1100 El Camino Real Project

Sustainable Communities Environmental Assessment

Lead Agency:

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Acronyms and Abbreviations

µg/m^3	micrograms per cubic meter
AB	Assembly Bill
ABAG	Association of Bay Area Government
ADT	average daily traffic
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
AFY	acre-feet per year
AIA	Airport Influence Area
applicant	Anton Development Company
AQP	air quality plan
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
bgs	below ground surface
BMP	best management practice
C	Commercial
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CALGREEN	California Green Building Standards
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CALUCP	Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport
CAP	Climate Action Plan, City of Millbrae
CARB	California Air Resources Board
CCFD	Central County Fire Department
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CH_4	methane
City	City of Millbrae
CMRA	Construction Materials Recycling Association
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
cy	cubic yards
dB	decibel
dBA	A-weighted sound level
DOC	California Department of Conservation

DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
du	dwelling units
du/ac	dwelling units per acre
DWR	California Department of Water Resources
DWWR	Department of Water and Wastewater Resources
ECR	El Camino Real
EIR	environmental impact report
ENGEO	Engeo Incorporated
ESA	Environmental Site Assessment
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FGC	Fish and Game Code
GHG	greenhouse gas
gpd	gallons per day
gsf	gross square feet
HCP	Habitat Conservation Plan
HFC	hydrofluorocarbon
HI	Hazard Index
hp	horsepower
KBTU	1,000 British Thermal Units
ksf	1,000 square feet
kWh	kilowatt-hour
lbs	pounds
lbs/day	pounds per day
Ldn	day-night sound level
Leq	equivalent sound level
Lmax	maximum sound level
Lmin	minimum sound level
LOS	level of service
MEI	maximally exposed individual
MG	million gallons
mg/m^3	milligrams per cubic meter
MGD	million gallons per day
mph	miles per hour
MRP	San Mateo County Municipal Regional Stormwater Permit
MRZ	Mineral Resource Zone
$MMTCO_2e$	million metric tons of carbon dioxide equivalent
$MTCO_2e$	metric tons of carbon dioxide equivalent
$MTCO_2e/SP/yr$	metric tons of carbon dioxide equivalent per service population per year
$MTCO_2e/yr$	metric tons of carbon dioxide equivalent per year
MTC	Metropolitan Transportation Commission
Muni	San Francisco Municipal Railway
NAHC	Native American Heritage Commission
N_2O	nitrous oxide

NCCP	Natural Community Conservation Plan
NO_2	nitrogen dioxide
NOA	naturally occurring asbestos
NO_X	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
PDA	Priority Development Area
PFC	perfluorinated chemical
PG&E	Pacific Gas and Electric Company
Plan Bay Area	Plan Bay Area 2040
PM	particulate matter
$PM_{2.5}$	particulate matter 2.5 microns in diameter or less
PM_{10}	particulate matter 10 microns in diameter or less
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
proposed project	1100 El Camino Real Project
R-3	Multi-Family Residential District
RAMP	Regional Advance Mitigation Planning
ROG	reactive organic gases
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCEA	Sustainable Communities Environmental Assessment
SCS	Sustainable Community Strategy
sf	square feet
SF_6	sulfur hexafluoride
SFBAAB	San Francisco Bay Area Air Basin
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SIP	State Implementation Plan
SMCWPPP	San Mateo Countywide Water Pollution Prevention Plan
SMCSO	San Mateo County Sheriff's Office
SO_2	sulfur dioxide
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	Tribal Cultural Resources
TDM	Transportation Demand Management
TIA	Transportation Impact Analysis
tpy	trips per year
UBC	Universal Building Code
USCB	United States Census Bureau
USEPA	Environmental Protection Agency

USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VDECS	Verified Diesel Emissions Control Strategy
VMT	vehicle miles traveled
WPCP	Millbrae Water Pollution Control Plant
ZEV	zero-emissions vehicle

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Chapter 1
Introduction

Anton Development Company (applicant) is proposing the 1100 El Camino Real Project (proposed project) in the City of Millbrae (City) (Figure 1). The proposed project involves the redevelopment of a 6.7-acre site that is located near the intersection of El Camino Real and Center Street. The project site is currently developed with the Best Western El Rancho Inn and Suites hotel (El Rancho Inn) and two residential buildings containing eight (8) housing units that are surrounded by surface parking. The applicant currently has a planning entitlement development application on file with the City to construct a new five-story apartment complex and parking garage on 5.5 acres of the site. The applicant may also include the future development of a seven-story hotel on the remaining 1.2 acres of the project site, which would occur under a separate development application. However, for purposes of this Sustainable Communities Environmental Assessment (SCEA) the analysis considers the development of the proposed apartment complex and the future hotel on the project site.

1.1 Project Title

1100 El Camino Real Project

1.2 Lead Agency

City of Millbrae, Planning Division
621 Magnolia Avenue
Millbrae, CA 94030

1.3 Lead Agency Contact

Sam Fielding, Senior Planner
Planning Division
621 Magnolia Avenue
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1.4 Project Applicant

Anton Development Company
1676 N. California Blvd, Suite 250
Walnut Creek, CA 94596

1.5 Purpose

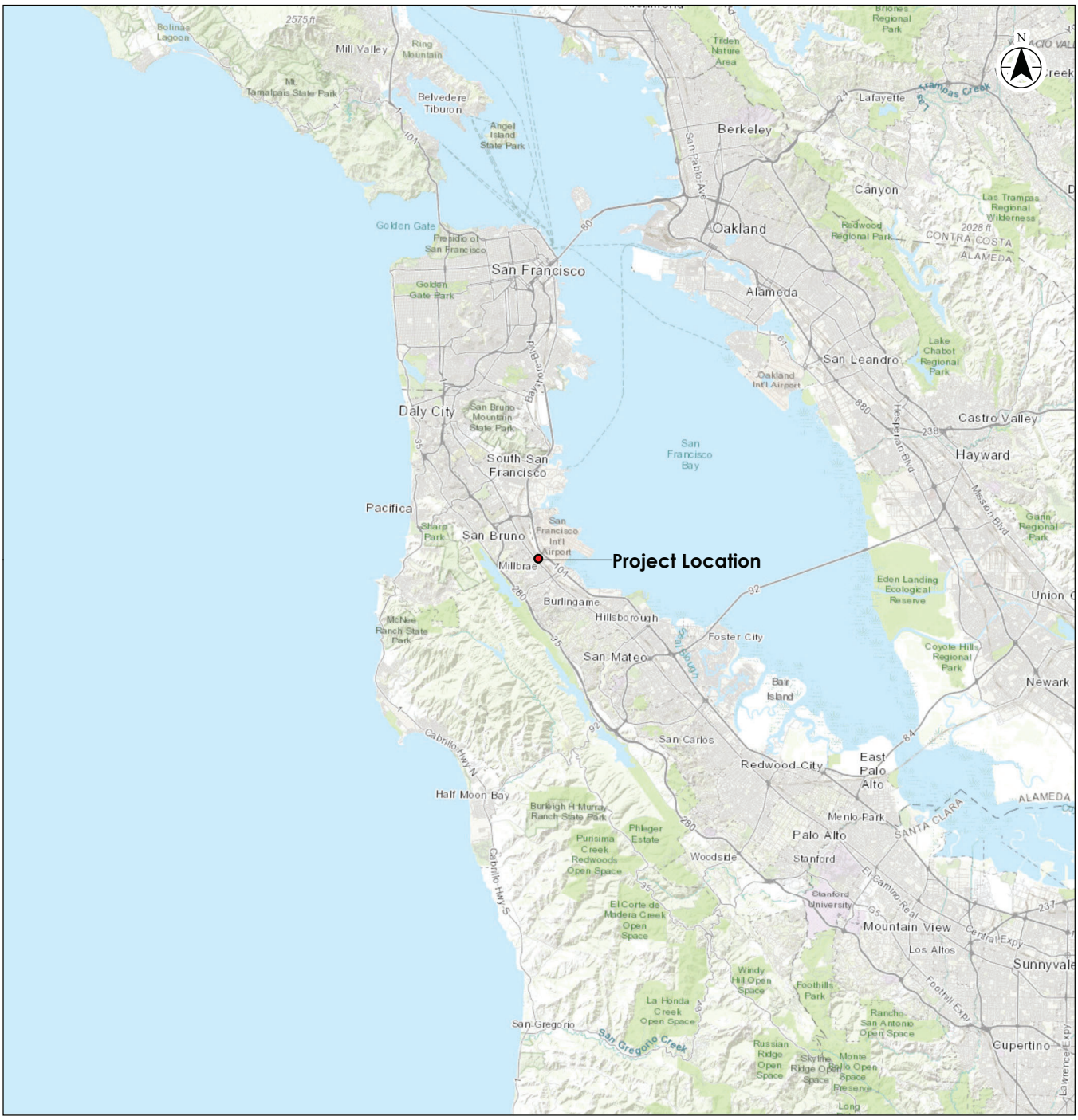
The purpose of an SCEA is to evaluate the environmental effects of the proposed project in accordance with the California Environmental Quality Act (CEQA). In addition, this SCEA evaluates the proposed project's consistency with the Metropolitan Transportation Commission (MTC)/ Association of Bay Area Governments' (ABAG's) Plan Bay Area 2050 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS) for the San Francisco Bay Area Region and incorporates all relevant and applicable feasible mitigation measures, performance standards, and/or criteria from prior applicable environmental impact reports (EIRs) into the proposed project.

An SCEA is a form of CEQA documentation established by Senate Bill (SB) 375 to provide streamlined environmental review for certain "transit priority projects." Transit priority projects are defined as residential or mixed-use residential projects that provide a minimum net density of 20 dwelling units per acre; are located within 0.5 mile of a major transit stop or high-quality transit corridor (PRC Section 21155[b]); and are consistent with the use designation, density, building intensity, and applicable policies of a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy.

An SCEA is comparable to an Initial Study/Mitigated Negative Declaration since the lead agency must find that all potentially significant impacts of a project have been identified, adequately analyzed, and mitigated to a level of insignificance. However, unlike a negative declaration, the SCEA need not consider the cumulative effects of the project that have been adequately addressed and mitigated in prior EIRs. Also, growth-inducing impacts are not required to be referenced, described, or addressed, and project-specific or cumulative impacts from cars and light-duty truck trips on global climate change or the regional transportation network need not be referenced, described, or discussed.

1.6 Project Location

The project site is located at 1100 El Camino Real near the southwest corner of El Camino Real and Center Street in Millbrae, California (Figure 2). The 6.7-acre project site consists of three parcels identified as Assessor's Parcel Numbers 021-324-190, 021-324-310, and 021-324-320, within the Millbrae Transit Station Area Priority Development Area (PDA). The Millbrae Transit Station Area PDA is a "Transit-Rich PDA" whereby at least 50 percent of the area within the PDA is within 0.5 mile of an existing rail station or ferry terminal (with bus or rail service), a bus stop with peak service frequency of 15 minutes or less, or a planned rail station or planned ferry terminal (with bus or rail service) in the most recently adopted fiscally-constrained Regional Transportation Plan (MTC 2021). The project site is north of the City's downtown district and is located 0.5 mile southwest of the San Francisco International Airport (SFO) BART station (Figure 3), a major transit stop that provides rail transit service throughout the Bay Area and is accessible from SamTrans bus routes 292, 397, 398, and El Camino Real (ECR) (Figure 3). The ECR bus route provides bus transit service along the El Camino Real corridor, which is adjacent to the southwestern boundary of the project site. The El Camino Real corridor runs through the extent of the Millbrae Transit Station Area PDA and is a high-quality transit corridor because the SamTrans ECR bus route arrives every 15 minutes during weekdays. The ECR bus route stops at the Millbrae BART/Caltrain station, the Palo Alto Transit Center, the Daly City BART station, and SFO. The bus stops closest to the project site are located at the intersection of El Camino Real and Center Street.



Notes
1. Coordinate System: NAD 1983 StatePlane California III FIPS 0403 Feet

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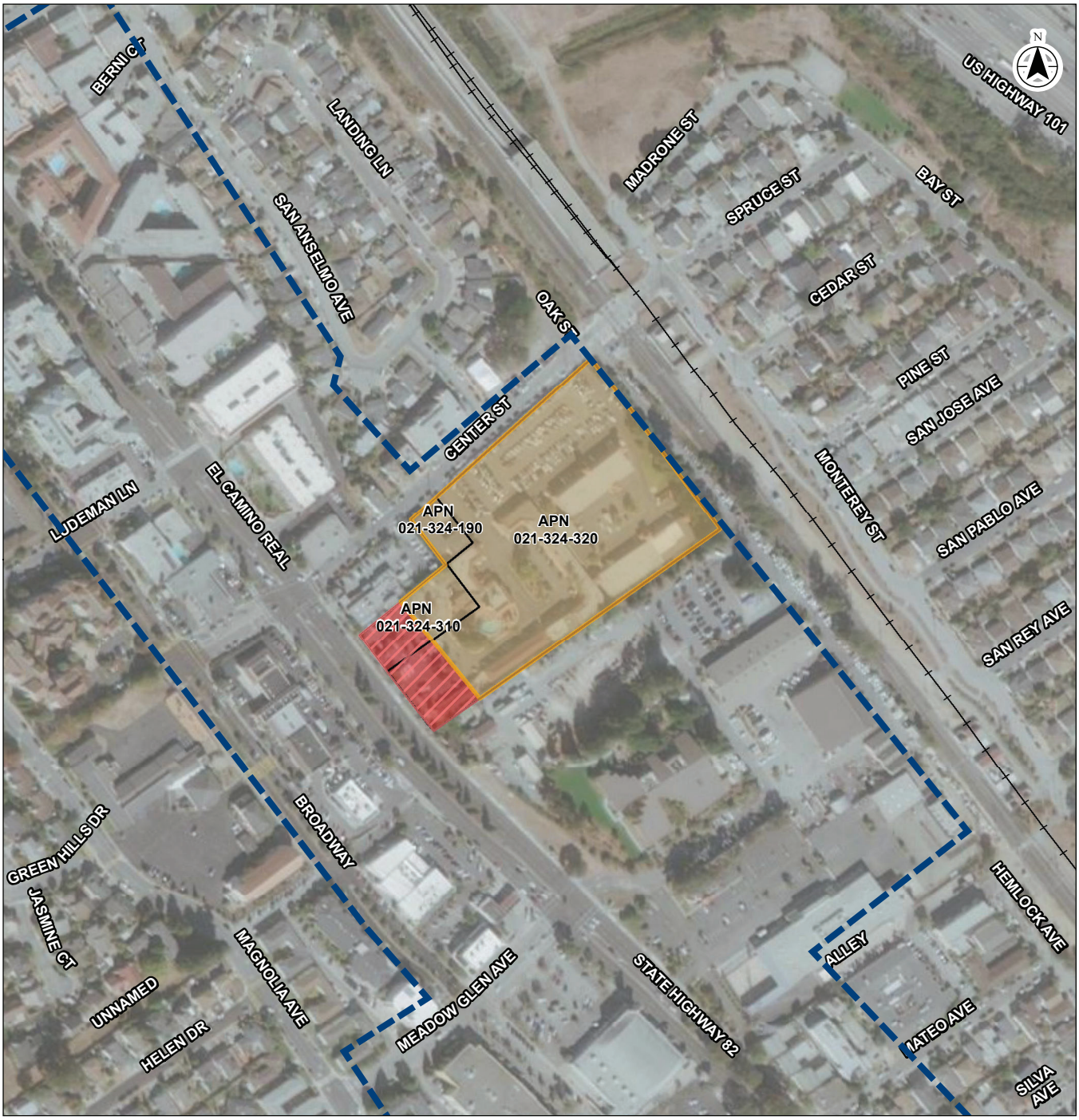
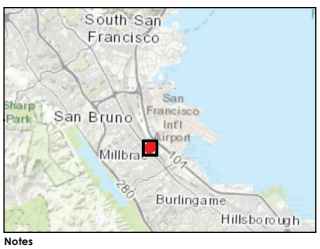
Figure 1
Project Location





Notes
1. Coordinate System: NAD 1983 StatePlane California III FIPS 0403 Feet
2. City of Millbrae Land Use Map, November 1998
3. City of Millbrae Zoning Map, October 2009

Legend

- Project Site Parcel Boundary
- Millbrae Transit Station Area Priority Development Area

City of Milbrae Existing General Plan

- General Commercial
- High Density Residential

City of Milbrae Existing Zoning

- Commercial (C)
- Multi-Family Residential (R-3)

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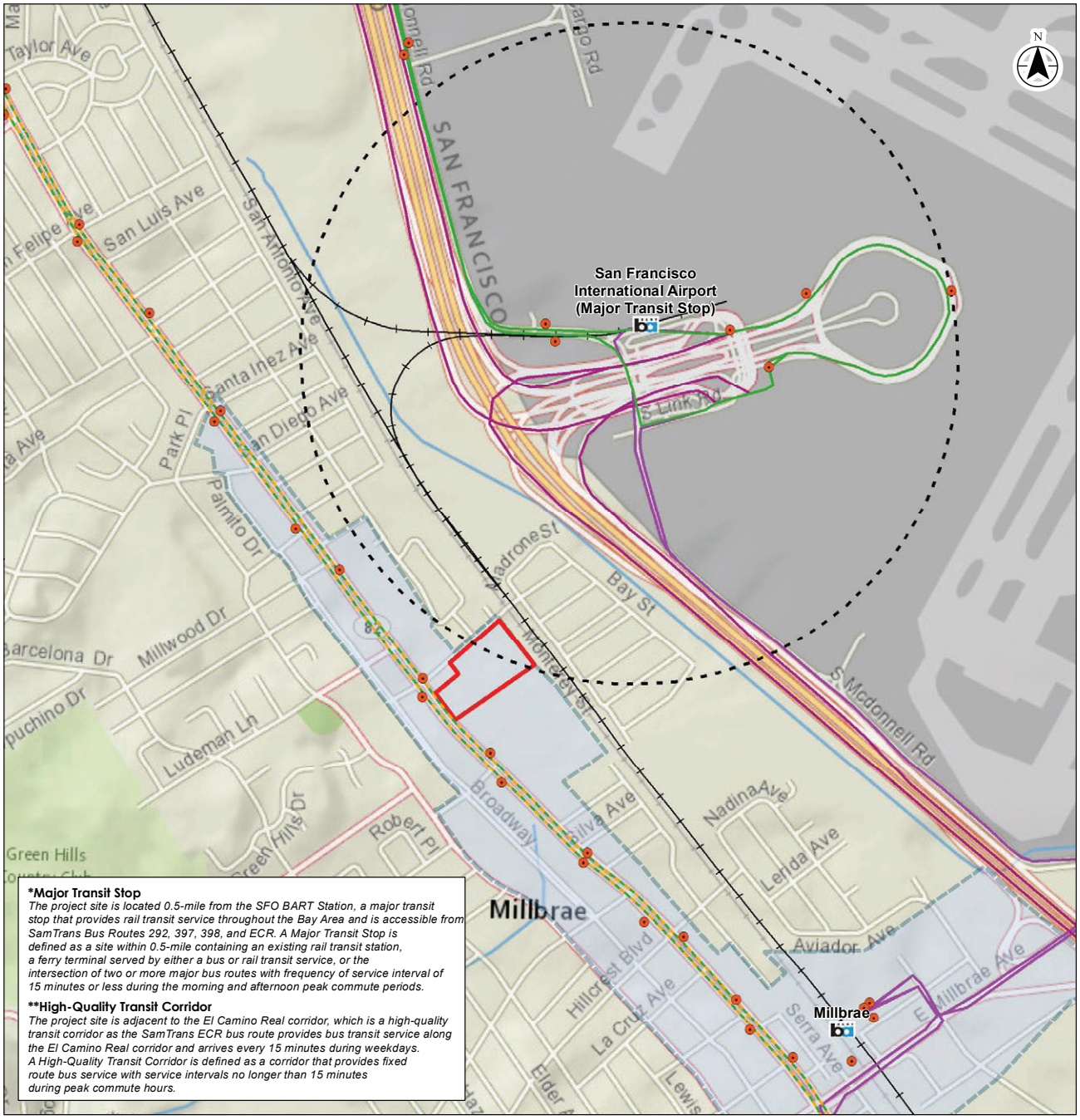
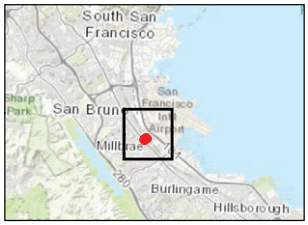
Figure 2
Project Site





Notes
1. Coordinate System: NAD 1983 StatePlane California III FIPS 0403 Feet

Legend

- Existing SamTrans Bus Stop
- BART Station
- Project Site
- 0.5-mile radius for Major Transit Stop*
- Millbrae Transit Station Area Priority Development Area***

SamTrans Bus Routes

- 292
- 397
- 398
- ECR (El Camino Real is a High-Quality Transit Corridor**)
- ECR Rapid

0 500 1,000 Feet

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***The Millbrae Transit Station Area Priority Development Area (PDA) is a "Transit-Rich PDA" whereby at least 50 percent of the area within the PDA is within 0.5-mile of an existing rail station or ferry terminal (with bus or rail service), a bus stop with peak service frequency of 15 minutes or less, or a planned rail station or planned ferry terminal (with bus or rail service) in the most recently adopted fiscally constrained Regional Transportation Plan*

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Figure 3
High Quality Transit Corridor and Major Transit Stop within 0.5-mile of Project Site

1.7 Existing Setting and Surrounding Land Uses

The project site is in an urbanized area and is developed with the El Rancho Inn and two residential buildings that are surrounded by surface parking. The El Rancho Inn consists of 8 two-story buildings that total approximately 47,329 gross square feet (gsf) with 220 guest rooms, onsite guest amenity areas, including an outdoor swimming pool, restaurant, and fitness center. The El Rancho Inn has approximately 108 employees and can accommodate up to 592 guests. Additionally, the restaurant can accommodate 246 people. The El Rancho Inn operates 24 hours a day Monday through Sunday.

The two existing residential buildings are located next to the El Rancho Inn at 33 and 35 Center Street. The building at 33 Center Street is a 3,363-square-foot apartment building with seven units and the building at 35 Center Street is a 757-square-foot single-family residence. Currently, there are 20 residents that live in the apartment complex and 3 residents that live in the single-family residence. The apartment complex and single-family residence are both market rate rental properties. All leases are on a month-to-month agreement and would be terminated 2 months prior to the start of construction.

Land uses surrounding the project site include multi-family and single-family residential developments to the northwest; the San Francisco Water Department and various commercial developments to the southeast; the Zen Peninsula Restaurant, hotels, and commercial auto-related businesses to the southwest; and the BART/Caltrain tracks to the northeast. The San Francisco International Airport is about 0.25 miles northeast of the project site.

1.8 Land Use Designation and Zoning

1.8.1 General Plan Land Use Designation

The project site is designated High Density Residential and General Commercial by the City's 1998 General Plan (Figure 2). A portion of the project site designated High Density Residential would be allocated to the future hotel use.

The General Plan defines the High Density Residential land use designation as follows:

> The purpose of the High-Density Residential designation is to, "allow for residential development at a density of up to 80 units per acre. This density is usually associated with multi-family structures (apartments and condominiums) of 40 units per acre, but the highest density is associated with buildings up to six stories. Other uses include rooming and boarding houses, sanitariums, and rest homes. Professional offices could be allowed as a conditional use. Uses related to residential uses such as schools, churches, child care centers, and tot lots may be permitted (City of Millbrae 1998a).

The proposed five-story apartment complex would provide 384 apartment units at a density of 69 dwelling units per acre and would be consistent with the type of uses allowed in the High Density Residential land use designation.

The General Plan defines the General Commercial land use designation as follows:

> The purpose of the General Commercial land use designation is to provide areas for retail commercial uses, including apparel and accessory stores, food stores, banks, personal and professional services, hospitals, offices, furniture stores, restaurants, wholesale-retail trade, and

auto-related uses. Apartments and outdoor sales are allowed as conditional uses (City of Millbrae 1998a).

The future hotel would be consistent with the type of uses allowed in the General Commercial land use designation.

1.8.2 Zoning

The project site is zoned Multi-Family Residential District (R-3) and Commercial (C) (Figure 2). A portion of the project site zoned Multi-Family Residential would be allocated to the future hotel use.

The purpose of the Multi-Family Residential district is to enable and enhance the residential character of those areas of the City designated for apartment living by requiring adequate amounts of cooperatively used service facilities and outdoor open space at the highest residential densities available in Millbrae. This district correlates with the "higher density" land use designation of the Millbrae General Plan (City of Millbrae 2019). Multi-family dwelling units are permitted in this zoning district, and commercial lodging uses are allowed with a conditional use permit. The maximum height of structures in Multi-Family Residential district is 40 feet (City of Millbrae 2019).

For the proposed apartment complex, the applicant is requesting approval of a Residential Design Review permit, in addition to a Lot Line Adjustment and Lot Merger.

