, *Public Services and Recreation*). Alternative 3 would have a similar impact level compared to the proposed plans. It would also meet the proposed plans' objectives focused on public space investments. However, it would not meet proposed plans' objectives focused on drawing in visitors due to the lack of hotel space.

Transportation

Under Alternative 3, there would be an increase in residents due to the increase in residential buildout, which includes an increase in residential employees. This would likely lead to a decrease in VMT per capita and employee as people move into these new spaces for work and living purposes. While this could lead to a decrease in overall VMT, there is still uncertainty over what future projects facilitated by this alternative with the adopted proposed plans and how future conditions may impact VMT. While the proposed plans would incorporate TDM Programs (MM TRA-2), there is still uncertainty of guaranteed reduction Citywide non-residential VMT per employee threshold of 16.5. Therefore, impacts would have potential to be significant.

The proposed plans' impacts related to transportation would be significant and unavoidable (see Section 3.12, *Transportation*). Alternative 3 would have a similar level of significant impacts compared to the proposed plans due to the uncertainty of TDM Programs to lower and keep VMT below the 16.5 threshold. Due to this uncertainty, proposed plans' objectives would not be met.

Utilities and Service Systems

Under Alternative 3, development would be similar to the proposed plans' development, which would result in a similar demand increase for electric power, natural gas, telecommunications, stormwater drainage, water supply, and wastewater treatment. The adoption of the 2040 General Plan would account for this increase in demand, as the change in development under this alternative would likely still fall under the proposed plans' projections.

The proposed plans' impacts related to utilities and service systems would be less than significant (see Section 3.13, *Utilities and Service Systems*). Alternative 3 would have a similar impact level to the proposed plans. This alternative would meet proposed plans' objectives focused on expanding and promoting efficient use of natural resources.

5.7.3 Conclusion

Alternative 3 would not avoid the significant and unavoidable air quality, cultural resources (i.e., historical resources), GHG emissions, noise, hazards, and transportation (i.e., VMT) impacts of the proposed plans and would also result in a greater level of land use impacts due to the need for a mitigation measure to keep impacts at a less-than-significant level. While this alternative would advance the overall transit-oriented residential and commercial land use objectives of the proposed plans, it would not advance the overall mixed-use objective of the proposed plans.

5.8 Alternatives Considered but Rejected

The following summarizes alternatives considered, but ultimately rejected for inclusion in the analysis, because they would not meet most of the proposed plans' objectives, would not substantially reduce impacts compared to the proposed plans, or were determined to be infeasible.

- 1. The City considered a potential "all residential" alternative that would significantly increase the amount of residential space throughout the Downtown and El Camino Real Specific Plan area but eliminate all other type of land use development. Areas currently used for hotel, office, general commercial, and restaurant use would be converted into residential units. This potential alternative would meet the proposed plans' objectives to enhance residential living but would not achieve mixed-used development objectives and would likely discourage visitors. It could also increase vehicle trips and miles traveled, as residents may need to drive further to access commercial goods and services, as they would be located outside the Plan Area. The potential alternative would also lead to additional significant impacts in other resource areas, such as Air Quality in the short term and Transportation in the long term.
- 2. The City considered a potential alternative that would convert existing office spaces into residential use. Buildouts would follow a plan similar to Alternative 3 but convert office spaces instead of hotel area. This potential alternative would meet proposed plans' objectives to prioritize residential spaces but would significantly affect local businesses, which could in turn hinder economic growth for Millbrae. It could also increase vehicle trips and miles traveled, as residents may need to drive further to access offices and employment centers, as they would be located outside the Plan Area.
- 3. The City considered the creation of live-work spaces as a potential alternative. Residential and office spaces would be combined as live-in workspaces. This would decrease office area density but increase residential density. This potential alternative would meet proposed plans' objectives to broaden existing housing stock, encourage innovative housing types, and likely

reduce impacts related to transportation. However, this potential alternative would not include any improvements towards bike-ability and accessibility throughout the Downtown and El Camino Real Specific Plan area. While residential-centered objectives may be met, this potential alternative would not focus on other proposed plans' objectives necessary to achieve the desired outcome.

5.9 **Environmentally Superior Alternative**

CEQA Guidelines Section 15126(e)(2) requires identification of an environmentally superior alternative. If the "No Project" Alternative is environmentally superior, CEQA requires selection of the "environmentally superior alternative other than the No Project Alternative" from among the proposed plans and the alternatives evaluated.

Alternative Impacts and Meeting Objectives Comparison 5.9.1

To identify the environmentally superior alternative in accordance with the CEQA Guidelines, Table 5-2 presents a comparison of the impacts related to the alternatives and indicates whether each alternative's environmental impact is greater than, lesser than, or similar to that of the proposed plans for each of the topic areas that were analyzed.

Issue	Proposed Plans Impact Classification	Alternative 1: Adopted General Plan Buildout	Alternative 2: Increased Development, Height, and Density	Alternative 3: Increased Residential
Aesthetics	LTSM	LTS (Lesser)	SU (Greater)	LTSM (Similar)
Air Quality	SU	SU (Similar)	SU (Similar)	SU (Similar)
Biological, Agriculture, and Forestry Resources	LTSM	NI (Lesser)	LTSM (Similar)	LTSM (Similar)
Cultural and Tribal Cultural Resources	SU	LTS (Lesser)	SU (Similar)	SU (Similar)
Geology/Soils and Mineral Resources	LTSM	LTSM (Similar)	LTSM (Similar)	LTSM (Similar)
Greenhouse Gas Emissions and Energy	SU	SU (Similar)	SU (Similar)	SU (Similar)
Hazards, Hazardous Materials, and Wildfire	SU	SU (Similar)	SU (Similar)	SU (Similar)
Hydrology and Water Quality	LTS	NI (Lesser)	LTS (Similar)	LTS (Similar)
Land Use/Planning and Population/Housing	LTS	NI (Lesser)	LTS (Similar)	LTSM (Greater)
Noise	SU	SU (Similar)	SU (Similar)	SU (Similar)
Public Services and Recreation	LTS	NI (Lesser)	LTSM (Greater)	LTS (Similar)
Transportation	SU	SU (Similar)	SU (Similar)	SU (Similar)
Utilities and Service Systems	LTS	NI (Lesser)	LTSM (Greater)	LTS (Similar)