The purpose of the General Commercial zoning district is to provide commercial uses that do not necessarily specialize in serving the pedestrian shopper, but rather, because of the character of their products or services, are more appropriately although not exclusively located along major thoroughfares away from more centralized shopping areas. This district correlates with the "general commercial" land use designation of the Millbrae General Plan (City of Millbrae 2019). Multi-family dwellings and commercial lodging uses are allowed in this zoning district with a conditional use permit. The maximum height of structures in the General Commercial zoning district is 40 feet (City of Millbrae 2019). The applicant has not submitted a development application to the City for the hotel; therefore, this document does not discuss the entitlements associated with the hotel.

1.8.3 State Density Bonus Law

The proposed project would comply with the State Density Bonus law and provide 5 percent of the total residential units (19 units) at the very-low-income level. Pursuant to Section 65915(b)(1) of the California Government Code, cities are required to grant a density bonus, modifications/waivers to development standards, and one concession/incentive to housing projects that provide affordable housing at certain levels. The applicant is not requesting a concession/incentive at this time but reserves the right to request one, if necessary. The applicant is entitled to the following two requested modifications/waivers for the proposed project based on the inclusion of 5 percent very-low-income units:

- Waiver of the maximum 40-foot height limit in order to achieve the proposed density. The applicant is requesting an approximate height of 65 feet in 5 stories.
- Waiver of the 1,000 square feet/unit minimum lot size per unit. In order to achieve the density, the applicant has requested an approximate average minimum lot size of 633 square feet per unit.

Under State Density Bonus law, the applicable residential density maximum is 80 dwelling units per acre, as provided in the 1998 General Plan High Density Residential designation. This would amount to 536 units for the 6.7-acre project site. Pursuant to the State Density Bonus Law, a project's concessions/incentives and modifications/waivers do not make it inconsistent with the City's development standards. Rather, a finding of consistency is made after taking these into account.

1.9 Statutory Background

The Sustainable Communities and Climate Protection Act of 2008 amended CEQA to add Chapter 4.2, Implementation of the Sustainable Communities Strategy (PRC Section 21155), which provides a CEQA exemption for sustainable community projects and streamlined CEQA analysis for transit priority projects.

One such streamlining provision is the SCEA, the provisions of which are specified primarily in PRC Section 21155.2. Section 21155.2(a) states that if a transit priority project incorporates all relevant and applicable feasible mitigation measures, performance standards, or criteria set forth in the prior applicable EIRs and adopted findings made pursuant to PRC Section 21081, then it shall be eligible for an SCEA. The specific substantive and procedural requirements for the approval of an SCEA include the following:

1. An initial study shall be prepared for a SCEA to identify all significant impacts or potentially significant impacts of the transit priority project, except for the following:
    a. Growth-inducing impacts, and
    b. Project-specific or cumulative impacts from cars and light trucks on global climate change or the regional transportation network.
2. The initial study shall identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be cumulatively considerable.
3. The SCEA shall contain mitigation measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.
4. The SCEA may be approved by the lead agency after the lead agency's legislative body conducts a public hearing, reviews comments received, and finds the following:
    a. All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed, and
    b. With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:
        1) Changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.
        2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
5. The lead agency's decision to review and approve a transit priority project with an SCEA shall be reviewed under the substantial evidence standard.

For a detailed analysis of the proposed project's compliance with the SCEA statutory requirements, see Section 3.0, SCEA Criteria and Transit Priority Project Consistency.

1.10 CEQA And Public Agency Review

CEQA requires that project proponents disclose the significant impacts to the environment from proposed development projects. The intent of CEQA is to foster good planning and to consider environmental issues during the planning process. The City is the lead agency under CEQA for the preparation of this SCEA. The CEQA Guidelines (Section 21067) define the lead agency as, "the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment." Approval of the proposed project is considered a public agency discretionary action; therefore, the proposed project is subject to compliance with CEQA. The City has directed the preparation of an SCEA to comply with CEQA.

The purpose of this document is to disclose the environmental consequences of implementing the proposed project to decision-makers and the public. The public, City residents, and other local and state resource agencies will be given the opportunity to review and comment on this document during a 30-day public-review period. Comments received during the review period will be considered by the City prior to certification of this SCEA and project approval.

The public review period will commence on **January 14, 2022** and end on **February 14, 2022**, pursuant to PRC 21155.2(b)(3). If you wish to send written comments (including via email), they must be received by 5:00 p.m. on **February 14, 2022**. Written comments should be addressed to:

Sam Fielding, Senior Planner
Phone: (650) 259-2336
Email: SFielding@ci.millbrae.ca.us

This SCEA and supporting documents are available at the City of Millbrae Planning Division, located at 621 Magnolia Avenue Millbrae, California 94030, and online at the following URL: **https://www.ci.millbrae.ca.us/Home/Components/FacilityDirectory/FacilityDirectory/1127/744**

1.11 Document Organization

This SCEA is organized as follows:

- **Section 1.0 Introduction.** This section provides introductory information about the proposed project and background information regarding SB 375 and the SCEA process and streamlining provisions.
- **Section 2.0: Project Description.** This section describes the purpose of and need for the proposed project, identifies project objectives, and provides a detailed description of the proposed project.
- **Section 3.0: SCEA Criteria and Transit Priority Project Consistency.** This section includes a discussion of the proposed project's consistency with the transit priority project criteria listed above and demonstrates that the proposed project satisfies all necessary criteria for approval of an SCEA as set forth in PRC Sections 21155 and 21155.2.

- **Section 4.0: Environmental Checklist and Environmental Evaluation.** This section presents an analysis of a range of environmental issues identified in the CEQA Appendix G Environmental Checklist and determines if the proposed project would result in no impact, a less-than-significant impact, a less-than-significant impact with mitigation incorporated, or a potentially significant impact for each topic. If impacts are determined to be potentially significant after incorporation of applicable mitigation measures, an EIR would be required. For this proposed project, however, mitigation measures have been incorporated, where needed, that would reduce all potentially significant impacts to a less-than-significant level.
- **Section 5.0: References.** This section lists the references used in preparation of this SCEA.
- **Section 6.0: List of Preparers.** This section identifies report preparers.

1.12 Summary of Mitigation Measures

Table 1.12-1 summarizes the potential environmental effects of the proposed project, the recommended mitigation measures, if applicable, and the level of significance after mitigation. As shown in Table 1.12-1, development of the proposed project with mitigation measures would not result in any significant and unavoidable impacts. CEQA requires public agencies to establish a Mitigation Monitoring and Reporting Program (MMRP) for the purpose of ensuring compliance with those mitigation measures adopted as conditions of approval to mitigate or avoid significant environmental impacts identified in a CEQA document. An MMRP, incorporating the mitigation measures set forth in this document, would be adopted at the time of adoption of the SCEA.

Table 1.12-1. Summary of Impacts and Mitigation Measures

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
Section 4.2: Air Quality			
AIR-1: Conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant Impact	Mitigation Measure AIR-1 (PBA EIR MM AQ-2: Construction Best Practices)	Less Than Significant Impact With Mitigation
AIR-2: 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?	Potentially Significant Impact	Mitigation Measure AIR-1 (PBA EIR MM AQ-2: Construction Best Practices)	Less Than Significant Impact With Mitigation
AIR-3: Expose sensitive receptors to substantial pollutant concentrations?	Potentially Significant Impact	Mitigation Measure AIR-1 (PBA EIR MM AQ-2: Construction Best Practices)	Less Than Significant Impact With Mitigation
Section 4.3: Biological Resources			
BIO-1: 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 Game or U.S. Fish and Wildlife Service?	Potentially Significant Impact	Mitigation Measure BIO-1 (Avoid Disturbance of Nesting Birds) Mitigation Measure BIO-2 (Avoid Disturbance of Roosting Bats)	Less Than Significant Impact With Mitigation
Section 4.4: Cultural Resources			
CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Potentially Significant Impact	Mitigation Measure CUL-1 (PBA EIR MM CUL/TCR-2: Archeological Resources)	Less Than Significant Impact With Mitigation

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
Section 4.6: Geology and Soils			
GEO-1: 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? Refer to Division of Mines and Geology Special Publication 42. Strong seismic ground shaking? Seismic-related ground failure, including liquefaction? Landslides?	Potentially Significant Impact	Mitigation Measure GEO-1 (Implement Geotechnical Design Recommendations)	Less Than Significant Impact With Mitigation
GEO-2: Result in substantial soil erosion or the loss of topsoil?	Potentially Significant Impact	Mitigation Measure HYD-1 (Prepare and Implement a Stormwater Pollution Prevention Plan [SWPPP])	Less Than Significant Impact With Mitigation
GEO-3: Be located on strata 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?	Potentially Significant Impact	Mitigation Measure GEO-1 (Implement Geotechnical Design Recommendations) Mitigation Measure GEO-2 (Prepare and Implement Dewatering and Shoring Plans)	Less Than Significant Impact With Mitigation
GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?	Potentially Significant Impact	Mitigation Measures GEO-1 (Implement Geotechnical Design Recommendations)	Less Than Significant Impact With Mitigation
GEO-6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant Impact	Mitigation Measure GEO-3 (PBA EIR MM GEO73: Paleontological Resources)	Less Than Significant Impact With Mitigation

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
Section 4.8: Hazards and Hazardous Materials			
HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Potentially Significant Impact	Mitigation Measure HAZ-1 (Removal of Asbestos and Lead Based Paint)	Less Than Significant Impact With Mitigation
HAZ-2: 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?	Potentially Significant Impact	Mitigation Measure HAZ-1 (Removal of Asbestos and Lead Based Paint)	Less Than Significant Impact With Mitigation
HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Potentially Significant Impact	Mitigation Measure HAZ-1 (Removal of Asbestos and Lead Based Paint) Mitigation Measure AIR-1 (PBA EIR MM AQ-2: Construction Best Practices)	Less Than Significant Impact With Mitigation
Section 4.9: Hydrology and Water Quality			
HYD-1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Potentially Significant Impact	Mitigation Measure HYD-1 (Prepare and Implement a SWPPP)	Less Than Significant Impact With Mitigation
HYD-2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Potentially Significant Impact	Mitigation Measure GEO-2 (Prepare and Implement Dewatering and Shoring Plans)	Less Than Significant Impact With Mitigation

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
HYD-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would: 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; 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 Impede or redirect flood flows?	Potentially Significant Impact	Mitigation Measure HYD-1 (Prepare and Implement a SWPPP)	Less Than Significant Impact With Mitigation
HYD-4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Potentially Significant Impact	Mitigation Measure HYD-1 (Prepare and Implement a SWPPP)	Less Than Significant Impact With Mitigation
HYD-5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Potentially Significant Impact	Mitigation Measure HYD-1 (Prepare and Implement a SWPPP) Mitigation Measure GEO-2 (Prepare and Implement Dewatering and Shoring Plans)	Less Than Significant Impact With Mitigation
Section 4.12: Noise			
NOI-1: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Potentially Significant Impact	Mitigation Measure NOI-1 (PBA EIR MM NOISE-1: Construction Noise Levels) Mitigation Measure NOI-2 (PBA EIR MM NOISE-2(a): Increased Noise from Traffic and Transit) Mitigation Measure NOI-3 (PBA EIR MM NOISE-2(b): Ambient Noise) Mitigation Measure NOI-4 (Railroad Noise Reduction)	Less Than Significant Impact With Mitigation

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
NOI-3: For a project located within the vicinity of a private airstrip or airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport of public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Potentially Significant Impact	Mitigation Measure NOI-3 (PBA EIR MM NOISE-2(b): Ambient Noise) Mitigation Measure NOI-4 (Railroad Noise Reduction)	Less Than Significant Impact With Mitigation
Section 4.15: Recreation			
REC-1: 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?	Potentially Significant Impact	REC-1: Payment of Fees for Park Maintenance	Less Than Significant Impact With Mitigation
REC-2: Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	Potentially Significant Impact	REC-1: Payment of Fees for Park Maintenance	Less Than Significant Impact With Mitigation
Section 4.16: Transportation			
TRANS-1: Conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Potentially Significant Impact	Mitigation Measure TRANS-1 (Construction Traffic)	Less Than Significant Impact With Mitigation
TRANS-3: Substantially increase hazards to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Potentially Significant Impact	Mitigation Measure TRANS-2 (Driveway Distance)	Less Than Significant Impact With Mitigation

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance after Mitigation
Section 4.17: Tribal Cultural Resources			
TRIB-1: 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 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 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.	Potentially Significant Impact	Mitigation Measure CUL-1 (PBA EIR MM CUL/TCR: Archeological Resources [which is the same as CUL/TCR-4(b)]) Mitigation Measure TRIB-1 (PBA EIR MM CUL/TCR-4(a): Tribal Cultural Resources)	Less Than Significant Impact With Mitigation
Section 4.18: Utilities and Service Systems			
UTIL-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Potentially Significant Impact	Mitigation Measure UTIL-1 (PBA EIR MM PUF-1: Water and Wastewater Treatment Facilities) Mitigation Measure UTIL-2 (PBA EIR MM PUF-2(a): Water Supply) Mitigation Measure UTIL-3 (PBA EIR MM PUF-3: Wastewater Treatment Capacity)	Less Than Significant Impact With Mitigation
UTIL-3: Result in a determination by the wastewater treatment provider, which serves or may serve the proposed project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Potentially Significant Impact	Mitigation Measure UTIL-1 (PBA EIR MM PUF-1: Water and Wastewater Treatment Facilities) Mitigation Measure UTIL-3 (PBA EIR MM PUF-3: Wastewater Treatment Capacity)	Less Than Significant Impact With Mitigation

Chapter 2
Project Description

2.1 Project Overview

The proposed project involves the redevelopment of a 6.7-acre site located near the intersection of El Camino Real and Center Street in the City of Millbrae (Figure 2). The project site is currently developed with the El Rancho Inn and two residential buildings that are surrounded by surface parking. The applicant is proposing to demolish all existing structures and construct a new five-story apartment complex and parking garage on 5.5 acres of the site. The applicant may also include the future development of a seven-story hotel on the remaining 1.2 acres of the project site, which would occur under a separate development application. The proposed apartment complex would be approximately 397,272 gsf and would consist of 384 apartment units, common open space and recreational amenity areas for project residents and guests, and office space for property management and leasing services. The proposed apartment complex would wrap around a six-level above-ground parking garage of approximately 203,514 gsf. The future hotel is anticipated to be approximately 135,967 square feet and surround an approximately 69,533 square foot above-ground parking garage. The future hotel would include up to 200 guest rooms and onsite amenity areas such as a restaurant and meeting room that could be reserved by businesses, local community organizations, and residents for family or special events. Other site improvements part of the proposed project would include landscaping, utility connections, and construction of pedestrian walkways and internal access driveways. The project site plan is shown in Figure 4.

2.2 Project Components

2.2.1 Proposed Apartment Complex

The proposed project would develop a five-story apartment complex on 5.5 acres of the site. The proposed apartment complex would be approximately 397,272 gsf and would include 384 apartment units at a density of 69 dwelling units per acre, common open space and recreational amenity areas for project residents and guests, and office space for property management and leasing services. The proposed apartment complex would have a maximum height of 65 feet and would wrap around a six-level above-ground parking garage. Table 2.2-1 provides a summary of the residential components. Renderings of the proposed project are provided in Figures 5 through 7.

The apartment units would be located on each floor of the building and would consist of 49 studio apartments, 198 one-bedroom apartments, and 137 two-bedroom apartments – totaling 384 apartment units. Of these 384 apartment units, the proposed apartment complex would include 19 affordable units at the very low-income level.

Table 2.2-1. Residential Summary

Use	Gross Square Feet
Residential	**397,272**
Residential Floor (384 units)	389,359
Residential Amenity	6,858
Residential Leasing Lobby	1,055
Private Open Space[1]	**17,280**
Onsite Recreational Amenities[2]	**6,858**
Onsite Common Open Space [3]	**90,670**
Courtyard A[4]	25,375
Courtyard B[5]	10,245
Courtyard C[6]	7,114
Amenity Roof Deck	1,500
Emergency Vehicle Access Yard and Pedestrian Path[7]	33,495
Center Street Frontage[8]	7,941
Entry Court[9]	5,000
Parking Garage (548 spaces)	**203,514**

Notes:

[1] Private Open Space consists of +/- 45-square-foot balconies provided to each residential unit (total 17,280 square feet).

[2.] Onsite Recreational Amenities including a fitness center, bike locker and repair area, pet spa for grooming, community lounges with indoor/outdoor kitchens and dining, and business pods for telecommuters, all totaling approximately 6,858 square feet of interior amenity area. Onsite Recreational Amenities would be available to project residents and guests.

[3]Onsite Common Open Space consists of Courtyards A, B, and C; the amenity roof deck; emergency vehicle access yard and pedestrian path, Center Street frontage, and entry court (total 90,670 square feet). Onsite Common Open Space would be available to project residents and guests.

[4] Courtyard A includes a resort style pool and spa, cabanas, festival lighting, outdoor dining, televisions, barbeque, and fire pits.

[5] Courtyard B includes an outdoor fitness lawn extending from the indoor fitness center, fountains, and conversational seating.

[6] Courtyard C includes another outdoor kitchen, dining, a firepit, and a bocce ball court.

[7] EVA Yard and Pedestrian Path are designed for dual use to provide emergency vehicle access but they also include painted games, activities, and a walking path.

[8] Center Street Frontage provides an 8-foot public walkway, vibrant landscaping, courtyards, and public seating nodes with decorative furniture and paving.

[9] Entry Court includes publicly accessible water fountain courtyard, olive tree grove, and seating.

Source: KTGY Architecture and Planning, June 2020

Graphics ... 00406.20 (11/17/21) AB

Figure 4
Project Site Plan

Before - Perspective from the intersection of Cetner Street and San Anselmo

After - Perspective from the intersection of Cetner Street and San Anselmo

Source: KTGY Architecture and Planning, June 2020

Graphics 00406.20 (11/18/21) AB

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Figure 5
Project Rendering from Intersection of Center Street and San Anselmo

Before - Perspective from the Railroad Tracks on Center Street

After - Perspective from the Railroad Tracks on Center Street

Source: KTGY Architecture and Planning, June 2020

Graphics 00406.20 (11/18/21) AB

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Figure 6
Project Rendering from the BART/ Caltrain Tracks on Center Street

Before - Perspective from the intersection of Center Street and El Camino Real

After - Perspective from the intersection of Center Street and El Camino Real with Proposed Apartment Complex and Hotel[1]

[1] The design of the future hotel is conceptual; therefore, this figure includes a preliminary block diagram of the future hotel to represent the anticipated maximum height and footprint of the building.

Source: KTGY Architecture and Planning, June 2020

Graphics 00406.20 (11/18/21) AB

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Figure 7
Project Rendering from Intersection of Center Street and El Camino Real

2.2.1.1 Future Resident and Employment Estimates

Based on the U.S. Census Bureau 2018 household data of 2.73 persons per household[1] in the City, it is estimated that operation of the proposed project would generate approximately 1,048 new residents (USCB 2018). Therefore, it is anticipated that the proposed apartment complex would generate 1,048 new residents, or 1,025 net new residents. The proposed apartment complex would also include 1,055 square feet of office space for leasing and property management services and would require up to four full-time employees.

2.2.1.2 Onsite Common Open Space and Recreational Amenities

As shown in Figures 8 through 11, the proposed apartment complex would include an array of onsite common open space and recreational amenities for use by project residents and guests. The onsite recreational amenities would consist of approximately 6,858 square feet of interior space on the first and second floors and include community lounges with indoor/outdoor kitchens and dining area, a fitness center, a bike locker and repair area, a pet spa for grooming (wash station), and business pods for telecommuters. Additionally, the proposed project would provide approximately 90,670 square feet of common open space for project residents and guests. The common open space areas would consist of three outdoor courtyard areas that include a swimming pool and spa, outdoor barbeque and dining areas, game and seating areas, outdoor fitness lawn, fountains, and fire pits. A rooftop terrace that overlooks the pool deck would also be provided above the resident lounge. A dual use emergency vehicle access (EVA) yard and pedestrian path would also be constructed around the site perimeter to provide additional open space, and secondary access to the outdoor courtyards, Center Street frontage, and El Camino Real frontage. The Center Street frontage would provide an 8-foot public walkway, courtyards, and public seating nodes with decorative furniture and paving. The EVA yard would utilize an AirPave grass paving system, which has the appearance and drainage abilities of turf, but the rigidity needed for emergency vehicles to drive on. The EVA yard would also connect to the project's entry court. The entry court would provide a publicly accessible water fountain courtyard, olive tree grove, and communal seating for residents.

Primary access to the apartment units, outdoor courtyards, and onsite amenities would be from the ground floor residential lobby areas on Center Street, or from the resident parking garage. Access to the outdoor courtyards would be interconnected by interior corridors.

2.2.1.3 Aesthetics and Design

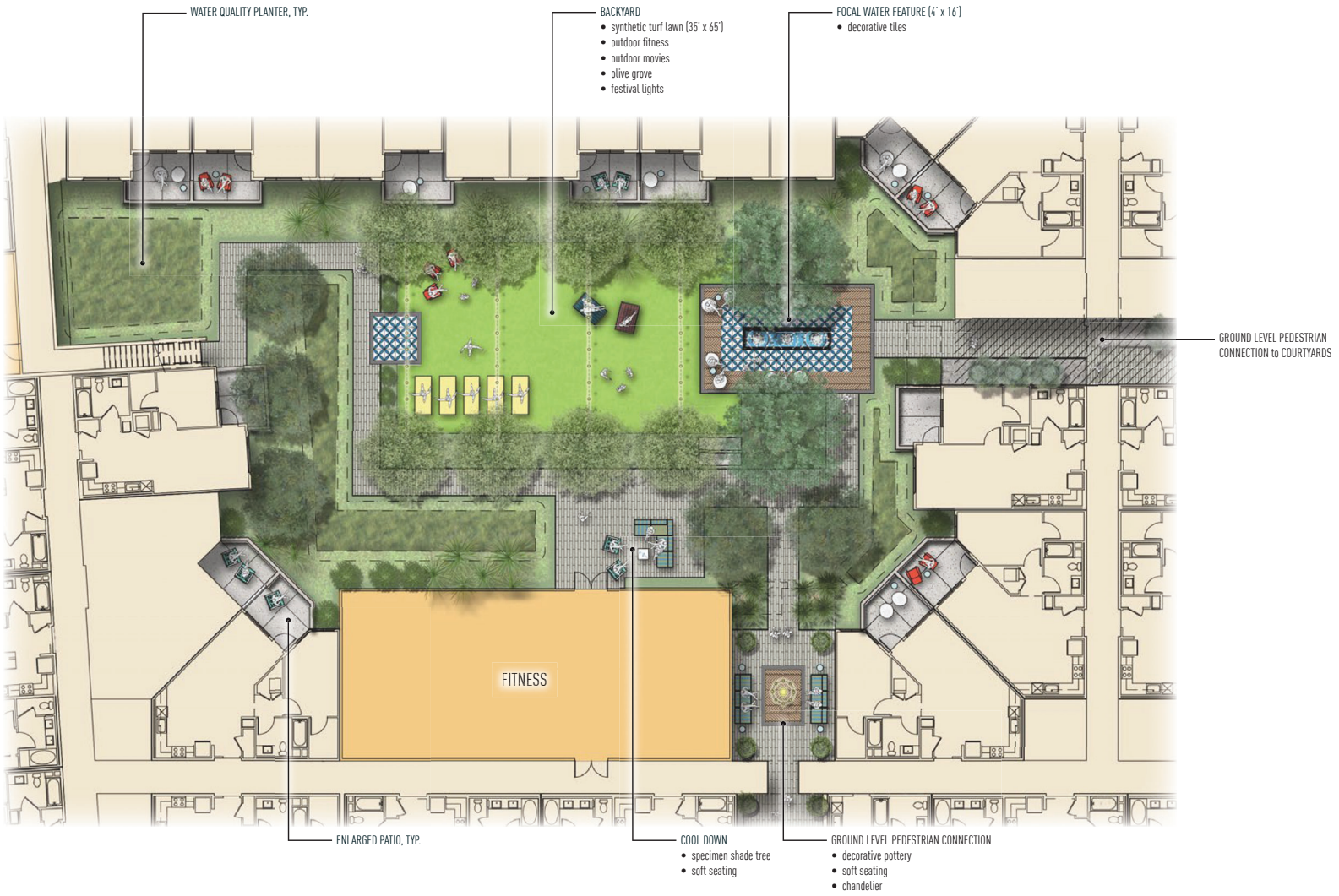
The proposed building would incorporate mission style architecture that reflects the existing character of the El Rancho Inn, while also adding contemporary elements that complement the more recent developments along the El Camino Real corridor. Development of the proposed apartment complex would also require construction of a concrete retaining wall along a portion of Center Street due to the slope of the site relative to the street. The proposed retaining wall would range from 5 to 10 feet tall and would be setback approximately 25 to 30 feet from Center Street. The retaining wall would be designed in accordance with Section 9.45.310 of the Millbrae Municipal Code.

[1] The U.S Census Bureau's 2018 household data of 2.73 persons per household is the average for all households in the City, including single-family and multi-family dwelling units (UCSB 2018).

Source: KTGY Architecture and Planning, June 2020

Graphics ... 00406.20 (11/17/21) AB

Figure 8
Courtyard A



0 8 16 32

Source: KTGY Architecture and Planning, June 2020

Graphics ... 00406.20 (11/17/21) AB

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Figure 9
Courtyard B

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Source: KTGY Architecture and Planning, June 2020

Graphics ... 00406.20 (11/17/21) AB

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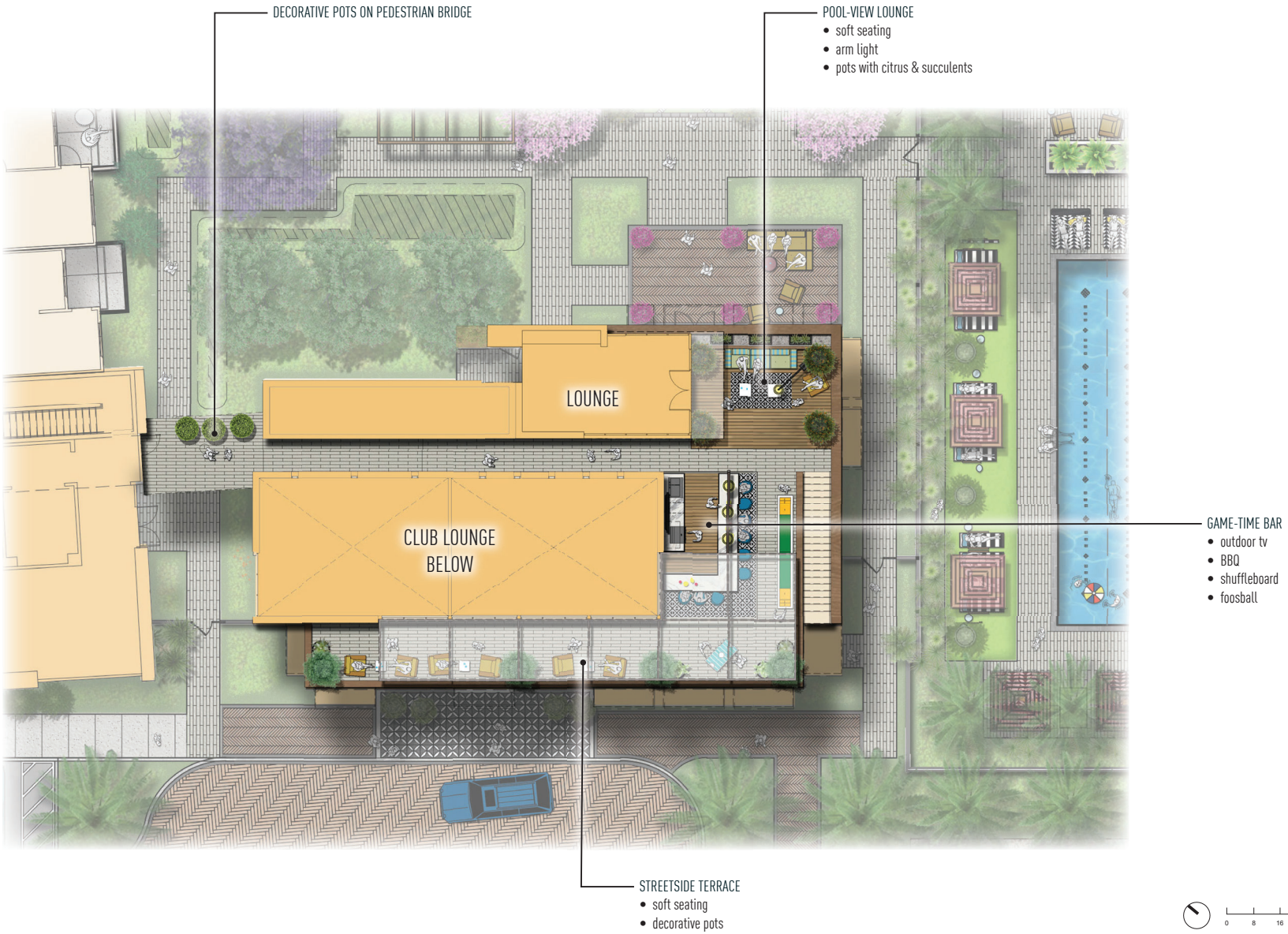
Figure 10
Courtyard C



Source: KTGY Architecture and Planning, June 2020

Graphics ... 00406.20 (11/29/21) AB

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Figure 11
Roof Terrace

2.2.2 Future Hotel

The applicant may also develop a seven-story hotel building on the remaining 1.2 acres of the project site in the future, which would occur under a separate development application. For purposes of this SCEA analysis the potential impacts of the seven-story hotel on the remaining 1.2 acres of the project site have been evaluated and are included in the overall impact assessment and conclusions of this document. The following provides a description of the future hotel analyzed in this document; however, the future hotel has not been fully designed and the following description should be considered conceptual and subject to change. Figure 7 includes a preliminary block rendering of the future hotel to represent the anticipated scale and maximum height of the building.

Future Hotel Building, Parking Garage, and Amenities

The future hotel is anticipated to be approximately 135,967 gsf and up to 85 feet in height. The future hotel is anticipated to include up to 200 guest rooms and onsite amenity areas such as a 2,500 square foot restaurant, and a 3,000 square foot meeting room that could be reserved by businesses, local community organizations, and residents for family or special events. Future hotel guest parking is also anticipated to be separate from the proposed residential component and consist of an above-ground parking garage of approximately 69,533 square feet with up to 187 parking spaces. The future hotel building and the above-ground parking garage are anticipated to total approximately 205,500 gsf.

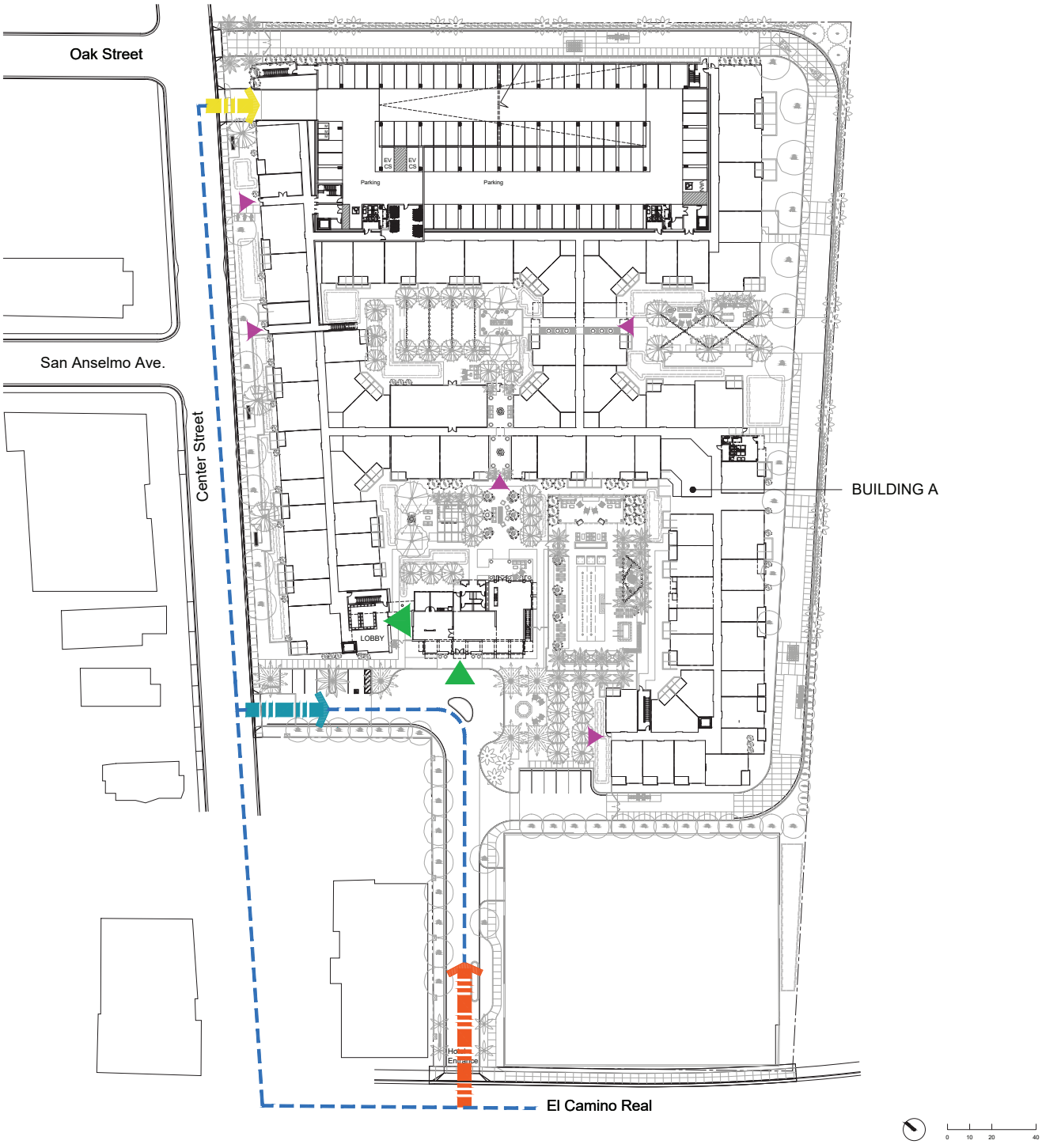
Future Hotel Employment Estimate

Future operation of the hotel would require up to 90 full-time employees. Based on an average of two guests per hotel room, the proposed project would generate up to 400 guests at maximum capacity. It is expected that the proposed project would operate 24 hours a day Monday through Sunday.

2.2.3 Access, Circulation, and Parking

2.2.3.1 Site Access and Circulation

Access to the proposed apartment complex would be provided by one driveway on El Camino Real and from two driveways on Center Street (Figure 12). The driveway on El Camino Real would provide access to the future hotel and through access to the apartment complex. The two driveways on Center Street would provide direct access to the residential leasing office and parking garage, and would provide a secondary access for the future hotel. The driveway on El Camino Real and the first driveway on Center Street would connect internally and provide access to additional surface parking. The driveway widths would range from 22 to 26 feet wide and would allow vehicles to enter and exit the project site from either direction. Curb extensions or bulbouts would be installed at the intersection of San Anselmo Avenue and Center Street, and a midblock crossing with stop signs and high visibility crosswalk striping would be installed along Center Street.



Source: KTGY Architecture and Planning, June 2020

Graphics 00406.20 (11/29/21) AB

Figure 12
Vehicle Access

There are existing sidewalks along Center Street and El Camino Real that connect the project site to the surrounding land uses. The proposed project would improve the Center Street frontage by replacing the existing Center Street sidewalk on the south side with new sidewalk, curb and gutter, and pavement restoration, widening the sidewalk to 6 feet, planting shade and accent trees, and include public seating areas. The proposed project would also widen the sidewalk along the El Camino Real frontage to 10 feet and install Americans with Disabilities Act (ADA) ramps per Caltrans Standards along Center Street. Additionally, the proposed project would install a new sidewalk at the Zen Peninsula Restaurant frontage along Center Street to create pedestrian connectivity over the top of and close to existing cable, fiber, phone, electric, water, storm, gas, and other utilities. None of the existing utilities, including the overhead utility lines, would need to be relocated.

The proposed project would also construct an EVA yard and pedestrian path along the site perimeter which would also provide access to the outdoor courtyard areas, Center Street, and El Camino Real. The EVA yard and pedestrian path would be at least 20 feet wide and would be constructed of vehicular rated pavers and artificial grass paving to allow emergency vehicle access.

2.2.3.2 Vehicle Parking

Residential Component

The proposed apartment complex would wrap around an above-ground parking garage of approximately 203,514 gsf. The proposed resident parking garage would have six levels and would be approximately 50 feet in height. Pursuant Section 10.05.2100 of the Millbrae Municipal Code, the proposed apartment complex would be required to provide at least 521 parking spaces.[2] The proposed apartment complex would exceed the requirements of the Millbrae Municipal Code and provide 548 parking spaces for residents consisting of 530 standard spaces, 2 motorcycle spaces, 8 accessible spaces, 6 accessible van spaces, and 17 spaces equipped with charging stations for electric vehicles. The proposed project would provide an additional 12 surface parking spaces near the leasing lobby for guests. As such, there would be a total of 560 parking spaces.

Hotel Component

Future hotel guest parking would be separate from the proposed apartment complex. Like the apartment complex, the future hotel would likely wrap around an above-ground parking garage of approximately 69,533 gsf with up to 187 parking spaces.

2.2.3.3 Bicycle Parking

Residential Component

Pursuant to Section 10.05.2120 of the Millbrae Municipal Code, the proposed project would be required to provide at least 54 bicycle parking spaces (10 percent of vehicle parking provided). The proposed apartment complex would exceed the requirements of the Millbrae Municipal Code and include 60 long-term and 12 short-term bicycle parking spaces for residents and visitors for a total of 72 bicycle parking spaces. Long-term bicycle parking spaces would be provided in two dedicated

[2] Pursuant to the State Density Bonus Law, the proposed project is further entitled to a mandatory reduction in the applicable requirement. The City may not require more than the amount specified in Government Code Section 65615(p).

storage rooms located on the ground floor and first level of the parking garage, and bicycle racks would be provided along Center Street for short-term parking. The ground floor of the apartment complex would also include a bike station for maintenance and repairs.

Hotel Component

The future hotel component would also be subject to the requirements of Section 10.05.2120 of the Millbrae Municipal Code and required to provide at least 19 bicycle parking spaces (10 percent of vehicle parking provided) for future hotel guests.

2.2.4 Landscaping

The proposed project would remove 75 trees from the project site, including 55 protected trees as defined by Section 9.45.040 of the Millbrae Municipal Code,[3] The proposed project would comply with the City's Tree Protection and Urban Forestry Program, Chapter 8.60 of the Millbrae Municipal Code, and would obtain a tree removal permit prior to removing any street trees. The City's Municipal Code does not specify a recommended tree replacement or mitigation ratio for trees removed on private property; however, Table 2.2-2 shows that the proposed project would result in a net increase of 315 trees onsite. Specifically, 12 Live Oak trees (likely London Plane trees) are proposed along Center Street.

Table 2.2-2. Proposed Tree Plan

Action	Non-Protected Trees	Protected Trees	Total
Removed	20	55	75
Relocated	11	-	11
Added	390	-	390
		Net Increase in Trees Onsite	**315**

Source: Arbor Resources 2020 (Appendix D)

Additionally, the proposed project would provide 53,010 square feet of new landscaping. The new landscape plantings would be placed along the El Camino Real and Center Street frontages, driveway entrances, pathways, and common open space areas. The new landscape plantings would consist of drought-resistant shrubs and shade trees in accordance with the City's Model Water Efficient Landscape Ordinance (City of Millbrae 2019).

2.2.5 Lighting

The proposed project would provide exterior lighting throughout the project site and three new street lights along Center Street. Exterior lighting would be provided to illuminate the building entrances, courtyards, pathways, driveways, parking garage, and landscape features for security and safety purposes. The proposed project would include standard exterior light fixtures up to 17 feet in height that would be shielded to reduce light spill or glare onto surrounding properties. All exterior lighting would be compliant with Title 24 California Green Building Standards (CALGREEN) requirements. The applicant would submit a lighting plan to the City for review prior to issuance of a

[3] A "Protected Tree," as defined by the Section 9.45.040 of the Millbrae Municipal Code is a healthy tree with a trunk or multiple trunks with a circumference of 19 inches, or more, measured at 24 inches about mean grade level.

building permit to ensure that all exterior lighting and any applicable signage lighting for the future hotel complies with the City and state requirements.

2.2.6 Utilities

The proposed project would connect to existing utilities in the vicinity of the project site in accordance with the requirements of the applicable utility providers. The following information is based on preliminary water supply, sewer capacity, and storm drain calculations prepared by BKF Engineers (Appendix A).

2.2.6.1 Water Supply

The project site is served by the City's water distribution system, which receives water from the San Francisco Public Utilities Commission (SFPUC). The proposed project would connect to the existing 6-inch waterline in Center Street and new water service laterals would be connected to the city water main per city standards, including fire, domestic and irrigation. The existing fire hydrant on Center Street near the planned parking garage entrance would be relocated. Table 2.2-3 shows the existing, proposed, and the increase (proposed minus existing use) in water supply needed to serve the proposed project.

Table 2.2-3. Water Supply

Project Characteristic	Project Demand Factor		Existing Consumption (gallons/day)	Proposed Consumption (gallons/day)	Increase in Use
Residential (384 units)	138.41	gpd/unit[3]	1,273[3]	61,122[4]	59,849
Residential Amenities[2] (8,000 square feet)	0.1	gpd/sf	--	920	920
		Residential Total	*1,273*	*62,042*	*60,769*
Future Hotel (200 Rooms)	200	gpd/room	50,600	46,000	-4,600
Meeting Room/Event Space	0.1	gpd/room	--	345	345
Future Restaurant [1]	41.7	gpd/seat	11,797	4,796	-7,001
		Future Hotel Total	*62,397*	*51,141*	*-11,256*
		Project Total	**63,670**	**113,183**	**49,513**

Notes:

1. Based on average 1 seat per 15 square feet of dining and approximately a 1,500 square foot dining/bar area.
2. Residential amenities are assumed to generate water demand similar to commercial space.
3. Based on average of 2.75 persons/unit and 50.3 gallons/day.
4. The proposed apartment complex would also include a 30,000-gallon swimming pool, which would be filled intermittently and is not included as part of the proposed project's average daily water demand.

gpd = gallons per day

sf = square feet

Source: BKF Engineers 2020 (Appendix A)

2.2.6.2 Wastewater

The City's Public Works Department is responsible for the regulation, collection, treatment, and disposal of wastewater from all residential and commercial sources within the City's service area. Sewage is primarily collected in gravity flow lines supplemented by three pumping stations and force mains that convey flows to the Millbrae Water Pollution Control Plant (WPCP) for treatment. The proposed project would connect to the existing 8-inch gravity main in Center Street. Two new sanitary sewer manholes would be installed on Center Street connecting to the main city sewer line. Table 2.2-4 shows the existing and proposed consumption, and the increase (proposed minus existing use) in wastewater generated by the proposed project.

Table 2.2-4. Wastewater Generated

Project Characteristic	Demand Factor[1]	Existing Consumption (gallons/day)	Proposed Consumption (gallons/day)	Increase in Use
Residential (384 units)	(0.85 x water demand)	1,107	53,149	52,042
Residential Amenities (8,000 square feet)	(0.85 x water demand)	--	800	800
	Residential Total	*1,107*	*53,949*	*52,842*
Future Hotel (200 rooms)	(0.85 x water demand)	44,000	40,000	-4,000
Meeting Room/Event Space	(0.85 x water demand)	--	300	300
Future Restaurant (2,500 square feet)	(0.85 x water demand)	10,258	4,170	-6,088
	Future Hotel Total	*54,258*	*44,470*	*-9,788*
	Project Total	**55,365**	**98,419**	**43,054**

Notes:
[1] Sewage Generation is based on 85 percent of indoor water demand projection.
Source: BKF Engineers 2020 (Appendix A)

2.2.6.3 Electricity and Natural Gas

Pacific Gas and Electric (PG&E) provides electricity and natural gas services to the project site. The proposed project would construct a joint trench to underground the existing electrical and telecommunications lines along Center Street and to remove the joint poles along Center Street along the project site frontage.

2.2.6.4 Stormwater

The project site is served by the City's storm drain system and has 255,286 square feet of impervious surface and 38,520 square feet of pervious surface. The proposed project would connect to the existing 42-inch storm drain line in Center Street. Three new storm drainage manholes would be installed on Center Street per City Standards and approximately 500 feed of 12-inch reinforced concrete pipe would be installed along Center Street and would tie into the City storm drain system toward San Anselmo Avenue.

The proposed project would create approximately 227,672 square feet of impervious surface. This would result in a net decrease of approximately 27,614 square feet of impervious surface on the project site. The proposed project would comply with the C.3 requirements of the San Mateo County Municipal Regional Stormwater Permit (MRP) and incorporate low impact development site design measures, which would direct runoff from roofs, sidewalks, walkways, and driveways onto vegetated areas. The proposed project would also provide 66,134 square feet of pervious surfaces consisting of bioretention basins and flow-through planters, which would collect and treat surface runoff prior to entering the piped storm drain system. The bioretention basins and flow-through planters would be located along Center Street and throughout the landscape areas across the project site.

2.2.7 Sustainability

The proposed project would comply with the Title 24 CALGREEN requirements by incorporating building materials, LED fixtures, ENERGY STAR®-rated appliances, and landscaping that promotes energy efficiency and water conservation. The proposed apartment complex would also be solar-ready and comply with the City's Building Code and prepare the proposed apartment complex for installation of rooftop solar panels.

The applicant has also prepared a Transportation Demand Management (TDM) Plan in accordance with the requirements of the City/County Association of Governments of San Mateo County and would implement a number of voluntary measures including, but not limited to bicycle parking, a business center to facilitate telecommuting, installation of transportation kiosks, unbundled parking, and a TDM contact person/transportation coordinator. The TDM measures would promote walking, bicycling, telecommuting, and use of transit and other transportation alternatives.

2.3 Project Construction

2.3.1 Construction Schedule

Project construction activities for the proposed apartment complex would start once all rental leases for the current residents have ended. All leases are on a month-to-month agreement and would be terminated 2 months prior to the start of construction. Project construction would be completed in two phases, although construction of the residential and hotel may overlap. As shown in Tables 2.3-1 and 2.3-2, it is anticipated that construction of the proposed apartment complex would begin in 2023 and be completed by 2026 (3 years of construction anticipated). It is anticipated that construction of the hotel would take approximately 15 months to complete, starting in 2024 and ending in 2026. Construction of other site improvements, including utility connections, pedestrian walkways, and internal access driveways, would occur concurrently as the apartment complex and hotel are built. As such, full buildout of the project site is expected by 2026.

Table 2.3-1. Phase 1 – Construction Schedule for Apartment Complex

Phase Name	Phase Start Date	Phase End Date	Peak Number of Construction Workers
Demolition	4/2023	5/2023	25
Site Preparation	4/2023	10/2023	10
Foundations	6/2023	2/2024	15
Building Construction	2/2024	2/2026	150
Paving	2/2026	4/2026	15

Table 2.3-2. Phase 2 – Construction Schedule for Future Hotel

Phase Name	Phase Start Date	Phase End Date	Peak Number of Construction Workers
Site Preparation	2/2024	7/2024	10
Foundations	7/2024	9/2024	15
Building Construction	9/2024	2/2026	100
Paving	1/2026	2/2026	15

Project construction activities would be consistent with Chapter 9.05 of the Millbrae Municipal Code and may occur between the following hours, unless otherwise authorized by the City's Building Official:

- Monday through Friday; 7:30 a.m. to 7:00 p.m.
- Saturday; 8:00 a.m. to 6:00 p.m.
- Sunday and Holidays; 9:00 a.m. to 6:00 p.m.

Depending on the construction phase, the number of temporary construction workers would range from 10 to 150 workers per day. It is anticipated that the construction workforce would be available from nearby areas.

2.3.2 Construction Equipment, Access, and Staging Areas

Construction workers would access the project site from El Camino Real, Center Street, and Highway 101. The proposed project would require the use of heavy equipment for demolition and building construction. The largest pieces of equipment used during each phase would include but not be limited to rubber-tired dozers, tractors, loaders, backhoes, excavators, cement mixers, graders, and pavers. No pile driving is proposed.

Project equipment and materials would be staged onsite during construction. Construction activities would mostly occur within the project site; however, activities would temporarily extend as far as the centerline of Center Street to construct off-site improvements. Construction of the off-site improvements would require temporary street and sidewalk closures. The proposed project would implement a traffic and pedestrian control plan, as required by the City's Encroachment Permit, to divert vehicle and pedestrian traffic.

2.3.3 Grading and Construction Activities

Construction activities associated with the proposed project would require demolition of existing structures, removal of onsite vegetation and impervious surfaces, grading, utility connections, building construction, frontage improvements (e.g., new curb, gutter, sidewalk, and driveway construction), and landscaping on the site.

The project site is relatively flat, but generally dips to the east from El Camino Real with an elevation ranging from about 30 to 15 feet. Construction of the proposed project would increase portions of the project site by 8 to 10 feet to create a less sloped site. As discussed in the geotechnical study, the proposed project contains undocumented fill and expansive clay soils from 3 to 9 feet below ground surface (bgs). The proposed project does not include sub-surface structures; however, the proposed project would excavate the project site to a maximum depth of 9 feet to replace the undocumented fills and clay soils with engineered fill (ENGEO 2020). As such, the proposed project is estimated to export approximately 5,022 cubic yards of soil and import approximately 26,734 cubic yards of soil on the site. During excavation activities, groundwater may be encountered at the project site at 5 feet bgs and temporary construction dewatering may be necessary. All temporary construction dewatering would be in accordance with a Waste Discharge Requirement permit from the San Francisco Bay Regional Water Quality Control Board (RWQCB). Demolished materials would be disposed of off-site at a location determined by the project construction contractor during construction.