Table 5-2 Summary of Alternatives' Impacts

NI = No Impact

LTS = Less than Significant

LTSM = Less than Significant with Mitigation

SU = Significant and Unavoidable

<u>Alternative 1:</u> The Buildout of Adopted General Plan Alternative would generally result in lesser impacts compared to the proposed plans (see Table 5-2). By not having any planned construction or new operational activities, Alternative 1 would reduce impacts related to aesthetics, biological resources, cultural and tribal cultural, hydrology and water quality, land use and planning, public services and recreation, and utilities and service systems. Alternative 1 would have similar impact levels to the proposed plans related to air quality, geology and soils, greenhouse gas and energy, hazards and hazardous materials, noise, and transportation impacts. However, this alternative would not meet the plans' objectives, as it would not increase the residential and community opportunities or encourage the development of housing in the proposed area. It would also not incorporate any of the mitigation or preventative measures that the proposed plans would incorporate.

<u>Alternative 2:</u> The Increased Development, Height, and Density Alternative would generally result in similar or incrementally increased environmental impacts compared to the proposed plans (see Table 5-2). By allowing for commercial land uses to remain alongside residential uses with both having increased capacities, Alternative 2 would prevent VMT per capita from increasing. However, due to the increase in population and increased building height and envelope, Alternative 2 would create greater impacts related to aesthetics, public services and recreation, and utilities and service systems compared to the proposed plans.

<u>Alternative 3:</u> The Increased Residential Alternative would generally result in overall similar environmental impacts compared to the proposed plans (see Table 5-2). However, due to the significant increase in population from the increased residential availability, Alternative 3 would result in greater impacts related to land use and planning compared to the proposed plans.

5.9.2 Identification of Environmentally Superior Alternative

Based on the alternatives analysis provided in this section, the Adopted General Plan Buildout Alternative (or Alternative 1) is the environmentally superior alternative, as it would either be similar to or lessen the severity of most impacts of the proposed plans. However, it would not meet proposed plans' objectives without any development or policy additions regarding improvements. If the "No Project" Alternative is determined to avoid or reduce more impacts than any other alternative, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives (*CEQA Guidelines* Section 15126.6[e]).

The Increased Development, Height, and Density Alternative (Alternative 2) would have greater impacts on more resources compared to Alternative 3. Comparatively, while most Alternative 3 impacts are similar in significance to the proposed plans, Alternative 3 would also meet all of the proposed plans' objectives with the exception of increasing mixed-use areas. Therefore, of the other alternatives evaluated in this EIR, the Increased Residential Alternative (Alternative 3) would be the environmentally superior alternative.

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6 Contributors/Preparers

6.1 EIR Contributors

Millbrae Community Development Department

Nestor Guevara, Associate Planner Roscoe Mata, Planning Manager Darcy Smith, Community Development Director

Millbrae Public Works Department

Harry Burrowes, Acting City Engineer Craig Centis, Interim Public Works Director

Millbrae Recreation Department

Mackenzie Brady, Recreation Director

Central County Fire Department

Bruce Barron, Fire Chief Christine Reed, Battalion Chief/Fire Marshal

Millbrae City Police Department

Christina Corpus, Chief of Police Services

Millbrae School District

Claudia Buttigieg, Administrative Assistant to the Superintendent

San Mateo Union High School District

Charlene Aquino, Administrative Assistant to the Superintendent

San Mateo County Libraries

Rachel Evans, Librarian

City Attorney

Joan L. Cassman, City Attorney Michael N. Conneran, Assistant City Attorney Ellis F. Raskin, Attorney

6.2 EIR Preparers

This EIR was prepared by the City of Millbrae, with the assistance of Rincon Consultants, Inc. Consultant staff involved in the preparation of the EIR and associated transportation impact analysis (TIA) technical study are listed below.

RINCON CONSULTANTS, INC. (EIR PREPARER)

Kelsey Bennett, Senior Project Manager, Principal Environmental Planner, & GHG Specialist Leslie Trejo, Assistant Project Manager & Environmental Planner Darcy Kremin, Project Director Abe Leider, QA/QC Jesse Voremberg, Environmental Analyst Gianna Meschi, Environmental Planner Kayleigh Limbach, Environmental Analyst Lyndsey Baughman, Environmental Analyst Lynette Leighton, Senior Environmental Planner Aubrey Mescher, Senior Environmental Planner Bill Vosti, Air Quality, GHG, and Noise Specialist Beth Wilson, Biologist Kristin Asmus, Senior Biologist JulieAnn Murphy, Architectural Historian Leanna Flaherty, Archeologist Allysen Valencia, Graphics Specialist Audrey Brown, GIS Specialist Max Antono, GIS Specialist Luis Apolinar, Publishing Specialist

KITTELSON & ASSOCIATES, INC. (TIA PREPARER)

Michael Aronson, TIA Manager Matt Braughton, TIA Planner Damian Stefanakis, TIA Principal