2.4 Project Objectives and Required Project Approvals

2.4.1 Objectives

The proposed project includes the following project objectives:

1. Redevelop an underutilized, infill site to allow for higher density housing in proximity to jobs and transit.
2. Redevelop the project site with a diversity of housing choices, including new multi-family apartment units, as well as affordable apartment units to very low-income households, to help the City meet its Regional Housing Needs Allocation (RHNA) obligations.
3. Locate higher density residential units near transit opportunities along El Camino Real and in proximity to the Millbrae BART/Caltrain Station.
4. Provide amenities, parking strategies, and TDM measures that promote walking, bicycling, telecommuting, and use of transit and other transportation alternatives.
5. Respect and enhance the surrounding neighborhood and community through quality design, materials, and landscaping.
6. Replace the existing inefficient surface parking lot of the hotel with a new, high-quality residential community compatible with the existing residential neighborhood along Center Street.
7. Implement sustainable building practices promoting energy and water efficiency.

8. Create opportunities for the activation of the Center Street frontage, including new landscaping and pedestrian improvements, and a series of community patios with outdoor seating.
9. Create a new high-quality apartment community with common open space, courtyards, fitness, pool, and other amenities for the enjoyment of all residents.
10. Redevelop the aging 1960s-era Best Western El Rancho Inn with new rental housing, including affordable housing, and a potential future new hotel with modern features and amenities that will help revitalize the El Camino corridor and contribute to the City's economic and fiscal health.

2.4.2 Approvals

This SCEA would be used by the City as the Lead Agency to evaluate the potential environmental impacts of the proposed project consisting of an apartment complex. Currently, the applicant is only seeking entitlements for the proposed apartment complex. The applicant may develop a future hotel on the remaining 1.2 acres and would submit a separate development application to the City. However, this SCEA has been prepared to evaluate the potential environmental impacts related to the development of the proposed apartment complex and the future hotel on the 6.7-acre project site. In the event the applicant decides to submit a separate development application to the City for the hotel, subsequent environmental review may be necessary to ensure that the potential environmental impacts for the final design of the hotel are adequately addressed and that it is consistent with the City's General Plan and Municipal Code. Therefore, the following approvals listed would only apply to the proposed apartment complex:

- Adoption of the SCEA: City of Millbrae
- Design Review Permit: City of Millbrae
- Lot Merger and Line Adjustment: City of Millbrae
- Master Sign Program: City of Millbrae
- National Pollutant Discharge Elimination System Permit: San Francisco Bay Regional Water Quality Control Board (RWQCB)

Other ministerial approvals such as City demolition and building-related permits and encroachment permits are also anticipated for development of the proposed apartment complex. Additionally, all work related to improvements and grading for the proposed apartment complex would be subject to the Millbrae Municipal Code, including the Zoning Ordinance, Building Code, and Fire Code.

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Chapter 3

SCEA Criteria and Transit Priority Project Consistency

3.1 Senate Bill 375

The State of California adopted SB 375, also known as "The Sustainable Communities and Climate Protection Act of 2008," which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California's greenhouse gas (GHG) emissions reduction mandates. SB 375 requires the state's 18 metropolitan planning organizations to incorporate a SCS into the regional transportation plans to achieve their respective region's GHG emission reduction targets set by the California Air Resources Board (CARB). Correspondingly, SB 375 provides various CEQA streamlining provisions for projects that are consistent with an adopted, applicable SCS and that meet certain objective criteria; one such CEQA streamlining tool is the SCEA.

The MTC and ABAG are the joint metropolitan planning organization for the San Francisco Bay Area region, including San Mateo County. On October 21, 2021, MTC and ABAG jointly adopted its third RTP/SCS known as Plan Bay Area 2050 (Plan Bay Area), which serves as an update to the 2017 Plan Bay Area RTP/SCS.

For the San Francisco Bay Area region, CARB has set GHG emissions reduction targets at a 7 percent reduction in per-capita emissions from cars and light-duty trucks by 2020, and a 19 percent reduction by 2035 relative to 2005 levels. The Plan Bay Area outlines strategies to meet or exceed the targets set by CARB. CARB is currently reviewing the Plan Bay Area to determine whether it would, if implemented, meet CARB's 2020 and 2035 GHG emission reduction targets.

3.2 Transit Priority Project Criteria

PRC Section 21155 sets forth the requirements for a project to qualify as a transit priority project as outlined below. To qualify, a project must meet the following:

1. Be consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in a SCS (see California PRC Section 21155[a]); and
2. Be a qualified "transit priority project" (as defined in California PRC Section 21155[b]).

The following information demonstrates that the proposed project is a qualified transit priority project pursuant to the requirements of PRC Sections 21155(a) and 21155(b) and, therefore, is eligible for certain CEQA streamlining benefits by way of preparing an SCEA for purposes of compliance with CEQA.

1. ***The project must be consistent with the general land use designation, density, building intensity,and applicable policies specified for the project area in either a sustainable communities strategy or alternative planning strategy.***

The project site is within the Millbrae Transit Station Area PDA (Figure 2) in the adopted 2050 Plan Bay Area, which is the SCS for the Bay Area as required by SB 375. The PDAs are areas where new development will support the needs of residents and workers in a pedestrian friendly environment

served by transit. Local jurisdictions, including the City of Millbrae, define the character of their PDAs according to existing conditions and future expectations as regional centers, city centers, suburban centers, and/or transit town centers. The Millbrae Transit Station Area is characterized as a Mixed-Use Corridor place type that is intended for medium intensity growth and is served by sub-regional transit (in some cases dedicated) and local transit (C/CAG 2017). The Millbrae Transit Station Area is expected to add approximately 2,420 housing units and 2,040 jobs between 2010 and 2040 (MTC/ABAG 2017). The proposed project would be consistent with the Millbrae Transit Station Area mixed-use corridor place type designation and would provide residential and commercial uses along the El Camino Real corridor. The proposed project would also be within the growth forecast assumptions for the Millbrae Transit Station Area PDA as it would provide 384 housing units and 94 new jobs.

Because the project site is located within and consistent with a PDA that is part of the land use growth footprint for the Plan Bay Area (Figure 2), the project is consistent with the land use and development assumptions within the Plan Bay Area. The project is also consistent with the other applicable strategies in the Plan Bay Area, as demonstrated below in Table 3.2-1. The Plan Bay Area does not explicitly include policies, but rather strategies related to housing, economic, transportation, and environment. In the absence of specific policies, this document addresses project consistency with the strategies included in the Plan Bay Area.

Table 3.2-1 includes a comparison of how the proposed project complies with applicable strategies in the Plan Bay Area. As demonstrated in Table 3.2-1, the proposed project is consistent with the applicable strategies in Plan Bay Area. Thus, the proposed project is consistent with the general land use designation, density, building intensity, and policies of the Plan Bay Area.

Table 3.2-1. Project Consistency with the Plan Bay Area

Strategies	Consistency Determination
Housing Strategies	
H1. Further strengthen renter protections beyond state law. Building upon recent tenant protection laws, limit annual rent increases to the rate of inflation, while exempting units less than 10 years old.	This strategy focuses on developing regional renter protections, which is beyond the scope of the proposed project. The proposed apartment complex would also be less than 10 years old and, thus, exempt from this strategy.
H2. Preserve existing affordable housing. Acquire homes currently affordable to low- and middle-income residents for preservation as permanently deed-restricted affordable housing.	This strategy focuses on developing regional affordable housing strategies, which is beyond the scope of the proposed project. The proposed apartment complex would include 19 affordable units at the very low-income level. Therefore, the proposed project would generally comply with the intent of this strategy.
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.	The proposed project would result in the production of 384 apartment units in a PDA. The project applicant is also seeking a density bonus by providing 5% of the units at the very-low income level per the State Density Bonus Law, California Government Code section 65915. Therefore, the project would comply with the intent of this strategy.

Strategies	Consistency Determination
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.	This strategy focuses on developing regional affordable housing strategies, which is beyond the scope of this project. The proposed apartment complex would include 19 affordable units at the very low-income level. Therefore, the project would generally comply with the intent of this strategy.
H5. Integrate affordable housing into all major housing projects. Require a baseline of 10-20% of new market-rate housing developments of five units or more to be affordable to low-income households.	The proposed apartment complex would include 19 affordable units at the very low-income level. Therefore, the project would generally comply with the intent of this strategy.
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.	The proposed project is not located on a site composed of aging malls or office parks. Therefore, this strategy is not applicable.
H7. Provide targeted mortgage, rental and small business assistance to Equity Priority Communities. Provide assistance to low-income communities and communities of color to address the legacy of exclusion and predatory lending, while helping to grow locally owned businesses.	This strategy focuses on developing targeted mortgage, rental and small business assistance to Equity Priority Communities, which is beyond the scope of this project. The proposed apartment complex would include 19 affordable units at the very low-income level. Therefore, the project would generally comply with the intent of this strategy.
H8. Accelerate reuse of public and community-owned land for mixed-income housing and essential services. Help public agencies, community land trusts and other non-profit landowners accelerate the development of mixed-income affordable housing.	The proposed project would result in the production of 384 apartment units in a PDA. The project applicant is also seeking a density bonus by providing 5% of the units at the very-low income level per the State Density Bonus Law, California Government Code section 65915. Therefore, the project would comply with the intent of this strategy.
Economic Strategies	
EC1. Implement a statewide universal basic income. Provide an average $500 per month payment to all Bay Area households to improve family stability, promote economic mobility and increase consumer spending	This strategy focuses on implementing a statewide universal basic income, which is beyond the scope of this project.
EC2. Expand job training and incubator programs. Fund assistance programs for establishing new businesses, as well as job training programs, primarily in historically disinvested communities.	This strategy focuses on expanding job training and incubator programs, which is beyond the scope of this project.
EC3. Invest in high-speed internet in underserved low-income communities. Provide direct subsidies and construct public infrastructure to ensure all communities have affordable access to high-speed internet.	This strategy focuses on investing in high-speed internet in underserved communities, which is beyond the scope of this project. The proposed project would improve the telecommunication facilities for future residents and hotel occupants.

Strategies	Consistency Determination
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.	The proposed project involves production of a transit-oriented residential development and future hotel within a PDA, near the El Camino Real corridor and SFO BART Station. As such, the project would generally comply with the intent of this strategy.
EC5. Provide incentives to employers to shift jobs to housing-rich areas well served by transit. Provide subsidies to encourage employers to relocate offices to housing-rich areas near regional rail stations.	The proposed project involves production of a transit-oriented residential development and future hotel within a PDA, near the El Camino Real corridor and SFO BART Station, which would provide support for regional rail stations. As such, the project would generally comply with the intent of this strategy.
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.	The proposed project would not be located on industrial lands. Therefore, this strategy does not apply.
Transportation Strategies	
T1. Restore, operate and maintain the existing system. Commit to operate and maintain the Bay Area's roads and transit infrastructure while reversing pandemic-related cuts to total transit service hours.	This strategy is focused on the regional transportation and transit system and, therefore, does not apply to the proposed project.
T2. Support community-led transportation enhancements in Equity Priority Communities. Provide direct funding to historically marginalized communities for locally identified transportation needs.	This strategy is focused on the regional transportation and transit system and, therefore, does not apply to the proposed project.
T3. Enable a seamless mobility experience. Eliminate barriers to multi-operator transit trips by streamlining fare payment and trip planning while requiring schedule coordination at timed transfer hubs.	This strategy is focused on the regional transit system and, therefore, does not apply to the proposed project.
T4. Reform regional transit fare policy. Streamline fare payment and replace existing operator-specific discounted fare programs with an integrated fare structure across all transit operators.	This strategy is focused on the regional transit system and, therefore, does not apply to the proposed project.
T5. Implement per-mile tolling on congested freeways with transit alternatives. Apply a per-mile charge on auto travel on select congested freeway corridors where transit alternatives exist, with discounts for carpoolers, low-income residents, and off-peak travel; and reinvest excess revenues into transit alternatives in the corridor.	This strategy is focused on the regional freeway and transit system and, therefore, does not apply to the proposed project.
T6. Improve interchanges and address highway bottlenecks. Rebuild interchanges and widen key highway bottlenecks to achieve short- to medium-term congestion relief.	This strategy is focused on the regional transportation system and, therefore, does not apply to the proposed project.

Strategies	Consistency Determination
T7. Advance other regional programs and local priorities. Fund regional programs like motorist aid and 511 while supporting local transportation investments on arterials and local streets.	This strategy is focused on the regional transportation system and, therefore, does not apply to the proposed project.
T8. Build a Complete Streets network. Enhance streets to promote walking, biking and other micro-mobility through sidewalk improvements, car-free slow streets, and 10,000 miles of bike lanes or multi-use paths.	This strategy is focused on the regional transportation system and, therefore, does not apply to the proposed project. Nonetheless, the proposed project includes improvements to sidewalks surrounding the project site.
T9. Advance regional Vision Zero policy through street design and reduced speeds. Reduce speed limits to between 20 and 35 miles per hour on local streets and 55 miles per hour on freeways, relying on design elements on local streets and automated speed enforcement on freeways.	This strategy is focused on the regional transportation system and, therefore, does not apply to the proposed project.
T10. Enhance local transit frequency, capacity and reliability. Improve the quality and availability of local bus and light rail service, with new bus rapid transit lines, South Bay light rail extensions, and frequency increases focused in lower-income communities.	This strategy is focused on the regional transit system and, therefore, does not apply to the proposed project. It is noted that the project, by introducing additional residents near the El Camino Real corridor and SFO BART Station, would provide expanded support for enhancements to local transit frequency, capacity and reliability.
T11. Expand and modernize the regional rail network. Better connect communities while increasing frequencies by advancing the Link21 new transbay rail crossing, BART to Silicon Valley Phase 2, Valley Link, Caltrain Downtown Rail Extension and Caltrain/High-Speed Rail grade separations, among other projects.	This strategy is focused on the regional rail network, and, therefore, does not apply to the proposed project. It is noted that the project, by introducing additional residents near the SFO BART Station, would provide expanded support for expanding and modernizing the regional rail network.
T12. Build an integrated regional express lanes and express bus network. Complete the buildout of the regional express lanes network to provide uncongested freeway lanes for new and improved express bus services, carpools and toll-paying solo drivers.	This strategy is focused on the regional roadway and transit system and, therefore, does not apply to the proposed project.
Environmental Strategies	
EN1. Adapt to sea level rise. Protect shoreline communities affected by sea level rise, prioritizing low-cost, high-benefit solutions and providing additional support to vulnerable populations.	This strategy is regionally focused and, therefore, beyond the scope of this project. Because the proposed project would involve infill redevelopment within a PDA, the project would not conflict with this strategy. Therefore, the project would generally comply with this strategy.
EN2. Provide means-based financial support to retrofit existing residential buildings. Adopt building ordinances and incentivize retrofits to existing buildings to meet higher seismic, wildfire, water and energy standards, providing means-based subsidies to offset associated costs.	The proposed project would construct a new residential building and a potential future hotel that meets higher seismic, wildfire, water and energy standards. Therefore, the proposed project would generally comply with the intent of this strategy.

Strategies	Consistency Determination
EN3. Fund energy upgrades to enable carbon neutrality in all existing commercial and public buildings. Support electrification and resilient power system upgrades in all public and commercial buildings.	The proposed project would construct a new residential building and a potential future hotel that would comply with the Title 24 CALGREEN requirements by incorporating building materials, LED fixtures, ENERGY STAR®-rated appliances, and landscaping that promotes energy efficiency and water conservation. The proposed apartment complex would also be solar-ready and comply with the City's Building Code and would prepare the proposed apartment complex for installation of rooftop solar panels. Therefore, the proposed project would generally comply with the intent of this strategy.
EN4. Maintain urban growth boundaries. Using urban growth boundaries and other existing environmental protections, focus new development within the existing urban footprint or areas otherwise suitable for growth, as established by local jurisdictions.	The proposed project would involve infill redevelopment within a PDA. Therefore, the project would comply with this strategy.
EN5. Protect and manage high-value conservation lands. Provide strategic matching funds to help conserve and maintain high-priority natural and agricultural lands, including but not limited to, Priority Conservation Areas and wildland-urban interface areas.	The proposed project would involve infill redevelopment within a PDA. Therefore, the project would comply with this strategy.
EN6. Modernize and expand parks, trails and recreation facilities. Invest in quality parks, trails and open spaces that provide inclusive recreation opportunities for people of all backgrounds, abilities and ages to enjoy.	The proposed project would include approximately 90,670 square feet of common open space and approximately 6,858 square feet of onsite recreational amenities for residents and guests (not including amenities associated with the potential future hotel that would only be available to hotel guests during their stay). In addition, the proposed project would implement Mitigation Measure REC-1, which would require the payment of an in-lieu fee to be used to maintain parks. Therefore, the project would comply with this strategy.
EN7. Expand commute trip reduction programs at major employers. Set a sustainable commute target for major employers as part of an expanded Bay Area Commuter Benefits Program, with employers responsible for funding incentives and disincentives to shift auto commuters to any combination of telecommuting, transit, walking and/or bicycling.	The proposed project is not considered a major employer. Nonetheless, a TDM Plan was prepared and includes bicycle parking, a business center to facilitate telecommuting, installation of transportation kiosks, unbundled parking, and a TDM contact person/transportation coordinator. Therefore, the project would comply with this strategy.
EN8. Expand clean vehicle initiatives. Expand investments in clean vehicles, including more fuel-efficient vehicles and electric vehicle subsidies and chargers.	The proposed project includes 17 spaces equipped with charging stations for electric vehicles. Therefore, the project would comply with this strategy.

Strategies	Consistency Determination
EN9. Expand transportation demand management initiatives. Expand investments in programs like vanpools, bikeshare, carshare and parking fees to discourage solo driving.	The proposed project prepared a TDM Plan and includes bicycle parking, a business center to facilitate telecommuting, installation of transportation kiosks, unbundled parking, and a TDM contact person/transportation coordinator. Therefore, the project would comply with this strategy.

Source: Metropolitan Transportation Commission and Association of Bay Area Governments. Plan Bay Area 2050.

2. ***Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;***

The proposed project involves development of an apartment complex with 384 units on 5.5 acres of the project site, and a 200-room hotel on the remaining 1.2 acres. The proposed apartment complex would be approximately 397,272 gsf, and the future hotel would be approximately 205,000 gsf. The proposed apartment complex would be the primary project component and would represent approximately 82 percent of the 6.7-acre project site. Therefore, the proposed project would be consistent with this criterion.

3. ***Provides a minimum net density of at least 20 units per acre; and***

The proposed project would provide 384 residential units on 6.7 acres of the project site. As such, the proposed project would provide 69 units per acre (384 dwelling units [du] ÷ 6.7 acres) and would be consistent with this criterion.

4. ***Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.***

PRC Section 21155(b) defines a "high-quality transit corridor" as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

PRC Section 21064.3 defines a "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21155(b) states that a "major transit stop" is defined in PRC Section 21064.3, except that, for purposes of Section 21155(b), it also includes major transit stops that are included in the applicable regional transportation plan.

The Millbrae Transit Station Area PDA is a "Transit-Rich PDA" whereby at least 50 percent of the area within the PDA is within 0.5 mile of an existing rail station or ferry terminal (with bus or rail service), a bus stop with peak service frequency of 15 minutes or less, or a planned rail station or planned ferry terminal (with bus or rail service) in the most recently adopted fiscally constrained Regional Transportation Plan (MTC 2021).

The project site is adjacent to the El Camino Real corridor, which is a high-quality transit corridor as the SamTrans ECR bus route provides bus transit service along the El Camino Real corridor and arrives every 15 minutes during weekdays. The ECR bus route stops at the Millbrae BART/Caltrain station, the Palo Alto Transit Center, the Daly City BART station, and SFO. The bus stops closest to the project site are located at the intersection of El Camino Real and Center Street, approximately 120 feet from the project site (Figure 3).

Additionally, the project site is located 0.5 mile from the SFO BART station (Figure 3). The SFO BART station is a major transit stop as it provides rail transit service throughout the Bay Area. The SFO BART station is accessible from SamTrans bus routes 292, 397, 398, and ECR. Therefore, the proposed project is within 0.5 mile of a high-quality transit corridor and a major transit stop, and would be consistent with this criterion.

3.3 Previous Relevant Environmental Analysis

PRC Sections 21151.2(a) and 21159.28(a) require that a transit priority project incorporate all relevant and applicable feasible mitigation measures, performance standards, and criteria from prior applicable EIRs, which for the proposed project would include the City of Millbrae General Plan EIR and the Plan Bay Area Program EIR. As discussed below, all relevant and applicable feasible mitigation measures from the City of Millbrae General Plan EIR and the Plan Bay Area Program EIR are incorporated by reference throughout this document.

3.3.1 City of Millbrae General Plan EIR

In October 1998, the City certified a Master EIR for the 1998 General Plan in accordance with Section 15175 of CEQA. The purpose of the Master EIR is to identify and evaluate the potential environmental impacts of the General Plan. The Master EIR is intended to streamline the later environmental review projects or approvals analyzed within the Master EIR. Accordingly, the Master EIR shall, to the greatest extent feasible, evaluate the cumulative impacts, growth-inducing impacts, and irreversible significant effects on the environment of subsequent projects that are within the scope of the Master EIR. The Master EIR identifies General Plan policies that would mitigate significant impacts at the program level. Therefore, future development projects in the city are still subject to project-level CEQA review and evaluated for consistency with the City of Millbrae General Plan and other City regulations. However, the proposed project would be subject to all relevant policies through the City's development review process. As such, General Plan policies applicable to the proposed project have been incorporated into the respective resource sections in Section 4.0, Environmental Checklist and Environmental Evaluation.

3.3.2 Plan Bay Area EIR

In October 2021, MTC/ABAG certified a program EIR for the Plan Bay Area. The Plan Bay Area EIR serves as an informational document to inform decision-makers and the public of the potential environmental consequences of approving the Plan Bay Area. The Plan Bay Area EIR includes mitigation measures designed to help avoid or minimize significant environmental impacts. It is the intent of MTC/ABAG that lead agencies and others use the information contained within the Plan Bay Area Program EIR in order to "tier" subsequent environmental documentation of projects in the region.

The MMRP for the Plan Bay Area EIR does not include project level mitigation measures that are required to be incorporated into a project. However, the Plan Bay Area EIR MMRP does provide a list of mitigation measures that MTC/ABAG determined a lead agency can and should consider, as applicable and feasible, where the lead agency has concluded that a project has the potential to result in significant effects.

As such, this SCEA incorporates relevant mitigation measures previously identified by the Plan Bay Area EIR, where applicable. If incorporation of an applicable Plan Bay Area mitigation measure is insufficient to ensure a less-than-significant impact, or if no Plan Bay Area mitigation measures would apply, then a project-specific mitigation measure would be implemented to ensure a less-than-significant impact. The applicable mitigation measures previously identified by the Plan Bay Area EIR are incorporated in the respective resource sections in Section 4.0, Environmental Checklist and Environmental Evaluation.

3.4 Senate Bill 743

Pursuant to SB 743, effective January 1, 2014, "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects if it meets all of the following three criteria:

- The project is in a transit priority area;
- The project is on an infill site; and
- The project is residential, mixed-use residential, or an employment center.

The proposed project meets the above three criteria under SB 743. PRC Section 21099 defines a "transit priority area" as an area within 0.5-mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." The proposed project is located within the Millbrae Transit Station Area PDA (Figure 3), which is a "Transit-Rich PDA" whereby at least 50 percent of the area within the PDA is within 0.5 mile of an existing rail station or ferry terminal (with bus or rail service), a bus stop with peak service frequency of 15 minutes or less, or a planned rail station or planned ferry terminal (with bus or rail service) in the most recently adopted fiscally constrained Regional Transportation Plan (MTC 2021). The project site is located adjacent to the El Camino Real corridor, which is a high-quality transit corridor as the SamTrans ECR bus route provides service along the El Camino Real corridor with stops every 15 minutes during weekdays. Additionally, the project site is located 0.5 mile from the SFO BART station, which is a major transit stop as it provides rail transit service throughout the Bay Area. SamTrans bus routes 292, 397, 398, and ECR provide bus transit service to the SFO BART station (Figure 3). Therefore, the proposed project is within a transit priority area as defined by PRC Section 21099.

The proposed project meets the other two SB 743 criteria as it is located on an infill site that is currently developed with the El Rancho Inn and two residential buildings, and consists of a residential project. Therefore, this SCEA does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA. However, further provisions of SB 743 provide that this legislation does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies (PRC Section 21099[d][2][A]), and that aesthetic impacts do not include impacts on historical or cultural resources (Section 21099[d][2][B]). Public and decision-makers may be interested in information pertaining to the aesthetic character and parking of the proposed project and may desire that such information be provided as part of the

environmental review process. Therefore, some of the information that would have otherwise been provided in an aesthetics section (such as the project design and building elevations) or transportation section is included in Section 2.0, Project Description. However, this information is provided solely for informational purposes and is not used to determine the significance of the environmental impacts of the proposed project, pursuant to CEQA.

Chapter 4
Environmental Checklist and Environmental Evaluation

The environmental resources checked below would be potentially affected by this proposed project, involving at least one impact that would require mitigation to reduce the impact from "Potentially Significant" to "Less Than Significant" as indicated by the checklist on the following pages.

☐ Agriculture and Forestry Resources	☒ Air Quality	☒ Biological Resources
☒ Cultural Resources	☐ Energy	☒ Geology and Soils
☐ Greenhouse Gases	☒ Hazards and Hazardous Materials	☒ Hydrology and Water Quality
☐ Land Use and Planning	☐ Mineral Resources	☒ Noise
☐ Population and Housing	☐ Public Services	☒ Recreation
☒ Transportation	☒ Tribal Cultural Resources	☒ Utilities and Service Systems
☐ Wildfire	☒ Mandatory Findings of Significance	

Evaluation of Environmental Impacts

This section presents the environmental checklist form presented in Appendix G of the CEQA Guidelines. The checklist form is used to describe the impacts of the proposed project. A discussion follows each environmental issue identified in the checklist. Included in each discussion are project-specific mitigation measures recommended as appropriate as part of the proposed project.

For this checklist, the following designations are used:

- **Potentially Significant**: An impact that could be significant, and for which mitigation has not been identified. If any potentially significant impacts are identified, an EIR must be prepared. An SCEA cannot be used in the case of a project for which this conclusion is reached in any impact category.
- **Less Than Significant with Mitigation Incorporated**: This designation applies where relevant and applicable feasible mitigation measures previously identified in prior applicable EIRs have reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact," and pursuant to Section 21155.2 of the PRC, those measures are incorporated into the SCEA.

  This designation would also apply where the incorporation of new project-specific mitigation measures not previously identified in prior applicable EIRs would reduce an effect from "Potentially Significant Impact" to a "Less Than Significant Impact."
- **Less Than Significant Impact**: Any impact that would not be considered significant under CEQA, relative to existing standards.
- **No Impact**: The proposed project would not have any impact.

Determination

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the applicant. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

☒ I find that the proposed project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the PRC, and/or a qualified "residential or mixed use residential project" that satisfies the requirements of Section 21159.28(d) of the PRC, and although the project could have a potentially significant effect on the environment, there will not be a significant effect in this case, because this SCEA Initial Study identifies measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the proposed project.

Jim Fielding
Signature

1/10/22
Date

4.1 Agricultural and Forestry Resources

	Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forestland (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))?	☐	☐	☐	☒
d)	Result in the loss of forestland or conversion of forestland to non-forest use?	☐	☐	☐	☒
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?	☐	☐	☐	☒

4.1.1 Environmental Setting

The project site is located within an urbanized area of Millbrae and is developed with existing residential and hotel uses. According to the City's General Plan and Zoning Maps, there are no lands within the City that are designated or zoned for agriculture, forest land, or timberland production (City of Millbrae 1998b, 2009).

4.1.2 Previous Environmental Analysis

4.1.2.1 City of Millbrae General Plan EIR Summary

The City does not contain any agriculture or forestry resources within its limits; therefore, there are no mitigation measures from the General Plan EIR that would apply to the proposed project.

4.1.2.2 Plan Bay Area EIR Summary

The Plan Bay Area EIR determined that land use and transportation projects have the potential to convert agricultural and open space lands to urban uses. Conversion could be substantial within a county or local municipality depending on the location (MTC/ABAG 2021). The City does not contain

any agriculture or forestry resources within its limits; therefore, Mitigation Measures AGF-1 through AGF-3 from the Plan Bay Area EIR would not apply to the proposed project.

4.1.3 Project-Specific Analysis

Impact AG-1: 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 non-agricultural use?

Impact Analysis

The proposed project is located in a highly urbanized portion of the City. There are no agricultural resources on or adjoining the project site. According to the California Department of Conservation Important Farmland Finder Map, the project site is designated "Urban and Built-up Land" and does not contain agricultural lands (DOC 2019). As such, the proposed project would not result in the conversion of Prime, Unique, or Farmland of Statewide Importance. No impact would occur.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

Impact AG-2: Conflict with Existing Zoning for Agricultural Use or a Williamson Act Contract?

Impact Analysis

There are no lands within the City zoned for agriculture uses or enrolled in a Williamson Act contract (City of Millbrae 2009, San Mateo County 2013). Therefore, the proposed project would not conflict with the site's existing zoning or with a Williamson Act contract. No impact would occur.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

Impact AG-3: Conflict with existing zoning for, or cause rezoning of, forestland (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))?

Impact Analysis

The project site is developed with existing residential and hotel uses and does not contain forestland (as defined in PRC Section 12220[g]), or timberland (as defined by PRC Section 4526). The project site is not zoned Timberland Production (as defined by Government Code Section 51104[g]), and the proposed project would not result in changing the zoning or land use designation to allow for timberland production. As such, the proposed project would not convert forestland or timberland to a non-agricultural use, and no impact would occur.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

Impact AG-4: Result in the Loss of Forestland or Conversion of Forestland to Non-Forest Use?

Impact Analysis

The project site is developed with existing residential and hotel uses and does not contain forestlands. Therefore, the proposed project would not result in the loss of forestland or the conversion of forestland to non-forest use. No impact would occur.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

Impact AG-5: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?

Impact Analysis

The project site does not contain lands with prime farmland, unique farmland, farmland of state importance, or farmland of local importance and is not enrolled in a Williamson Act contract. The project site is not zoned for forestland or timberland production and would not be rezoned for agricultural use. Therefore, the proposed project would not result in the conversion of farmland or forestland to a non-agricultural use and no impact would occur.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

4.2 Air Quality

	Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b)	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?	☐	☒	☐	☐
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?	☐	☐	☒	☐

4.2.1 Environmental Setting

The information in this section is summarized from the Air Quality and Greenhouse Gas Assessment (Appendix B) prepared for the proposed project by Illingworth and Rodkin, Inc on December 11, 2019 (updated August 20, 2020).

The City of Millbrae is in San Mateo County, which is within the boundaries of the San Francisco Bay Area Air Basin (SFBAAB) and under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD) and CARB. The Federal Clean Air Act (FCAA) establishes the framework for modern air pollution control. The FCAA, enacted in 1970 and amended in 1990, directs the United States Environmental Protection Agency (USEPA) to establish ambient air quality standards. These standards are divided into primary and secondary standards. Primary standards are set to protect human health, and secondary standards are set to protect environmental values, such as plant and animal life.

4.2.1.1 Air Pollutants of Concern

Criteria Pollutants and Precursors

High ozone levels are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NOx). These precursor pollutants react under certain meteorological conditions to form high ozone levels. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce ozone levels. The highest ozone level in the Bay Area occurs in the eastern and southern inland valleys that are downwind of air pollutant sources. High ozone levels aggravate respiratory and cardiovascular diseases, reduce lung function, and increase coughing and chest discomfort.

Particulate matter is another problematic air pollutant for the Bay Area. Particulate matter is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometer of less (PM_{10}) and fine particulate matter where particles have a diameter of 2.5 micrometers of less ($PM_{2.5}$). Elevated concentrations of PM_{10} and $PM_{2.5}$ are the result of both region-

wide (or cumulative) emissions and localized emissions. High particulate matter levels aggravate respiratory and cardiovascular diseases, reduce lung function, increase mortality (e.g., lung cancer), and result in reduced lung function in children (Illingworth 2020).

Toxic Air Contaminants

Toxic air contaminants (TACs) are air contaminants not included in the California Ambient Air Quality Standards (CAAQS) but are considered hazardous to human health. TACs are defined by CARB as those pollutants that "may cause or contribute to an increase in deaths or in serious illness, or which may pose a present or potential hazard to human health."

Generally, the health effects associated with TACs are assessed locally rather than regionally. TACs can cause long-term health effects such as cancer, birth defects, neurological damage, asthma, bronchitis, or genetic damage; TACs can also cause short-term acute effects such as eye watering, respiratory irritation, running nose, throat pain, and headaches. For evaluation purposes, TACs are separated into carcinogens and non-carcinogens. Carcinogens are assumed to have no safe threshold below which health impacts would not occur, and the cancer risk is expressed as excess cancer cases per one million exposed individuals (typically over a lifetime of exposure).

Diesel Particulate Matter

Diesel particulate matter (DPM) is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases: gas and particle. The gas phase is composed of many of the urban hazardous air pollutants, such as acetaldehyde, acrolein, benzene, 1,3-butadiene, formaldehyde, and polycyclic aromatic hydrocarbons. The particle phase also has many different types of particles that can be classified by size or composition. The size of diesel particulates that are of greatest health concern are those that are in the categories of fine and ultra-fine particles. The composition of these fine and ultra-fine particles may be composed of elemental carbon with adsorbed compounds such as organic compounds, sulfate, nitrate, metals, and other trace elements. Diesel exhaust is emitted from a broad range of diesel engines, such as the on-road diesel engines of trucks, buses, and cars, and off-road diesel engines that include locomotives, marine vessels, and heavy-duty equipment (CARB 2019a).

Asbestos

Asbestos is a fibrous mineral that both naturally occurs in ultramafic rock (a rock type commonly found in California) and is used as a processed component of building materials. Because asbestos has been proven to cause a number of disabling and fatal diseases, such as asbestosis and lung cancer, it is strictly regulated either based on its natural widespread occurrence or in its use as a building material. In the initial Asbestos National Emission Standards for Hazardous Air Pollutants rule promulgated in 1973, a distinction was made between building materials that would readily release asbestos fibers when damaged or disturbed (friable) and those materials that were unlikely to result in significant fiber release (non-friable). The USEPA has since determined that, when severely damaged, otherwise non-friable materials can release significant amounts of asbestos fibers. Asbestos has been banned from many building materials under the Toxic Substances Control Act, FCAA, and the Consumer Product Safety Act. Naturally occurring asbestos (NOA) is known to occur in many parts of California and is commonly associated with ultramafic or serpentinite rock. According to the U.S. Geological Survey (USGS) Geologic Map, the proposed project is not located in an area known to contain ultramafic or serpentinite rock (USGS 2011).

Formaldehyde

The Composite Wood Products Regulation (17 CCR 93120 et seq.) is a California Air Resources Board (CARB) regulation that reduces public exposure to formaldehyde through the establishment of strict emission performance standards on particleboard, medium density fiberboard and hardwood plywood (collectively known as composite wood products). The regulation, adopted in 2007, established two phases of emissions standards: an initial Phase I, and later, a more stringent Phase 2 that requires all finished goods, such as flooring, destined for sale or use in California to be made using complying composite wood products. As of January 2014, only Phase 2 products are legally for sale in California.

On December 12, 2016, EPA published in the Federal Register a final rule to reduce exposure to formaldehyde emissions from certain wood products produced domestically or imported into the United States. EPA worked with CARB to help ensure the final national rule was consistent with California's requirements for similar composite wood products. CALGREEN (CCR Title 24, Part 11) includes mandatory and voluntary measures for building materials, including formaldehyde emissions limits consistent with CARB's Composite Wood Products Regulation. (See CALGREEN Section 5.504.5 in the mandatory requirements for non-residential development.) As such, these products are commonly found in all residential and commercial buildings and concentrations of this product would be in compliance with state regulations and safe for building occupants.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Heightened sensitivity may be caused by health problems, proximity to the emissions source, and duration of exposure to air pollutants. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, childcare centers, playgrounds, retirement homes, convalescent homes, hospitals, and medical clinics. The closest existing sensitive receptors to the project site include single- and multi-family residences and a nursery school to the north of the project site opposite Center Street, within 60 feet of the project site. The proposed project would also introduce new sensitive receptors in the form of residences.

Air Quality Standards

According to CARB, "Federal clean air laws require areas with unhealthy levels of ozone, inhalable particulate matter, carbon monoxide, nitrogen dioxide, and sulfur dioxide to develop plans, known as State Implementation Plans (SIPs). A SIP is a prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain federal standards. The 1990 amendments to FCAA set deadlines for attainment based on the severity of an area's air pollution problem" (CARB 2019b).

The SIP for the State of 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 each regional air district. SIPs are prepared by the regional air district and 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.

CARB also administers CAAQS for the 10 air pollutants designated in the California Clean Air Act. The 10 state air pollutants are the 6 federal standards listed above as well as visibility-reducing particulates, hydrogen sulfide, sulfates, and vinyl chloride. The federal ambient air quality standards and CAAQS are summarized in Table 4.2-1.

Table 4.2-1. California and National Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[1]	National Standards[2]	
		Concentration	Primary[3]	Secondary[4]
Ozone[5]	1 Hour	0.09 ppm (180 µg/m^3)	—	Same as Primary Standard
	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)	
Respirable Particulate Matter[6]	24 Hour	50 µg/m^3	150 µg/m3	Same as Primary Standard
	Annual Arithmetic Mean	20 µg/m^3	—	
Fine Particulate Matter[6]	24 Hour	—	35 µg/m^3	Same as Primary Standard
	Annual Arithmetic Mean	12 µg/m^3	12 µg/m^3	
Carbon Monoxide	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	—
	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	—
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)	—	—
Nitrogen Dioxide	1 Hour	0.18 ppm (339 µg/m^3)	100 ppb (188 µg/m^3)	—
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)	Same as Primary Standard
Sulfur Dioxide[7]	1 Hour	0.25 ppm (655 µg/m^3)	75 ppb (196 µg/m^3)	—
	3 Hour	—	—	0.5 ppm (1300 µg/m^3)
	24 Hour	0.04 ppm (105 µg/m^3)	0.14 ppm (for certain areas)	—
	Annual Arithmetic Mean	—	0.030 ppm (for certain areas)	—
Lead[8, 9]	30-Day Average	1.5 µg/m^3	—	—
	Calendar Quarter	—	1.5 µg/m^3	Same as Primary Standard
	Rolling 3-Month Average	—	0.15 µg/m^3	

Pollutant	Averaging Time	California Standards[1]	National Standards[2]	
		Concentration	Primary[3]	Secondary[4]
Visibility-Reducing Particles[10]	8 Hour	See Footnote 1	No National Standards	
Sulfates	24 Hour	25 µg/m^3		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)		
Vinyl Chloride[8]	24 Hour	0.01 ppm (26 µg/m^3)		

Notes:

California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 702 00 of Title 17 of the California Code of Regulations.

National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m^3 to 12.0 µg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standard of 15 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

The CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

In 1989, the CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

µg/m^3 = micrograms per cubic meter

CARB = California Air Resources Board

mg/m^3 = milligrams per cubic meter

$PM_{2.5}$ = particulate matter 2.5 microns in diameter or less

PM_{10} = particulate matter 10 microns in diameter or less

ppb = parts per billion

ppm = parts per million

SO_2 = sulfur dioxide

Source: CARB 2019a

As summarized in Table 4.2-2, SFBAAB and San Mateo County are currently designated as nonattainment areas for state ozone, particulate matter 2.5 microns in diameter or less ($PM_{2.5}$), and particulate matter 10 microns in diameter or less (PM_{10}) standards, as well as federal ozone and $PM_{2.5}$ standards, but are listed as unclassified under national PM_{10} standards. The standards for carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead are being met in the Bay Area. Because SFBAAB is nonattainment for the federal and state ozone standards, BAAQMD has prepared an ozone attainment demonstration plan to satisfy the federal 1-hour zone planning requirement and a clean air plan to satisfy the state's 1-hour ozone planning requirement. The 2017 Clean Air Plan, which was adopted in April 2017, builds from and incorporates components of the 2010 Clean Air Plan and is designed to provide integrated control strategies to reduce ozone, particulate matter (PM), TACs, and GHGs.

Table 4.2-2. San Mateo County Area Designations for State and National Ambient Air Quality

Criteria Pollutants	State Designation	National Designation
Ozone	Non-attainment	Non-attainment
PM_{10}	Non-attainment	Unclassified
$PM_{2.5}$	Non-attainment	Non-attainment
Carbon Monoxide	Attainment	Unclassified/Attainment
Nitrogen Dioxide	Attainment	Unclassified/Attainment
Sulfur Dioxide	Attainment	Unclassified
Sulfates	Attainment	—
Lead	Attainment	Unclassified/Attainment
Hydrogen Sulfide	Unclassified	—
Visibility Reducing Particles	Unclassified	—

Notes:
$PM_{2.5}$ = particulate matter 2.5 microns in diameter or less
PM_{10} = particulate matter 10 microns in diameter or less
Source: CARB 2018

Nearly all development projects in the Bay Area have the potential to generate air pollutants that may increase the difficultly of attaining federal ambient air quality standards and CAAQS. Therefore, for most projects, evaluation of air quality impacts is required to comply with CEQA. To help public agencies evaluate air quality impacts, BAAQMD has developed the CEQA Air Quality Guidelines. BAAQMD's guide includes recommended thresholds of significance, including mass emission thresholds for construction-related and operational ozone precursors. The BAAQMD's guide also includes screening criteria for localized CO emissions and thresholds for new stationary sources of TACs (BAAQMD 2017).

Table 4.2-3 presents the thresholds of significance for reactive organic gases (ROG), nitrogen oxides (NOX), construction-related particulate matter, operational CO, and carbon dioxide equivalent (CO2e), which are based on substantial evidence, as presented in Appendix D of the BAAQMD's *2017 CEQA Air Quality Guidelines and 2009 Revised Draft Options and Justification Report, CEQA Thresholds of Significance*. The BAAQMD's CEQA Thresholds of Significance were developed as a result of substantial supreme court decisions, such as the Sierra Club v. County of Fresno (226 Cal. App. 4th 704) court case.

Table 4.2-3. 2017 BAAQMD Proposed Project-Level Air Quality CEQA Thresholds of Significance

Criteria Pollutants	Construction-Related	Operational-Related	
Criteria Air Pollutants and Precursors (regional)	**Average Daily Emissions (lbs/day)**	**Average Daily Emissions (lbs/day)**	**Maximum Annual Emissions (tpy)**
ROG	54	54	10
NO_x	54	54	10
PM_{10} (exhaust)	82	82	15
$PM_{2.5}$ (exhaust)	54	54	10
$PM_{10}/PM_{2.5}$ (fugitive dust)	Best Management Practices	None	
Local CO	None	9.0 ppm (8-hour average), 20.0 ppm (1-hour average)	
GHGs (projects other than stationary sources)	None	Compliance with Qualified GHG Reduction Strategy OR 1,100 $MTCO_2e/yr$ OR 4.6 $MTCO_2e/SP/yr$ (residents + employees)	

Notes:
CO = carbon monoxide
GHG = greenhouse gas
lbs/day= pounds per day
$MTCO_2e/yr$= metric tons of carbon dioxide equivalent per year
$MTCO_2e/SP/yr$= metric tons of carbon dioxide equivalent per service population per year
NO_X = nitrogen oxide
$PM_{2.5}$ = particulate matter 2.5 microns in diameter or less
PM_{10} = particulate matter 10 microns in diameter or less
ppm = parts per million
ROG = reactive organic gas
tpy= trips per year
Source: BAAQMD 2017

In its June 2009 *Thresholds of Significance Justification Report*, *CEQA Thresholds of Significance,* BAAQMD provides evidence to support the development and applicability of its thresholds of significance for project-generated emissions of criteria pollutants and precursors, which may be used at the discretion of a lead agency overseeing the environmental review of projects located within the San Francisco Bay Area Air Basin. As stated in the BAAQMD Justification Report, the "formulation of a standard of significance requires the lead agency to make a policy judgement about where the line should be drawn to distinguish adverse impacts it considers significant from those that are not deemed significant. This judgment must; however, be based on scientific information and other factual data to the extent possible" (BAAQMD 2009). Notably, CEQA-related air quality thresholds of significance are tied to achieving or maintaining attainment designation with the national air quality standards and state air quality standards, which are scientifically substantiated, numerical concentrations of criteria air pollutants considered to be protective of human health.

The BAAQMD has established rules and regulations to attain and maintain state and national air quality standards. The rules and regulations that apply to this proposed project include but are not limited to the following (BAAQMD 2009):

Regulation 2, Rule 5

New Source Review of Toxic Air Contaminants. This rule applies to preconstruction review of new and modified sources of toxic air contaminants, contains project health risk limits, and requires Toxics Best Available Control Technology.

Regulation 6, Rule 1

Particulate Matter. This rule restricts emissions of PM darker than No. 1 on the Ringlemann Chart to less than 3 minutes in any 1 hour.

Regulation 7

Odorous Substances. This regulation establishes general odor limitations on odorous substances and specific emission limitations on certain odorous compounds.

Regulation 8, Rule 3

Architectural Coatings. This rule governs the manufacture, distribution, and sale of architectural coatings and limits the ROG content in paints and paint solvents. Although this rule does not directly apply to the proposed project, 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 project, it does dictate the ROG 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 9, Rule 8

Stationary Internal Combustion Engines. This rule limits emissions of NO_X and CO from stationary internal combustion engines of more than 50 horsepower.

Regulation 11, Rule 2

Asbestos Demolition, Renovation, and Manufacturing. This rule controls emissions of asbestos to the atmosphere during demolition, renovation, milling, and manufacturing and establishes appropriate waste disposal procedures.

4.2.2 Previous Environmental Analysis

4.2.2.1 City of Millbrae General Plan EIR Summary

Chapter 4.5 of the General Plan Draft EIR evaluated the potential impacts of future development on ambient air quality and the potential for exposure of people, including sensitive receptors, to unhealthy pollutant concentrations. The General Plan EIR identified significant impacts with respect to construction activities and vehicle traffic (City of Millbrae 1998b). The General Plan EIR identified Mitigation Measure 4.5.1, which would include a policy in the General Plan to reduce construction

related PM_{10} emission impacts by requiring projects to incorporate BAAQMD's recommended dust control measures that would reduce impacts to a less-than-significant level, including:

a. All active construction areas shall be watered at least twice daily.

b. All trucks hauling soil, sand, and other loose materials shall be covered with tarpaulins or other effective covers.

c. All unpaved access roads, parking areas, and staging areas at the construction site shall be paved; otherwise, water or non-toxic soil stabilizers shall be applied to all unpaved access roads. In addition, paved access roads, parking areas, and staging areas shall be swept daily with a water sweeper. Streets shall be swept daily with a water sweeper in areas where visible soil material is carried onto adjacent public streets.

d. Inactive construction areas, including previously graded areas inactive for at least ten days, shall be hydroseeded or applied with a non-toxic soil stabilizer.

e. Exposed stockpiles shall be enclosed, covered, and watered twice daily (or applied with a nontoxic soil binder).

f. The speed of all vehicles driving on unpaved road shall be limited to 15 miles per hour (mph).

g. To prevent silt runoff to public roadways, sandbags or other erosion control measures shall be implemented.

h. Disturbed areas shall be replanted with vegetation as quickly as possible.

i. Wheel washers shall be installed and used to clean all trucks and equipment leaving the construction site. If wheel washers cannot be installed, tires or tracks of all trucks and equipment shall be washed off before leaving the construction site.

j. Wind breaks or tree wind breaks shall be installed/planted on windward sides of construction areas.

k. Excavation and grading activities shall be terminated when winds exceed 25 mph.

l. Limit the area subject to excavation, grading, and other construction activities at any one time.

The General Plan EIR also identified Mitigation Measure 4.5.2, which would require projects to incorporate the following measures to reduce exhaust emissions from construction-related equipment to a less-than-significant level:

a. The idling time of all construction equipment used at the site shall not exceed five minutes.

b. Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use.

c. All equipment shall be properly tuned and maintained in accordance with the manufacturer's specifications.

d. When feasible, alternative fueled or electrical construction equipment shall be used at the project site.

e. Use the minimum practical engine size for construction equipment.

f. Gasoline-powered equipment shall be equipped with catalytic converters, where feasible.

4.2.2.2 Plan Bay Area EIR Summary

The following summarizes the potential air quality impacts discussed in Chapter 3.4 of the Plan Bay Area EIR and includes the complete text of mitigation measures previously identified by the Plan Bay Area EIR that are applicable to the proposed project.

Impact AQ-1: Applicable Air Quality Plan. The Plan Bay Area EIR analyzed the potential impact related to conflicting with or obstructing implementation of an applicable air quality plan, which includes the BAAQMD 2017 Clean Air Plan and determined there would be a less-than-significant impact. No mitigation measures were identified.

Impact AQ-2: Net Increase in Construction-Related Emissions. The Plan Bay Area EIR analyzed the potential impact related to substantial increase in construction-related emissions and determined that, with implementation of Plan Bay Area EIR Mitigation Measure AQ-2, the impact would be less than significant (refer to Impact AIR-1 in Section 4.3.3, Project-Specific Analysis). Projects using CEQA streamlining provisions of SB 375 must apply Mitigation Measure AQ-2 to address site-specific conditions.

PBA EIR MM AQ-2: Implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

When applicable screening levels set by the relevant air district are exceeded, implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

Construction Best Practices for Exhaust

- The applicant/general contractor for the project shall submit a list of all off-road equipment greater than 25 horsepower (hp) that would be operated for more than 20 hours over the entire duration of project construction, including equipment from subcontractors to the relevant air district (e.g., BAAQMD, NSCAPCD, or YSAQMD) for review and certification. The list shall include all information necessary to ensure the equipment meets the following requirement:
    - Equipment shall be zero emissions or have engines that meet or exceed either EPA or CARB Tier 4 off-road emission standards, and it shall have engines that are retrofitted with a CARB Level 3 Verified Diesel Emissions Control Strategy (VDECS), if one is available for the equipment being used. Equipment with engines that meet Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement; therefore, a VDECS would not be required.
    - Idling time of diesel-powered construction equipment and trucks shall be limited to no more than 2 minutes. Clear signage of this idling restriction shall be provided for construction workers at all access points.
    - All construction equipment shall be maintained and properly tuned in accordance with the manufacturers' specifications.
    - Portable diesel generators shall be prohibited. Grid power electricity should be used to provide power at construction sites; or propane and natural gas generators may be used when grid power electricity is not feasible.

Construction Best Practices for Dust

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. For projects over 5 acres in size, soil moisture should be maintained at a minimum of 12 percent. Moisture content can be verified by lab samples or a moisture probe.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- Onsite dirt piles or other stockpiled PM shall be covered, wind breaks installed, and water and/or soil stabilizers employed to reduce wind-blown dust emissions. The use of approved nontoxic soil stabilizers shall be incorporated according to manufacturers' specifications to all inactive construction areas.
- 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. Dry power sweeping should only be performed in conjunction with thorough watering of the subject roads.
- All vehicle speeds on unpaved roads and surfaces shall be limited to 15 mph.
- All roadway, driveway, and sidewalk paving shall be completed as soon as possible. Building pads shall be paved as soon as possible after grading.
- All construction sites shall provide a posted sign visible to the public with the telephone number and person to contact at the lead agency regarding dust complaints. The recommended response time for corrective action shall be within 48 hours. BAAQMD's Complaint Line (1-800-334-6367) shall also be included on posted signs to ensure compliance with applicable regulations.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.
- Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
- The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.
- All transfer processes involving a free fall of soil or other PM shall be operated in such a manner as to minimize the free fall distance and fugitive dust emissions.
- All trucks and equipment, including their tires, shall be washed off before leaving the site.
- Site accesses to a distance of 100 feet from the paved road shall be treated with a 6-to 12-inch compacted layer of wood chips, mulch, or gravel.
- Sandbags or other erosion-control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than 1 percent.

- Open burning shall be prohibited at the project site. No open burning of vegetative waste (natural plant growth wastes) or other legal or illegal burn materials (e.g., trash, demolition debris) may be conducted at the project site. Vegetative wastes shall be chipped or delivered to waste-to-energy facilities (permitted biomass facilities), mulched, composted, or used for firewood. It is unlawful to haul waste materials off-site for disposal by open burning.
- The primary contractor shall be responsible for ensuring that all construction equipment is properly tuned and maintained before and for the duration of onsite operation.
- Where accessible, existing power sources (e.g., power poles) or clean-fuel generators shall be used rather than temporary power generators.
- A traffic plan shall be developed to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Operations that affect traffic shall be scheduled for off-peak hours. Obstruction of through-traffic lanes shall be minimized. A flag person shall be provided to guide traffic properly and ensure safety at construction sites

Applicable mitigation measures shall be required at the time grading permits are issued.

Impact AQ-3: Cumulative Net Increase in Emissions of Criteria Pollutants. The Plan Bay Area EIR analyzed the potential impacts related to a cumulative net increase in emissions of criteria pollutants compared to existing conditions. The Plan Bay Area EIR determined that implementation of the proposed plan could result in a net decrease in ROG and NO_X CO emissions; however, it could also result in a net increase of $PM_{2.5}$ and PM_{10} emissions. The plan would result in a net increase of criteria pollutants from mobile and area-sources compared to existing conditions. The Plan Bay Area EIR identified Mitigation Measures AQ-3(a) through AQ-3(e) to reduce $PM_{2.5}$ and PM_{10} emissions from mobile and area-sources. The MTC/ABAG cannot require local implementing agencies to adopt some or all of Mitigation Measures AQ-3(a) through AQ-3(e); therefore, for the program-level review, this impact was determined to be significant and unavoidable. As discussed in Impact AIR-1, construction and operation of the proposed project would be below the BAAQMD 2017 significance thresholds for ROG and NO_X. Therefore, Mitigation Measures AQ-3(a) through AQ-3(e) would not be applicable to the proposed project.

Impact AQ-4: Expose sensitive receptors to substantial pollutant concentrations. Implementation of the Plan Bay Area could result in changes in TAC and/or $PM_{2.5}$ exposure levels that would expose sensitive receptors to substantial pollutant concentrations. These impacts would vary across counties. The Plan Bay Area EIR identified Mitigation Measures AQ-4(a) through AQ-4(d); however, the impact would remain significant and unavoidable. These Mitigation Measures are plan-level specific and are not applicable to the proposed project.

Impact AQ-5: Substantial Odors. As discussed in the Plan Bay Area EIR, objectionable odors associated with construction of the proposed plan would be regulated through BAAQMD regulations or would otherwise be temporary and be subject to local zoning ordinances as well as local air district permitting processes. Therefore, the Plan Bay Area EIR determined that impacts would be less than significant, and no mitigation measures were identified.

4.2.3 Project-Specific Analysis

The following analysis is based on the Air Quality and Greenhouse Gas Assessment (Appendix B) prepared for the project by Illingworth and Rodkin, Inc. on December 11, 2019 (updated August 20, 2020).[4] As of August 5, 2013, the BAAQMD requires the use of the California Emissions Estimator Model (CalEEMod) for CEQA-related air quality and GHG analyses. To assess potential air quality and GHG emissions generated form the proposed project, CalEEMod was run using estimations of project construction activities and predicted future operational emissions (Appendix B). The model was run using the following assumptions/project details:

4.2.3.1 Residential and Hotel Land Uses

- 384 dwelling units entered as "Apartments Mid Rise" on 5.56 acres
- 548 spaces entered as "Enclosed Parking with Elevator"
- 12 spaces entered as "Parking Lot"
- 200 rooms and 135,967 square feet (includes 2,500 square feet of restaurant space and 3,000 sf or meeting space) entered as "Hotel" on 1.17-acres
- 187 spaces and 69,533 square feet entered as "Enclosed Parking with Elevator."

4.2.3.2 Construction Hauling Information

- 45,683 square feet of building demolition
- 5,022 cy of soil exported
- 26,734 cy soil imported[5]

Construction for the proposed apartment complex would begin in April 2023 and would last approximately 36 months with a total of 784 workdays. Construction for the residences plus hotel would last approximately 44 months with a total of 957 workdays.

Impact AIR-1: Conflict with or obstruct implementation of the applicable air quality plan?

Impact Analysis

The BAAQMD's 2017 Clean Air Plan is the regional air quality plan (AQP) for SFBAAB. It identifies strategies to bring regional emissions into compliance with federal and state air quality standards. The BAAQMD's Guidance provides two criteria for determining if a plan-level project is consistent with the current AQP control measures. However, the BAAQMD does not provide a threshold of

[4] Construction modeling in the Air Quality and Greenhouse Gas Assessment was based on a construction start date of April 2021. Since this report was finalized, the construction start date has been updated to April 2023. This change does not affect the construction air quality analysis because construction equipment gets cleaner over time, thus reducing construction emissions. This analysis is, therefore, conservative.

[5] The demolition and site grading for the proposed apartment complex and future hotel projects would be completed during the construction phase for the proposed apartment complex.

significance for project-level consistency analysis. Therefore, the following criteria will be used for determining a project's consistency with the AQP.

- Criterion 1: Does the project support the primary goals of the AQP?
- Criterion 2: Does the project include applicable control measures from the AQP?
- Criterion 3: Does the project disrupt or hinder implementation of any AQP control measures?

Criterion 1

The primary goals of the 2017 Clean Air Plan, the current AQP to date, are as follows:

- Attain air quality standards.
- Reduce population exposure to unhealthy air and protecting public health in the Bay Area.
- Reduce GHG emissions and protect the climate.

The proposed project supports the primary goals of the AQP by providing a mixed-use, residential and commercial, pedestrian-oriented development within an existing urbanized community and adjacent to alternative transit infrastructure, jobs, housing, and community services.

Additionally, the proposed project's air quality modeling indicates that all emissions of criteria pollutants would be below the BAAQMD 2017 significance thresholds for construction and operation as shown in Tables 4.2-4 and 4.2-5.

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. Fugitive dust could potentially cause a significant impact, however, the BAAQMD CEQA Air Quality Guidelines consider dust impacts to be less than significant if best management practices (BMPs) are implemented to reduce these emissions. Therefore, construction of the proposed project would be consistent with Criterion 1 with the implementation of Mitigation Measure AIR-1 (PBA EIR MM AQ-2) which includes the BAAQMD construction best practices for dust.

Table 4.2-4. Construction Emissions for the Proposed Project

	Air Pollutants			
Parameter	**ROG**	**NO_X**	**PM_{10} (Exhaust)**	**$PM_{2.5}$ (Exhaust)**
Residences Only				
Total Construction Emissions (tons)	3.82	8.22	0.29	0.28
Average daily emissions (pounds/day)[1]	9.74	20.98	0.75	0.70
Hotel Only				
Total Construction Emissions (tons)	1.14	3.7	0.15	0.14
Average daily emissions (pounds/day)	13.18	42.77	1.73	1.62
Residences and Hotel				
Total Construction Emissions (tons)	4.96	11.92	0.44	0.42
Average daily emissions (pounds/day)	10.36	24.91	0.93	0.87
Significance Threshold (pounds/day)	54 lbs/day	54 lbs/day	82 lbs/day	54 lbs/day
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Notes:
[1] Based on 784 workdays
[2] Based on 173 workdays
Calculations use rounded totals.
lbs/day = pounds per day
NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns in diameter
$PM_{2.5}$ = particulate matter 2.5 microns in diameter
ROG = reactive organic gases
Source of thresholds: BAAQMD 2017
Source of emissions: CalEEMod Output (see Appendix B).

Table 4.2-5. Operational Emissions for the Proposed Project

	Air Pollutants			
Emissions Source	**ROG**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Residences Only				
2025 Residences Operational Emissions (tons/year)	2.67	0.97	1.78	0.51
2025 Existing Operational Emissions (tons/year)	1.63	0.88	0.46	0.16
Net Emissions (tons/year)	1.04	0.09	1.32	0.35
2025 Proposed Project Operational Emissions (lbs/day)[1]	14.64	5.51	9.77	2.77
Hotel Only				
2025 Hotel Operational Emissions (tons/year)	0.92	0.54	0.63	0.18
2025 Existing Operational Emissions (tons/year)	1.63	0.88	0.46	0.16
Net Emissions (tons/year)	-0.71	-0.34	0.17	0.02
2025 Proposed Project Operational Emissions (lbs/day)[1]	-3.9	-1.86	0.93	0.11

Emissions Source	Air Pollutants			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Residences and Hotel				
2025 Proposed Project Operational Emissions (tons/year)	3.59	1.55	2.41	0.69
2025 Existing Operational Emissions (tons/year)	1.63	0.88	0.46	0.16
Net Emissions (tons/year)	1.96	0.67	1.95	0.53
BAAQMD Thresholds (tons/year)	10	10	15	10
Exceeds Significance Threshold?	No	No	No	No
2025 Proposed Project Operational Emissions (lbs/day)[1]	19.69	8.48	13.20	3.78
BAAQMD Thresholds (lbs/day)	54	54	82	54
Exceeds Significance Threshold?	No	No	No	No

Notes:
[1] Assumes 365-day operation
NO_X = oxides of nitrogen
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
PM_{10} = particulate matter 10 microns or less in diameter
ROG = reactive organic gases
Source: CalEEMod output (see Appendix B).

Criterion 2

The 2017 Clean Air Plan contains 85 control measures that are aimed at reducing air pollution in the Bay Area. Along with the traditional stationary, area, mobile source, and transportation control measures, the 2017 Clean Air Plan contains a number of new control measures designed to protect the climate and promote mixed-use, compact development to reduce vehicle emissions and exposure to pollutants from stationary and mobile sources. Mitigation Measure AIR-1 (PBA EIR MM AQ-2) includes measures consistent with the 2017 Clean Air Plan, including implementation of construction best practices for diesel exhaust emissions and measure to reduce fugitive dust during construction. Therefore, construction of the proposed project would be consistent with Criterion 2 with Mitigation Measure AIR-1 (PBA EIR MM AQ-2) incorporated.

Operationally, the project site is currently served and would continue to be served by the ECR SamTrans bus route, with the closest stop located at El Camino Real and Center Street Millbrae, about120 feet from the project site. The proposed project is also located 0.5-mile of the SFO BART station and located 0.75 mile from the Millbrae BART/Caltrain station. In accordance with the General Plan, the proposed project would incorporate strategies and improvements that would commit to using transportation demand management strategies and actions decreasing the dependency on single-occupant automobiles and increasing transit use, ridesharing, and walking.

Relative to the energy and climate measures contained in the 2017 Clean Air Plan, the applicant would conform to the energy efficiency requirements of the California Building Standards Code, also known as Title 24. The Building Efficiency Standards were adopted, in part, to meet an Executive Order in the Green Building Initiative to improve the energy efficiency of nonresidential buildings through aggressive standards. Title 24 has been recently updated, including certain revisions to the energy usage components of the CALGREEN Code. The Title 24 standards are updated on an approximately 3-year cycle to allow consideration and possible incorporation of new energy-efficient technologies and methods. Energy-efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2019 Standards are 7 percent more efficient than 2016 Standards for residential construction; however,

once rooftop solar electricity generation is factored in, 2019 standards will use approximately 53 percent less energy than 2016 standards. Nonresidential buildings will use approximately 30 percent less energy. The proposed project would comply with the Title 24 CALGREEN requirements and incorporate building materials, fixtures, and landscaping that promote energy efficiency and water conservation. The proposed project would also comply with the City's Building Code and prep the proposed apartment complex for installation of rooftop solar panels.

Criterion 3

The proposed project would not preclude extension of a transit line or bike path, propose excessive parking beyond parking requirements, or otherwise create an impediment or disruption to implementation of any AQP control measures. Additionally, the project site would include perimeter paths that would allow residents and visitors to access San Mateo County transit stops adjacent to the site.

In summary, the proposed project would meet all of the energy and climate measures contained in the 2017 Clean Air Plan through project design features and implementation of Mitigation Measure AIR-1 (PBA EIR MMAQ-2).

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure AIR-1 (PBA EIR MM AQ-2: Construction Best Practices) is required.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact AIR-2: 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 Analysis

A cumulative impact analysis considers a project over time in conjunction with other past, present, and reasonably foreseeable future projects whose impacts might compound those of the project being assessed. Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants, including ozone and PM, is a result of past and present development, and thus, cumulative impacts related to these pollutants could be considered cumulatively significant. Future attainment of standards is a function of successful implementation of BAAQMD attainment plans. Consequently, BAAQMD's approach to cumulative thresholds of significance is relevant to whether a project's individual emissions would result in a cumulatively considerable contribution to the Bay Area's existing cumulative impacts related to air quality conditions. According to the BAAQMD CEQA Guidelines, if a project's emissions would be less than BAAQMD thresholds, the project would not be expected to result in a cumulatively considerable contribution to a significant cumulative impact. However, exceedance of the project-level thresholds would not necessarily constitute a significant cumulative impact.

As discussed above, the project construction and operation emissions would be less than the 2017 recommended BAAQMD thresholds. However, BAAQMD's CEQA Air Quality Guidelines consider dust impacts to be potentially significant. Therefore, the proposed project would implement BMPs to reduce these emissions as required by Mitigation Measure AIR-1 (PBA EIR MM AQ-2). In addition, the proposed project would be required to comply with all other applicable BAAQMD rules and regulations. As such, the proposed project's individual emissions would not be expected to result in a cumulatively considerable contribution to a significant cumulative impact with implementation of Mitigation Measure AIR-1 (PBA EIR MM AQ-2), and impacts would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure AIR-1 (PBA EIR MM AQ-2: Construction Best Practices) is required.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact AIR-3: Expose sensitive receptors to substantial pollutant concentrations?

Impact Analysis

With respect to human health, the primary pollutants of concern generated by the project would be criteria pollutants and TACs (asbestos and DPM). Each of these pollutants, as well as its potential impact on nearby receptors, is analyzed below.

Criteria Pollutants

Regional Emissions

Adverse health effects induced by regional criteria pollutant emissions (i.e., ozone precursors and particulate matter) generated by the proposed project would depend on numerous interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, the number and character of exposed individuals [e.g., age, gender]). For these reasons, ozone precursors (i.e., ROG and NOx) contribute to the formation of ground-borne ozone on a regional scale. Specifically, emissions of ROG and NOx generated in one area may not equate to an ozone concentration in that same area. Similarly, some types of particulate pollutants may be transported over long distances or formed through atmospheric reactions. As such, the magnitudes and locations of specific health effects from exposure to increased ozone or regional particulate matter concentrations are the product of emissions generated by numerous sources throughout a region, as opposed to a single individual project. Furthermore, a project's incremental contribution cannot be traced to specific health outcomes on a regional scale. Accordingly, a quantitative correlation of project-generated regional criteria pollutant emissions to specific human health impacts is not technically feasible for projects with relatively small contributions of emissions (i.e., emissions that would be below the regional air district thresholds).

Localized criteria pollutants generated by a project (e.g., fugitive dust) are deposited near the emissions source and have the potential to affect the population near that emissions source.

Although these pollutants dissipate with distance, emissions from individual projects can result in direct and material health impacts on adjacent sensitive receptors. As discussed above, the NAAQS and CAAQS are health protective standards that define the maximum amount of ambient pollution that can be present without harming public health.

BAAQMD has developed region-specific CEQA thresholds of significance for use in consideration of existing air quality concentrations and attainment designations under the NAAQS and CAAQS. The NAAQS and CAAQS are informed by a wide range of scientific evidence regarding safe concentrations of criteria pollutants. Recognizing that air quality is a cumulative problem, BAAQMD typically considers projects that generate criteria pollutants and ozone precursor emissions that are below the thresholds to be minor in nature. Such projects would not adversely affect air quality or exceed the NAAQS or CAAQS. As described under Impact AIR-2, neither construction nor operation of the proposed project would generate ROG, NO_X, or particulate matter exhaust in excess of BAAQMD's numeric thresholds. As such, the proposed project would not be expected to contribute a significant level of regional air pollution that would degrade regional air quality within the SFBAAB.

Localized Particulate Matter

Fugitive dust would be generated from site grading and other earth-moving activities. Most of this fugitive dust would remain localized and would be deposited near the project site. However, the potential for impacts from fugitive dust exists unless control measures are implemented to reduce the emissions from the project site. The proposed project would implement Mitigation Measure AIR-1 (PBA EIR MM AQ-2), requiring fugitive dust control measures that are consistent with BMPs established by the BAAQMD to reduce the proposed project's construction-generated fugitive dust impacts to a less-than-significant level.

Localized Carbon Monoxide

Localized concentrations of CO are related to the levels of traffic and congestion along streets and at intersections. Implementation of the proposed project would increase traffic volumes on streets near the project site; therefore, the proposed project would be expected to increase local CO concentrations. Concentrations of CO approaching the ambient air quality standards are only expected where background levels, traffic volumes, and congestion levels are high. BAAQMD's preliminary screening methodology for localized CO emissions provides a conservative indication of whether project-generated vehicle trips would result in the generation of CO emissions that contribute to an exceedance of the applicable threshold of significance. According to the BAAQMD CEQA Guidelines, the proposed project would result in a less-than-significant impact to localized CO concentrations if the following screening criteria are met:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, a regional transportation plan, and local congestion management agency plans.
- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

The proposed project would not conflict with the San Mateo County Congestion Management Program. The San Mateo City/County Association of Governments has developed level of service standards for roadways on the designated CMP network. As discussed in the Transportation Impact Analysis (TIA) prepared for the proposed project by Hexagon Transportation Consultants, Inc. (Appendix K) on December 11, 2019 (updated December 4, 2020), the proposed project would cause the intersection at El Camino Real and Millbrae to operate at an unacceptable level but this would not cause a significant impact because the increase in delay is less than the delay threshold for signalized intersections, and the unsignalized intersection volumes do not satisfy the California Department of Transportation (Caltrans) Peak hour Volume Signal Warrant for traffic signal installation.

Additionally, as provided in the TIA, the proposed project would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour. Areas where vertical and/or horizontal mixing is substantially limited include areas such as tunnels, parking garages, bridge underpasses, natural or urban street canyons, and below-grade roadways. The proposed project would not be affecting roadways in areas where vertical and/or horizontal mixing is substantially limited; the proposed project would not increase traffic volumes to more than 24,000 vehicles per hour in an area where vertical and/or horizontal mixing is substantially limited. Therefore, the proposed project would not be expected to result in the generation of localized CO emissions in excess of the applicable threshold of significance, and impacts would be less than significant.

Toxic Air Contaminants

Asbestos

Construction in areas of rock formations that contain NOA could release asbestos to the air and pose a health hazard. BAAQMD enforces CARB's air toxic control measures at sites that contain ultramafic rock. The air toxic control measures for construction, grading, quarrying and surface mining operations were signed into state law on July 22, 2002, and became effective in SFBAAB in November 2002. The purpose of this regulation is to reduce public exposure to NOA. A review of the map with areas more likely to have rock formations containing NOA in California indicates that there is no asbestos in the immediate project area (USGS 2011). Therefore, it can be reasonably concluded that the proposed project would not expose sensitive receptors to NOA. Likewise, the demolition of asbestos-containing materials (if found in existing structures) is subject to the limitations of the *National Emission Standards for Hazardous Air Pollutants* regulations and would require an asbestos inspection. Compliance with existing asbestos standards would prevent exposure of sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

Diesel Particulate Matter and PM2.5

Project impacts related to increased community risk would occur by introducing new sources of TAC emissions with the potential to adversely affect existing sensitive receptors in the project vicinity. The proposed project would introduce new sources of TACs during construction (e.g., onsite construction activity and truck hauling emissions) and operation (e.g., project traffic). Project construction activity would generate dust and equipment exhaust that would affect nearby sensitive receptors. Project operation would increase traffic in the area that would increase the air pollutant and TAC emissions in the area. However, the traffic generated would be mostly light-duty vehicles that are not a source of substantial TACs or $PM_{2.5}$. No stationary sources, like a diesel emergency

generator, are proposed for either land use. Project impacts o*n* existing sensitive receptors were addressed for temporary construction activities and long-term operational conditions. There are also several sources of existing TACs and localized air pollutants in the vicinity of the proposed project. The impact of the existing sources of TAC was also assessed in terms of the cumulative risk that includes the project contribution. Community risk impacts are addressed by predicting increased lifetime cancer risk, the increase in annual $PM_{2.5}$ concentrations and computing the Hazard Index (HI) for non-cancer health risks. The methodology for computing community risks impacts is contained in Appendix B.

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC. These exhaust air pollutant emissions would not be considered to contribute substantially to existing or projected air quality violations based on results shown in Tables 4.2-4 and 4.2-5. However, construction exhaust emissions may still pose health risks for sensitive receptors such as surrounding residents. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to $PM_{2.5}$. Diesel exhaust poses both a potential health and nuisance impact to nearby receptors. A health risk assessment of the project construction activities was conducted that evaluated potential health effects to nearby sensitive receptors from construction emissions of DPM and $PM_{2.5}$. This assessment included dispersion modeling to predict the off-site and onsite concentrations resulting from project construction so that lifetime cancer risks and non-cancer health effects could be evaluated.

Table 4.2-6 summarizes the maximum cancer risks, $PM_{2.5}$ concentrations, and health hazard indexes for the proposed project related construction activities affecting the nearby sensitive receptors to find the maximally exposed individuals (MEI). Attachment 3 of Appendix B includes the emission calculations used for the construction area source modeling and the cancer risk calculations. Results of this assessment, reported in Table 4.2-6, found that the construction MEI was located on the first floor (1.5 meters) of a single-family residence adjacent to the northern project boundary opposite Center Street. The maximum excess residential cancer risks at this location would exceed the BAAQMD significance thresholds of greater than 10 in one million, and the $PM_{2.5}$ concentrations would exceed the significance threshold of greater than 0.3 micrograms per cubic meter ($\mu g/m^3$) without any mitigation or prior to construction emission controls.

Table 4.2-6. Construction Risk Impacts at the Off-Site Residential MEI for the Proposed Project

Source	Cancer Risk (parts per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Construction			
Unmitigated	31.6 (infant)	0.37	0.02
Mitigated	3.8 (infant)	0.08	<0.01
BAAQMD Single-Source Threshold	>10.0	>0.3	>1.0
Exceeds Significance Threshold?			
Unmitigated	Yes	Yes	No
Mitigated	No	No	No

Notes:
$\mu g/m^3$ = micrograms per cubic meter
BAAQMD = Bay Area Air Quality Management District
$PM_{2.5}$ = particulate matter 2.5 microns or less

Implementation of construction best practices for dust, as required by Mitigation Measure AIR-1 (PBA EIR MM AQ-2) is consistent with the BAAQMD-recommended basic control measures for reducing fugitive particulate matter. In addition, implementation of Mitigation Measure AIR-1 (PBA EIR MM AQ-2) would require using construction equipment meeting Tier 4 Interim engine standards, which would reduce onsite diesel exhaust emissions from construction equipment. This would reduce the cancer risk and $PM_{2.5}$ concentrations such that the mitigated infant cancer risk from the proposed project at the construction MEI would be 3.8 parts per million for cancer risk, 0.08 $\mu g/m^3$ for $PM_{2.5}$, and <0.01 for HI. Therefore, after implementation of Mitigation Measure AIR-1 (PBA EIR MM AQ-2), the proposed project would have a less-than-significant impact with respect to community risk caused by construction activities.

Results of the project construction assessment indicated that the maximum cancer risks (without any mitigation or construction emission controls) would be 8.7 parts per million for child exposure at the Millbrae Nursery School. The maximum modeled annual $PM_{2.5}$ concentration, which is based on combined exhausted and fugitive dust emissions, would be 0.27 $\mu g/m^3$, and the maximum computed HI based on the DPM concentration would be 0.01. These risk values do not exceed the BAAQMD single-source significance threshold for annual cancer risk, $PM_{2.5}$ concentrations, or HI. Mitigation required for the MEI would further reduce the impact to the Nursery School.

Community health risk assessments typically look at all substantial sources of TACs located within 1,000 feet of project sites and at new TAC sources that would be introduced by the project. These sources include rail lines, highways, busy surface streets, and stationary sources identified by BAAQMD. A review of the surrounding area indicates that Caltrain has a rail line that passes through the project influence area, and that traffic on El Camino Real (Highway 82) has average daily traffic (ADT) that exceeds 10,000 vehicles per day. All other nearby streets are assumed to have an ADT that is less than 10,000 vehicles per day. Eight cumulative sources were identified within the 1,000-foot influence area using the BAAQMD's stationary source Google Earth tool and GIS website. Table 4.2-7 shows the results of the six stationary sources, roadway traffic along El Camino Real, and the Caltrain Rail Line. In addition to showing the cumulative risks of different sources, the table also outlines BAAQMD's cumulative threshold and shows that the cumulative risks are below threshold; therefore, impacts would be less than significant.

Table 4.2-7. Impacts from Combined Sources at Off-Site Residential MEI

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Ambient Sources			
Caltrain Rail Line	6.0	0.01	-
El Camino Real (Highway 82), MEI at 330-feet east, ADT 31,545	4.6	0.15	<0.03
City of Millbrae (Plant #20169, Generator), MEI at 300 meters	0.1	<0.01	<0.01
San Francisco Water Department (Plant #106250, Gas Station) MEI at 310 meters	<0.1	-	<0.01
SFPUC- Water Supply and Treatment (Plant #14241, Generator), MEI at 250 meters	<0.1	<0.01	<0.01

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
San Francisco Water Department (Plant #24451, 2 Generators), MEI at 380 meters	1.1	<0.01	0.13
Version Wireless (Plant #19561, Generator), MEI at 285 meters	0.3	<0.01	<0.01
Olympic (Plant #102970, Gas Station), MEI at 285 meters	<0.1	-	<0.01
Total	**12.4**	**0.20**	**<0.20**
Project Contribution (Table 4.6-6)			
Unmitigated	31.6 (infant)	0.37	0.02
Mitigated	3.8 (infant)	0.08	<0.01
Cumulative Total			
Unmitigated	44.0	0.57	<0.23
Mitigated	16.2	0.28	<0.23
BAAQMD Cumulative Source Threshold	100	0.8	10.0
Exceeds Significance Threshold?			
Unmitigated	No	No	No
Mitigated	No	No	No

Notes:
$\mu g/m^3$ = micrograms per cubic meter
ADT = average daily traffic
BAAQMD = Bay Area Air Quality Management District
MEI = maximally exposed individual
$PM_{2.5}$ = particulate matter 2.5 microns or less
SFPUC = San Francisco Public Utilities Commission

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure AIR-1 (PBA EIR MM AQ-2: Construction Best Practices) is required.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact AIR-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact Analysis

Odors are generally regarded as an annoyance rather than a health hazard. Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, quantitative methodologies to determine the presence of a significant odor impact do not exist. According to CARB's Air Quality and Land Use Handbook, some of the most common sources of odor complaints received by local air districts are sewage treatment plants, landfills, recycling facilities, waste transfer stations, petroleum refineries, biomass

operations, auto body shops, coating operations, fiberglass manufacturing, foundries, rendering plants, and livestock operations. The project site is not located near any such land uses, and the proposed project would not introduce any such land uses. BAAQMD provides odor screening distances in Table 3-3 of its CEQA Guidelines (BAAQMD 2017). The project site is not located within any of the odor screening distances recommended by BAAQMD.

Residential, commercial, and office land uses are not typically associated with the creation of substantial objectionable odors. Diesel fumes from construction equipment are often found to be objectionable; however, construction is temporary, and associated diesel emissions would be regulated per federal, state, and local regulations, including compliance with all applicable BAAQMD rules and regulations, which would help to control construction-related odorous emissions. Therefore, construction of the proposed project would not be expected to create objectionable odors affecting a substantial number of people.

For the aforementioned reasons, construction and operation of the proposed project would not create objectionable odors, nor would the project site be affected by any existing sources of substantial objectionable odors, and a less-than-significant impact related to objectionable odors would result.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

4.3 Biological Resources

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species 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 or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (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?	☐	☐	☐	☒

4.3.1 Environmental Setting

A desktop analysis, based on a review of existing information about sensitive biological resources known to occur near the project site, was conducted to determine whether biological resources are absent, present, or are likely to be present. For the purpose of this evaluation, special-status plant species include plants that are listed or designated as follows: 1) listed as threatened or endangered under the California Endangered Species Act (CESA) or Federal Endangered Species Act (FESA); 2) proposed for federal listing as threatened or endangered; 3) listed as state or federal candidate species; 4) designated as rare by the California Department of Fish and Wildlife (CDFW); or 5) designated as California Rare Plant Rank 1A, 1B, 2A or 2B species. Special-status animal species include species that are listed or designated as follows: 1) listed as threatened or endangered under CESA or FESA; 2) proposed for federal listing as threatened or endangered; 3) listed as state or federal candidate species; or 4) identified by CDFW as species of special concern or fully protected species.

Sensitive natural communities are those communities that are highly limited in distribution and may or may not contain rare, threatened, or endangered species. The California Natural Diversity Database (CNDDB) ranks natural communities according to their rarity and endangerment in California. Habitats are considered sensitive if they are identified on the CDFW List of Vegetation Alliances and Associations as being highly imperiled or classified by CDFW in the CNDDB as natural communities of special concern – Ranks S1 to S3.

Other information sources consulted to determine which special-status species could potentially occur in the project site included the following:

- USGS California 7.5-minute topographic quadrangles for Montara Mountain, San Francisco South, Hunter's Point and San Mateo
- Aerial photographs of the project site and surrounding vicinity (Google Earth 2020)
- United States Fish and Wildlife Service (USFWS) list of endangered and threatened species that may occur in the project site (USFWS 2020a)
- USFWS Designated Critical Habitat (USFWS 2020a)
- USFWS National Wetlands Inventory (USFWS 2020b)
- The CDFW CNDDB plant and animal records within 5 miles of the project site (CDFW 2020a)
- Special Animals List (CDFW 2020b)
- California Native Plant Society (CNPS) online Inventory of Rare and Endangered Plants (CNPS 2020)
- California Wildlife Habitat Relationships System (CDFW 2014)

Based on this review of existing information, a list of special-status species that have the potential to occur or are known to occur in the project site and vicinity was developed (Appendix C). The list was refined based on the habitat within and adjacent to the project site to determine the potential for those species to occur.

4.3.1.1 Habitat Communities

Habitat types within the project site were classified based on descriptions provided in *A Guide to Wildlife Habitats of California* (Mayer and Laudenslayer 1988), as well as the California Natural Community List (CDFW 2020c), which is adapted from the technical approach and vegetation alliance classification system described in *A Manual of California Vegetation* (Sawyer et al. 2009). The habitat community present in the project site is Urban. The project site is completely developed with the El Rancho Inn and two residential buildings that are surrounded by surface parking. Minimal landscaped areas occur throughout the project site and include ornamental trees and shrubs planted adjacent to buildings, parking spots, and walkways. A small ornamental grass lawn occurs along the northeastern boundary of the project site. No aquatic resources were identified within or adjacent to the project site.

4.3.1.2 Special-Status Species

Plants

A total of 66 special-status plant species were identified based on a review of pertinent literature, the USFWS species list and CNDDB and CNPS database records. CNDDB special-status plant species occurrences were reviewed within 5 miles of the project site. For each species, habitat requirements were assessed and compared to the habitats in the project site and immediate vicinity to determine if potential habitat occurs in the project site. The project site does not provide suitable habitat for special-status plants due to the existing development.

Wildlife

A total of 35 special-status animal species were identified based on a review of pertinent literature, the USFWS species list, CNDDB database records, and a query of the California Wildlife Habitat Relationship System (CDFW 2014). CNNDB special-status animal species occurrences were reviewed within 5 miles of the project site. For each species, habitat requirements were assessed and compared to the habitats in the project site and the immediate vicinity to determine the species' potential to occur in or near the project site. The project site does not provide suitable habitat for special-status species due to the existing development.

4.3.1.3 Critical Habitat

The project site is not within USFWS-designated critical habitat. There is critical habitat within the vicinity of the project site, including California red-legged frog critical habitat located 1.5 miles southwest and Bay checkerspot butterfly critical habitat located 4 miles north of the project site. There is no suitable habitat present on the project site for either of these species.

4.3.2 Previous Environmental Analysis

4.3.2.1 City of Millbrae General Plan EIR Summary

Chapter 4.12 of the General Plan EIR discusses impacts on biological resources. According to the General Plan EIR, future development would impact existing wildlife habitat with new structures and landscaping; however, General Plan policies would improve habitat available to wildlife, making the impact less than significant. Numerous trees could be affected by improvements associated with the General Plan, but tree replacement plantings would be provided during future landscaping; therefore, the General Plan would not conflict with the City's Tree Protection and Urban Forestry Program. The General Plan indicates jurisdictional wetlands and suitable habitat for special-status species is restricted to the Millbrae Avenue interchange and marshy vacant lands east of Highway 101, referred to as the airport lands. No modification or development within the airport lands is proposed as part of the General Plan; therefore, adherence to General Plan policies would ensure potential impacts to special-status species would be less than significant (City of Millbrae 1998b).

The following General Plan policies would be applicable to the proposed project:

Policy PC4.2: **Development Review Process.** Maximize open space preservation opportunities in the private development review process and other approaches that minimize on-going City costs and liability exposure and still achieve City open space goals.

Policy PC4.5: **Trees and Landscaping.** Protect existing trees and encourage drought-tolerant landscaping, including new tree plantings, in private and public areas, including street medians. Utilize the design review process to review landscaping plans and enforce tree and landscape goals, consistent with the preservation of views.

Policy PC6.1: **Habitat Protection.** Preserve important plant and wildlife habitats, including chaparral, broadleaf /riparian woodlands, open grasslands, marshy areas, creeks, and sensitive nesting sites. Loss of these habitats should be fully offset through creation of habitat of equal value, with the compensation rate for habitat recreation determined by a qualified biologist.

Policy PC6.2: **Rare and Endangered Species.** Limit development in areas which support the San Francisco garter snake, red-legged frog, and other rare or endangered species. If development of these areas must occur, any loss of habitat should be fully compensated onsite. If off-site mitigation is necessary, it should occur within the Millbrae planning area whenever possible and must be accompanied by plans and a monitoring program prepared by a qualified biologist.

4.3.2.2 Plan Bay Area EIR Summary

The following summarizes the potential impacts on biological resources discussed in Chapter 3.5 of the Plan Bay Area EIR and includes the complete text of mitigation measures previously identified by the Plan Bay Area EIR that are applicable to the proposed project.

Impact BIO-1a: Special-Status Species. The Plan Bay Area EIR analyzed the potential impact related to species identified as candidate, sensitive, or special-status in local or regional plans, policies, or regulations, or by CDFW or USFWS, and determined that, with the implementation of Plan Bay Area EIR Mitigation Measure BIO-1(a), the impact would be less than significant. Mitigation Measure BIO-1(a) does not apply to the proposed project because there is no potential habitat within the project site for special-status plant species with occurrences within a 5-mile radius, no special-status species have a moderate or high potential to occur within the project site, and the project site does not provide suitable nesting habitat for special-status birds or raptors. Landscaped areas and ornamental trees within the project site could provide suitable nesting habitat for other migratory birds protected under the Migratory Bird Treaty Act or California Fish and Game Code. As such, project-specific mitigation has been identified to further avoid disturbance of migratory birds (refer to Impact BIO-1 in Section 4.3.3, Project-Specific Analysis).

Impact BIO-1b: Designated Critical Habitat. The Plan Bay Area EIR analyzed the potential impact related to designated critical habitat for federally listed plant and wildlife species and determined that, with the implementation of Mitigation Measure BIO-1(b), the impact would be less than significant. Mitigation Measure BIO-1(b) is not applicable to the proposed project because there is no critical habitat in the project area (refer to Impact BIO-2 in Section 4.3.3, Project-Specific Analysis).

Impact BIO-2: Riparian Habitat, Federally Protected Wetlands, or Other Sensitive Natural Communities. As discussed in the Plan Bay Area EIR, projects would have the potential to affect jurisdictional waters and other sensitive habitats, resulting in a potentially significant impact. The Plan Bay Area EIR identifies Mitigation Measure BIO-2 to reduce impacts to jurisdictional waters to a less-than-significant level. Mitigation Measure BIO-2 is not applicable to the proposed project as it

is a fully developed site and does not contain riparian habitat, protected wetlands, or other sensitive natural communities (refer to Impact BIO-3 in Section 4.3.3, Project-Specific Analysis).

Impact BIO-3: Movement of Native Resident or Migratory Fish or Wildlife Species, Wildlife Corridors, and Nursery Sites. The Plan Bay Area EIR analyzed the potential impact related to substantially interfering with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridor, or related to impeding the use of native wildlife nursery sites, and determined that, with the implementation of Mitigation Measure BIO-3(a) and BIO-3(b), the impact would be less than significant. Mitigation Measure 2.9-3 is not applicable to the proposed project because there are no wildlife corridors on the project site (refer to Impact BIO-4 in Section 4.3.3, Project-Specific Analysis).

Impact BIO-4: Local Conservation Policies, Ordinances, and Plans. As discussed in the Plan Bay Area EIR, development projects would be required to follow city and county development requirements, including compliance with local policies, ordinances, and applicable permitting procedures related to protection of biological resources. Additionally, consistency with an adopted HCP or other conservation plan is a legal requirement, and the design, approval, and permitting of future development and transportation projects within an area covered by an HCP or other conservation plan would be expected to comply with that requirement. Therefore, the Plan Bay Area EIR determined that the potential for approved development projects to conflict with local policies or ordinances protecting biological resources would be less than significant, and no mitigation measures were identified.

Impact BIO-5: Habitat for Fish and Wildlife Species. The Plan Bay Area EIR analyzed the potential impact related to habitat for fish and wildlife species and determined that, with the implementation of Plan Bay Area EIR Mitigation Measures BIO-1(a), BIO-1(b), BIO-2, and BIO-3(a), the impact would be less than significant. Mitigation Measures BIO-1(a), BIO-1(b), BIO-2, and BIO-3(a) do not apply to the proposed project because there is no potential habitat within the project site for fish and wildlife species, no critical habitat, and no wildlife corridors on or near the project site.

4.3.3 Project-Specific Analysis

Impact BIO-1: 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 Game or U.S. Fish and Wildlife Service?

Impact Analysis

Special-Status Plant Species

There is no potential habitat within the project site for special-status plant species to occur. The project site is completely developed, and landscaped areas are frequently disturbed by maintenance activities such as mowing and trimming. Based on the lack of suitable habitat, the project site does not provide potential habitat for special-status plant species to occur, and there would be no impacts to special-status plants.

Special-Status Wildlife Species

Although there are CNDDB occurrence records within 5 miles of the project site for special-status animal species (CDFW 2020a), the project site does not provide suitable habitat (e.g., aquatic features or annual grassland) for potential special-status animal species to occur. Due to the project site having landscaped areas and ornamental trees, the site provides potential foraging and nesting habitat for migratory birds under the Migratory Bird Treaty Act or California Fish and Game Code (FGC). The project site also provides potential roosting habitat for bats (tall trees along the northwestern boundary of the project site) protected under FGC Section 4150.

If proposed project activities occur during the nesting bird season (generally considered to be from February 1 to August 31), construction may cause direct effects (e.g., tree removal and vegetation clearing) and indirect effects to nesting birds (e.g., noise and vibration) by causing adults to abandon active nests, resulting in nest failure and reduced reproductive success. Mitigation Measure BIO-1 would require preconstruction nesting bird surveys to document all nests on the project site and implement protective buffers around documented nests during construction to minimize disturbance to nesting birds during construction. Based on potential suitable nesting habitat in the project site, there is moderate potential for migratory nesting bird species to occur; however, with the implementation of Mitigation Measure BIO-1, impacts to migratory nesting bird species would be less than significant.

Construction may cause direct and indirect effects to roosting bats as well, including mortality or injury to bats if they are present in trees at the time of removal or trimming. Mitigation Measure BIO-2 would require conducting preconstruction roosting bat surveys to document all potential roosting features and presence of guano, along with establishing protective buffers around documented roosting sites within the project site. Based on potential suitable roosting habitat in the project site, there is moderate potential for roosting bat species to occur; however, with the implementation of Mitigation Measure BIO-2, impacts on roosting bat species would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

MM BIO-1: **Avoid Disturbance of Nesting Birds.** Vegetation removal and initial ground-disturbance activities should be initiated during the non-nesting season for migratory birds from September 1 to January 31. If work cannot be initiated during this period, a nesting bird survey should be performed by a qualified biologist for species protected by the Migratory Bird Treaty Act and California Fish and Game Code within a 250-foot radius of proposed construction activities for passerines, no more than 2 weeks prior to the start of construction activities. If active nests are found, a no-disturbance buffer should be placed around the nest until young have fledged or the nest is determined to be no longer active by the qualified biologist. The size of the buffer shall be determined by the biologist based on species and proximity to activities and may be reduced at the discretion of the qualified biologist. Active nests shall be monitored periodically to determine time of fledging.

MM BIO-2: **Avoid Disturbance of Roosting Bats.** Prior to construction and tree-removal activities, a qualified biologist shall conduct preconstruction surveys for roosting bats within 2

weeks of starting work. Tree removal and construction activities shall be conducted during specific seasonal periods of bat activity: between August 31 and October 15, when bats would be able to fly and feed independently, and between March 1 and April 1 to avoid hibernating bats and prior to the formation of maternity colonies. If the qualified biologist finds evidence of bat presence during the surveys, then a plan for removal and exclusion shall be prepared in conjunction with CDFW.

If construction activities and tree removal must occur outside of the seasonal activity periods (e.g., between October 16 and February 28–29, or between April 2 and August 30), then a qualified biologist shall conduct preconstruction surveys within 2 weeks of starting work. If roosts are found, a determination shall be made whether there are young. If a maternity site is found, impacts on the maternity site shall be avoided by establishment of a non-disturbance buffer until the young have reached independence. The size of the buffer zone shall be determined by the qualified biologist at the time of the surveys. If the qualified biologist finds evidence of bat presence during the surveys, then a plan for removal and exclusion when there are not dependent young present shall be prepared in conjunction with CDFW.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact BIO-2: 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 Game or U.S. Fish and Wildlife Service?

Impact Analysis

The project site does not contain any sensitive natural communities as classified by the CDFW. In addition, no aquatic habitats were identified within the project site that could be considered waters of the United States and subject to the U.S. Army Corps of Engineers and RWQCB jurisdiction under Sections 404 and 401 of the Clean Water Act, or subject to CDFW jurisdiction under Section 1600 of the California FGC. Therefore, the proposed project would have no impact on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

Impact BIO-3: 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 Analysis

No aquatic resources or potential wetlands covered under the jurisdiction of the U.S. Army Corps of Engineers or RWQCB occur within the project site. As such, there would be no impact to state or federally protected wetlands.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

Impact BIO-4: 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 wildlife nursery sites?

Impact Analysis

Habitat corridors are segments of land that provide linkages between different habitats while also providing cover. On a broader level, corridors also function as avenues along which wide-ranging animals can travel, plants can propagate, genetic interchange can occur, populations can move in response to environmental changes and natural disasters, and threatened species can be replenished from other areas. Habitat corridors often consist of riparian areas along streams, rivers, or other natural features. Habitat corridors have been recognized by federal agencies, such as the USFWS, and the state as important habitats worthy of conservation. In general, movement corridors consist of areas of undisturbed land cover that connect larger, contiguous habitats. The project site does not act as a corridor for species dispersal or provide migration habitat connectivity to adjacent habitat and is not part of any defined essential connectivity areas as identified in the California Essential Habitat Connectivity Project (Spencer et al. 2010); therefore, the proposed project would have no impact.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

Impact BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact Analysis

A tree survey was conducted for the proposed project on May 17, 2017 and August 12, 2020 (Appendix D). The surveys included all trees located within or immediately adjacent to the project site, specifically along El Camino Real and the northeast project limits. A total of 74 trees were counted consisting of 15 native and non-native species. A total of 55 trees, including 35 protected trees as defined by Section 9.45.040 of the Millbrae Municipal Code, would be directly affected by the proposed project and would require removal during the demolition phase. The proposed project would comply with the City's Tree Protection and Urban Forestry Program, Chapter 8.60 of the Millbrae Municipal Code, and obtain a tree removal permit prior to removing any street trees. The City's Municipal Code does not specify a recommended tree replacement or mitigation ratio for trees removed on private property. Section 8.60.070(c) of the Millbrae Municipal Code specifically requires that, "if a permit is issued for removal, the director will attach as a condition the applicant's replacement of the street tree and designate on the permit the type of tree, as may be recommended by the applicant from the master tree plan" (Millbrae Municipal Code Section 8.60.070[c]). Further, Section 9.45.290 of the City's Municipal Code states that protected trees should be preserved where possible, however does not give further specifications if preservation of protected trees is not feasible. Therefore, although the proposed project would involve removal of 55 trees, including 35 protected trees, an additional 315 trees would be added to the project site, including 12 Live Oak trees along Center Street, which would more than offset the removal. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, including tree preservation policies or ordinances. The impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact BIO-6: 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 Analysis

The project site is not within any boundary of an HCP; NCCP; or other approved local, regional, or state HCPs. As such, there would be no impact with respect to conflicting with provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCPs.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

4.4 Cultural Resources

	Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c)	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

4.4.1 Environmental Setting

This section provides an overview of the history of the City and of resources of historical significance that may be affected by the proposed project. Studies indicate that San Mateo County has likely been continually inhabited since between 3500 and 2500 B.C., first by the Ohlone/Costanoan groups of Native American peoples and more recently by the people of Spain, Mexico, and United States.

Native American Period

The Ohlone previously occupied the coastline in the San Francisco Bay Area with territory stretching from San Francisco to Monterey Bay. In San Mateo County, the Ohlone concentrated near inland village sites, such as those located on the Colma and San Bruno Creeks, as well as seasonal villages on the shore of San Francisco Bay. The Ohlone were known to hunt deer, rabbits, fish, wild geese, and ducks in addition to gathering food such as nuts, roots, berries, and shellfish such as mussels and clams. Most of the fishing was done on the inland bay areas, while the coast provided access to important mollusks, such as abalone and mussels, as well as stranded whales and sea lions (Levy 1978).

Spanish Period

Considered the first Europeans to reach the San Francisco Bay Area, Spanish explorers led by Gaspar de Portola traversed the San Mateo coastline in 1769 looking for potential settlement locations. In order to avoid swampy ground near the coast, the explorers camped at inland locations, including along San Andreas Creek near the present-day City of Millbrae (Brown et al. 2003). A second expedition led by Captain Fernando Rivera in 1774 followed the modern route of the El Camino Real, and in 1776, an expedition led by Juan Bautista de Anza established the Mission of San Francisco de Asis (Mission Dolores) in present-day San Francisco. The El Camino Real, which runs through the City, would become the primary route between Mission Dolores and other missions farther to the south.

Mexican Period

Under Mexican rule from 1822 to 1848, former mission lands were redistributed as land grants to individuals, including cattle ranchers and hide and tallow traders. The City was part of three land grants, including “Rancho Buri,” which encompasses the project area. While Rancho Buri was one of

the largest grants on the Peninsula, peninsular land grants were generally smaller than those in other parts of California. Nonetheless, cattle ranching had already begun to flourish in the area of the Rancho as early as 1810 when ranching was established on the Peninsula to support the growing populations of the Spanish missions (Brown et al. 2003).

American Period

After Mexico was forced to cede California to the United States at the end of the Mexican-American War, the heirs of the original landowner filed suit to retain the Rancho as required by the 1848 Treaty of Guadalupe Hidalgo. Their ownership of the land was upheld, but under pressure from the resulting legal fees and high taxes, the family was forced to sell the portion of the Rancho that would become Millbrae to Darius Ogden Mills in the 1860s. Mills built a large residence soon after and named his estate Millbrae as a nod to his Scottish heritage.

The small towns that had initially formed as outposts along the El Camino Real as the main road connecting the missions at San Francisco and San Jose became havens for San Francisco residents fleeing the effects of the 1906 earthquake. The wartime economic booms experienced throughout the region during the First and Second World Wars created jobs that continued to attract new residents in the subsequent decades. Population density continued to rise after the completion of the Interstate Highway system, leading to the dense suburban and commercial development that characterizes the City at the present time.

4.4.1.1 Historical Resources

The project site is currently developed with the El Rancho Inn and two residential buildings. In September 2020, a DPR 523 form set was completed for the El Rancho Inn (Assessor Parcel Number 021-324-320) on the project site to determine its eligibility for the CRHR (Cruiess 2020, Appendix E). The San Mateo County Assessor records show that the motel was constructed in 1949. According to the analysis in the DPR 523 form set, the motel does not possess significance under any CRHR criteria. While integrity is defined as those features of a property that convey its historic significance, the integrity of the El Rancho Inn was nevertheless evaluated, despite its lacking significance. The El Rancho Inn does not retain integrity of design, materials, or workmanship due to the remodeling and alterations that have taken place, removing most of the original Mission Revival features and the original layout of the motel. The construction of the later buildings, including the Health Club, Buildings 200, 300, 500, 600, and 700, as well as the Terrace Café and Restaurant, altered the integrity of setting, feeling, and association. The El Rancho Inn does not retain significance and is not eligible for listing in the CRHR or NRHP.

The two residential buildings located on the project site are older than 45 years (Assessor Parcel Number 021-324-190; 33 and 35 Center Street). The residential building at 33 Center Street, is a two-story multi-family residential building with an L-shaped plan. According to the analysis in the DPR 523 form set, the property does not possess significance under any CRHR criteria (Felicetti 2021a, Appendix E). The building at 35 Center Street is a two-story single-family residential building with a rectangular plan. According to the analysis in the DPR 523 form set, the property does not possess significance under any CRHR criteria (Felicetti 2021b, Appendix E).

Archaeological Resources

According to the General Plan EIR, prehistoric cultural resources in San Mateo County tend to be situated near the historic shoreline and marshes of the San Francisco Bay. While the current project

location is near the shoreline, it is within early to late Pleistocene undifferentiated Alluvial deposits (Witter et al 2006) and is not mapped as archaeologically sensitive by a Caltrans District 4 buried site sensitivity analysis (Mayer et al 2007). The General Plan EIR does not identify any specific archaeological resources; however, there is one (1) precontact midden site 0.25-mile north from the project site and a small midden site 0.3 mile to the southwest. Numerous studies have been conducted in and around the City consisting of a mixture of architectural and archaeological surveys. As a result of the studies, several historic-period and prehistoric archaeological resources have been identified throughout the area. These studies are generally located in the northern part of San Mateo County in close proximity to sources of water, wetlands, coastal terraces, and sheltered valleys. While the proposed project is located near the historic shore of the San Francisco Bay, a review of historic maps including the 1865 GLO map,1915, 1939, and 1946 USGS topographic maps indicates that no structures were present on this parcel until after 1939, with one small unidentified structure present in 1949. The Southern Pacific Railroad has been present since at least 1896, and disturbances associated with the construction of the railroad, streets, and residential and commercial structures have heavily affected the project site. By 1956, the parcel was as fully developed as it is today. No archaeological surveys were conducted due to the paved nature of the project site.

Furthermore, a review of a recorded resources listed in the California Historical Resources Information System database of recorded archaeological sites and studies and a general landform analysis of existing waterways and known archaeological resources indicate that the project site is not sensitive for archaeological resources. Lastly, a Native American Sacred Lands File search and outreach done by the City of Millbrae on November 15, 2017, was negative. In addition, the City conducted tribal consultation pursuant to AB 52. Tribal consultation letters were sent on December 14. 2021 and January 3, 2022 to the tribal contact address list provided by the Native American Heritage Commission (NAHC). As of the release of the Draft-SCEA, the City has not received any response from the tribal representatives. .

4.4.2 Previous Environmental Analysis

City of Millbrae General Plan EIR Summary

Chapter 4.14 of the General Plan EIR discusses potential impacts on prehistoric and historic resources. According to the General Plan EIR, due to the historic presence of the shoreline and marshes of the Bay, the City has a high potential for identifying cultural resources (City of Millbrae 1998b). Since most of the land in the City is reclaimed, these remains may be covered by a few inches to several feet of non-native fill. The General Plan EIR identifies this as a potentially significant impact. The General Plan EIR identifies Mitigation Measure 4.14-1, which would have the City include a policy in the General Plan to require further archival and field study by an archaeologist prior to major development or redevelopment projects (City of Millbrae 1998b).

The following General Plan policies are applicable to the proposed project:

Policy PC6: **Protect and Conserve Natural Resources.** Preserve natural resources which would provide important habitat, ecological, or archeological value, and maintain clean air and water quality.

4.4.2.1 Plan Bay Area EIR Summary

The following summarizes the potential impacts to cultural resources discussed in Chapter 3.7 of the Plan Bay Area EIR and includes the complete text of mitigation measures previously identified by the Plan Bay Area EIR that are applicable to the proposed project.

Impact CUL/TCR-1: Historical Resources. The Plan Bay Area EIR analyzed the potential impact related to a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 and determined that even with the implementation of the Plan Bay Area EIR Mitigation Measure CUL/TCR-1, the impact would be significant and unavoidable with mitigation. A historic resources evaluation was conducted for the proposed project, which resulted in no historical resources in the study area, and therefore, a finding of no impact. Therefore, Plan Bay Area EIR Mitigation Measure CUL/TCR-1 is not applicable to the proposed project (refer to Impact CUL-1 in Section 4.4.3, Project-Specific Analysis).

Impact CUL/TCR-2: Archaeological Resources. The Plan Bay Area EIR analyzed the potential impact related to a substantial adverse change in the significance of a unique archaeological resource as defined in Section 15064.5 and determined that, even with the implementation of Mitigation Measure CUL/TCR-2, the impact would be significant and unavoidable (refer to Impact CUL-2 in Section 4.4.3, Project-Specific Analysis).

PBA EIR MM CUL/TCR-2: Implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

- Before construction activities, project sponsors shall retain a qualified archaeologist to conduct a record search at the appropriate information center to determine whether the project area has been previously surveyed and whether resources were identified; the record search shall include contacting NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information. If a survey of the project site has not been conducted in the last 5 years, project sponsors shall retain a qualified archaeologist to conduct archaeological surveys prior to construction activities. Project sponsors shall follow recommendations identified in the survey, which may include activities such as subsurface testing, designing and implementing a Worker Environmental Awareness Program, construction monitoring by a qualified archaeologist, avoidance of sites, or preservation in place.
- Areas determined to be of cultural significance shall be monitored during the grading, excavation, trenching, and removal of existing features by a qualified archeologist and culturally affiliated California Native American tribal monitor.
- To ensure that new transportation facilities, such as the Transbay rail crossing, do not adversely affect potentially buried archaeological deposits, an underwater archaeological survey shall be conducted to identify, evaluate, and protect significant submerged cultural resources prior to activities that would disturb the shoreline or the floor of the bay. Additionally, the archaeologist shall request a search of the California State Lands Commission Shipwreck Database.
- When a project would affect a known archaeological site, the project sponsor and/or implementing agency shall determine whether the site is a historical resource (CEQA Guidelines Section 15064.5(c)(1)). If archaeological resources identified in the project area

are considered potentially significant, the project sponsor and/or responsible implementing agency shall undertake additional studies overseen by a qualified archaeologist (36 CFR Section 61) to evaluate the resources' eligibility for listing in the CRHR, NRHP, or local register and to recommend further mitigative treatment. Evaluations shall be based on, but not limited to, surface remains, subsurface testing, or archival and ethnographic resources, on the framework of the historic context and important research questions of the project site, and on the integrity of the resource. If a site to be tested is prehistoric, culturally affiliated California Native American tribal representatives shall be afforded the opportunity to monitor the ground-disturbing activities. Appropriate mitigation may include curation of artifacts removed during subsurface testing.

- If prehistoric archeological resources are identified through survey or discovered in the project site, the culturally affiliated California Native American tribe shall be notified. Both the archeologist and tribal monitor or tribal representative should strive for agreement on the determined significance of an artifact or cultural resource.
- If significant archaeological resources that meet the definition of historical or unique archaeological resources are identified in the project site, the preferred mitigation of impacts is preservation in place (CEQA Guidelines Section 15126.4(b); PRC Section 21083.2). Preservation in place may be accomplished by, but is not limited to, avoidance by project design, incorporation within parks, open space or conservation easements, covering with a layer of sterile soil, or similar measures. If preservation in place is feasible, mitigation is complete. Additionally, where the implementing agency determines that an alternative mitigation method is superior to in-place preservation, the project sponsor and/or implementing agency may implement such alternative measures.
- When preservation in place or avoidance of historical or unique archaeological resources are infeasible, data recovery through excavation shall be required (CEQA Guidelines Section 15126.4(b)). Data recovery would consist of approval of a Data Recovery Plan and archaeological excavation of an adequate sample of site contents so that research questions applicable to the site can be addressed. For prehistoric sites, the culturally affiliated California Native American tribe shall be afforded the opportunity to monitor the ground-disturbing activities. If only part of a site would be affected by a project, data recovery shall only be necessary for that portion of the site. Data recovery shall not be required if the implementing agency determines prior testing and studies have adequately recovered the scientifically consequential information from the resources. Confidential studies and reports resulting from the data recovery shall be deposited with the Northwest Information Center. Mitigation may include curation for artifacts removed during data recovery excavation.
- If archaeological resources are discovered during construction, all work near the find shall be halted and the project sponsor and/or implementing agency shall follow the steps described under CEQA Guidelines Section 15064.5(f), including an immediate evaluation of the find by a qualified archaeologist (36 CFR Part 61) and implementation of avoidance measures or appropriate mitigation if the find is determined to be a historical resource or unique archaeological resource. If the find is a prehistoric archaeological site, the culturally affiliated California Native American tribe shall be notified and afforded the opportunity to monitor mitigative treatment. During evaluation or mitigative treatment, ground disturbance and construction work could continue on other parts of the project site.

- Integrate curation of all historical resources or a unique archaeological resources and associated records in a regional center focused on the care, management, and use of archaeological collections. All Native American human remains and associated grave goods discovered shall be returned to their Most Likely Descendent and repatriated. The final disposition of artifacts not directly associated with Native American graves shall be negotiated during consultation with the culturally affiliated California Native American tribes. Artifacts include material recovered from all phases of work, including the initial survey, testing, indexing, data recovery, and monitoring. Curated materials shall be maintained with respect for cultures and available to future generations for research.
- Project sponsors shall comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect archaeological resources.

Impact CUL/TCR-3: Disturb Human Remains. The Plan Bay Area EIR analyzed the potential impacts related to the disturbance of human remains, including those interred outside of formal cemeteries, and determined that impacts would be less than significant as projects are required to comply with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097. Compliance with these state regulations provides an opportunity to avoid or minimize the disturbance of human remains and appropriately treat any remains that are discovered. Therefore, impacts to human remains would be less than significant, and no mitigation measures were identified.

4.4.3 Project-Specific Analysis

Impact CUL-1: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Impact Analysis

As discussed in Section 4.4.1, Environmental Setting, the DPR 523 form set for the El Rancho Inn, 33 Center Street, and 35 Center Street show that there are no resources eligible for listing in the CRHR or NRHP (Cruiess 2020, Felicetti 2021a, Felicetti 2021b, in Appendix E). Therefore, there are no historical resources for the purposes of CEQA. No other potential historical resources (those likely potentially eligible under state, federal, or local historic preservation criteria) were identified on the project site. Additionally, within the urban context of this section of El Camino Real in Millbrae, there is no potential for new construction to have visual or auditory impacts on adjacent properties, because the area is already built up with a mix of modern and historical development. Adding new modern construction to the area does not add new types of elements to the already heavily developed setting. Therefore, the proposed project would have no impact on any known or potential historical resources.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

Impact CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Impact Analysis

Based on a database review of recorded archaeological resources, no known archaeological resources are present in the project site. The area and project site have been heavily developed, and it is very unlikely that buried archaeological resources are present. Although very unlikely, if archaeological resources are encountered during construction, adherence to the aforementioned requirements would be required to ensure that potentially significant archaeological resources are treated appropriately, pursuant to Section 15064.5. As such, Mitigation Measure CUL-1 (PBA EIR MM CUL/TCR-2) would be required and would ensure that impacts associated with damage to buried archaeological resources would remain less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure CUL-1 (PBA EIR MM CUL/TCR-2: Archaeological Resources) is required. Bullet one from the mitigation measure (conduct a records search) has been completed.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact CUL-3: Disturb any human remains, including those interred outside of formal cemeteries?

Impact Analysis

There are no known human remains within the project site and no indications that the project site has been used for burial purposes in the past. Therefore, it is unlikely that human remains would be encountered during construction. However, the proposed project would include ground-disturbing activities and excavation to 9 feet bgs, which could potentially disturb previously undiscovered human burial sites. In the event that previously undiscovered human remains are discovered onsite during project construction, the proposed project would be required to comply with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097. Sections 7052 and 7050.5 of the Health and Safety Code state that the disturbance of Native American cemeteries is a felony, and that construction or excavation be stopped in the vicinity of discovered human remains until the county coroner can determine whether the remains are those of a Native American. If discovered remains are found to be Native American, the coroner must contact the California Native Heritage Commission. Additionally, compliance with Section 15064.5 of the CEQA Guidelines would set forth procedures in the event of an unexpected discovery of Native American human remains on non-federal land. Therefore, with adherence to standard state and federal regulations, impacts related to disturbance of human remains would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

4.5 Energy

	Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

4.5.1 Environmental Setting

Natural gas and electricity are currently provided to the project site by PG&E. Several regulations exist associated with reducing energy usage, one of the most prevalent being Parts 6 and 11 of the California Building Code (California Code of Regulations [CCR], Title 24). Part 6 of the California Building Code, the 2019 Building Energy Efficiency Standards, focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings, and includes requirements that enable both demand reductions and future solar electric and thermal system installations. The 2019 Building Energy Efficiency Standards also include updates to the energy efficiency divisions of Part 11, the 2019 California Green Building Standards (otherwise known as the CALGREEN Code). A set of prerequisites has been established for both the residential and nonresidential standards, which include efficiency measures that should be installed in any building project striving to meet advanced levels of energy efficiency. The California Energy Commission estimates that implementation of the 2019 Building Energy Efficiency Standards may reduce statewide annual electricity consumption by approximately 53 percent, which means less energy would be consumed under the current 2019 standards than under the 2016 standards and may reduce greenhouse gas emissions by 70,000 metric tons over 3 years (California Energy Commission 2019).

The proposed project would be required to comply with all applicable regulations associated with energy efficiency, as well as the applicable City of Millbrae General Plan policies.

4.5.2 Previous Environmental Analysis

4.5.2.1 City of Millbrae General Plan EIR Summary

Chapter 4.8 of the General Plan EIR discusses impacts related to energy. Energy use under the General Plan would be moderated by applicable state regulations and, therefore, would ensure that energy use would not be wasteful, inefficient, or unnecessary. The General Plan EIR also determined that compliance with Title 24 Building Standards Code would help to reduce energy consumption in new developments, indicating that implementation of the General Plan would have a less-than-significant impact on energy use (City of Millbrae 1998b).

The following General Plan policies would be applicable to the proposed project:

Policy C6.15: **Energy Efficiency, Title 24.** Require that all new buildings and additions in the City be in compliance with the energy efficiency standards of Title 24 of the California State Building Code.

Policy C6.16: **Solar Heating and Cooling.** Encourage installation of solar panels for heating and cooling with solar energy.

Policy C6.17: **Solar Heating for Pools.** Encourage property owners to heat all new and existing spas and swimming pools with solar energy.

Policy C6.18: **Energy Conservation.** Promote energy conservation in new and existing development and encourage use of alternative energy sources, including passive heating and cooling, by allowing variances to site or building requirements (i.e., setbacks, lot coverage, building height, etc.) where consistent with public health and safety.

4.5.2.2 Plan Bay Area EIR Summary

Chapter 3.6 of the Plan Bay Area EIR discusses potential impacts related to energy consumption. Implementation of the Plan Bay Area would result in the densification of land use, increased energy efficiency from residential land uses, and a net reduction in the consumption of automotive fuel. Additionally, future land use projects would be required to comply with the Title 24 Building Standards Code and incorporate feasible measures to reduce wasteful, inefficient, or unnecessary consumption of energy during construction or operation, and would increase reliance on renewable energy sources. Therefore, the Plan Bay Area EIR determined that impacts related to energy consumption would be less than significant, and no mitigation measures were identified (MTC/ABAG 2021).

4.5.3 Project-Specific Analysis

Impact EN-1. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Impact Analysis

Construction

Off-Road Equipment

The proposed project is anticipated to be constructed in two phases, with Phase 1 breaking ground April 2023 and Phase 2 completed in February 2026. Table 4.5-1 provides estimates of the proposed project's construction fuel consumption from off-road construction equipment. These estimates were derived from the same assumptions used in the construction air quality analysis for the proposed project.

Table 4.5-1. Construction Off-Road Fuel Consumption

Phase	Construction Activity	Fuel Consumption (Gallons)
Phase 1 –Proposed Apartment Complex	Demolition	4,225
	Site Preparation	7,414
	Grading	16,217
	Trenching	8,274
	Building Construction	33,961
	Architectural Coating	10,703
	Paving	5,712
Phase 2 – Future Hotel	Trenching	4,053
	Site Preparation	7,414
	Grading	10,916
	Building Construction	20,535
	Architectural Coating	7,164
	Paving	5,712
Total		**142,301**

Source: Appendix F, Energy Calculations

As shown in Table 4.5-1, construction activities associated with the proposed project would be estimated to consume 142,301 gallons of diesel fuel. There are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites. Therefore, it is expected that construction fuel consumption associated with the proposed project would not be inefficient, wasteful, or unnecessary, and the impact would be less than significant.

On-Road Vehicles

On-road vehicles for construction workers, vendors, and haulers would require fuel for travel to and from the site during construction. Table 4.5-2 provides an estimate of the total on-road vehicle fuel usage during construction. There are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in other parts of the state. Therefore, it is expected that construction fuel consumption associated with the proposed project would not be inefficient, wasteful, or unnecessary, and the impact would be less than significant.

Table 4.5-2. Construction On-Road Fuel Consumption

Project Phase	Total Annual Fuel Consumption (gallons)
Phase 1 –Proposed Apartment Complex	315,669
Phase 2 – Future Hotel	61,753
Total Construction On-Road Fuel Consumption	**377,421**

Source: Appendix F, Energy Calculations

Long-Term Operations

Transportation Energy Demand

Table 4.5-3 provides an estimate of the daily and annual fuel consumed by vehicles traveling to and from the project site. These estimates were derived using the same assumptions used in the operational air quality analysis for the proposed project.

Table 4.5-3. Long-Term Operational Vehicle Fuel Consumption

Project Component	Trips per Day	Annual VMT	Average Fuel Economy (miles/gallon)	Total Annual Fuel Consumption (gallons)
Proposed Apartment Complex	2,093	8,249,818	34.2	241,223
Future Hotel	1,638	4,061,421	34.2	118,755
			Total	**359,978**

Notes:
Percent of vehicle trips and VMT provided by CalEEMod.
Average fuel economy is provided by United States Department of Transportation, Bureau of Transportation Statistics and reflects fuel economy of overall fleet, not just new vehicles.
CalEEMod = California Emissions Estimator Model
VMT = vehicle miles traveled
Source: Appendix F, Energy Calculations

As shown in Table 4.5-3, annual vehicular fuel consumption is estimated to be 359,978 gallons of both gasoline and diesel fuel. In terms of land use planning decisions, the proposed project would constitute development within an established community and would not be opening up a new geographical area for development such that it would draw mostly new trips or substantially lengthen existing trips. The proposed project would be well positioned to accommodate existing population and reduce vehicle miles traveled (VMT). Additionally, the proposed project would provide high-density housing close to public transit and would promote walking, bicycling, telecommuting, and use of transit and other transportation alternatives. Therefore, the proposed project would encourage the use of alternative modes of transportation and reduce single occupancy vehicle trips and overall project consumption of transportation fuels. For these reasons, it would be expected that vehicular fuel consumption associated with the proposed project would not be inefficient, wasteful, or unnecessary, and the impact would be less than significant.

Building Energy Demand

As shown in Tables 4.5-4 and 4.5-5, the proposed project is estimated to demand 1,627,185 kilowatt hours of electricity and 6,434,187 100-thousands of British Thermal Units of natural gas, respectively, on an annual basis.

Table 4.5-4. Long-Term Electricity Usage

Project Component	Size	Title 24 Electricity Energy Intensity (kWh/size/ year)	Nontitle 24 Electricity Energy Intensity (kWh/size/ year)	Lighting Energy Intensity (kWh/size/ year)	Total Electricity Energy Demand (kWh/size/ year)	Total Electricity Demand (kWh/ year)
Proposed Apartment Complex	384 units	426.45	3054.1	741.44	4221.99	1,621,244
Proposed Apartment Parking Garage with Elevator	548 Spaces	3.92	0.19	1.75	5.86	3,211
Future Hotel	200 rooms	2.19	2.85	3.13	8.17	1,634
Future Hotel Parking Garage with Elevator	187 spaces	3.92	0.19	1.75	5.86	1,096
Total						**1,627,185**

Notes:

The proposed project could potentially include a variety of uses consistent with the development standards; however, the land use selections above were based on estimating the "worst-case" scenario demand for electricity.

ksf = 1,000 square feet

kWh = kilowatt hour

Source: Appendix F, Energy Calculations

Table 4.5-5. Long-Term Natural Gas Usage

Project Component	Size	Title 24 Natural Gas Energy Intensity (KBTU/size /year)	Nontitle 24 Natural Gas Energy Intensity (KBTU/size/ year)	Total Natural Gas Energy Demand (KBTU/size/ year)	Total Natural Gas Demand (KBTU/year)
Proposed Apartment Complex	384 units	6,115	2,615	8,730	3,352,485
Swimming Pool (Residential)	1,000 sf	--	--	--	2,196,000
Spa (Residential)	75 sf	--	--		878,400
Future Hotel	200 rooms	29.4	7.13	36.5	7,302
				Total	**6,434,187**

Notes:

The proposed project could potentially include a variety of uses consistent with the development standards; however, the land use selections above were based on estimating the "worst-case" scenario demand for electricity. ksf = 1,000 square feet

KBTU= 1,000 British Thermal Units

Source: Appendix F, Energy Calculations

The proposed project would comply with the CCR Titles 20 and 24, including CALGREEN, and incorporate building materials, fixtures, and landscaping that promote energy efficiency and water conservation. The proposed project would also comply with the City's Building Code and prepare the proposed apartment complex for installation of rooftop solar panels. Compliance with the current state regulatory requirements for new building construction as required by the Title 24 CALGREEN requirements would increase energy efficiency and reduce energy demand in comparison to the existing hotel and residential structures onsite and, therefore, would reduce actual environmental effects associated with energy use from the proposed project. Therefore, the proposed project would not be wasteful, inefficient, or unnecessary, and the impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact EN-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Analysis

The City's General Plan and Plan Bay Area include energy goals and policies to reduce the reliance on nonrenewable energy sources in existing and new commercial, industrial, and public structures. The City developed several Climate Protection Programs to reduce GHG emissions that include strategies focused on green building, renewable energy, transportation and land use, education, and waste management.

The proposed project would not conflict with the energy objectives of the General Plan, Plan Bay Area, nor the City's Climate Action Plan. The proposed project would constitute development within an established community and would not be opening up a new geographical area for development such that it would draw mostly new trips, or substantially lengthen existing trips. The proposed project would be well positioned to accommodate existing population and reduce VMT. The proposed project would not impede the City's bicycle and pedestrian network, would include onsite and off-site improvements of pedestrian infrastructure (sidewalks), and would provide bicycle parking in accordance with the Millbrae Municipal Code.

The proposed project would comply with the versions of CCR Titles 20 and 24, including CALGREEN, that are applicable at the time that building permits are issued and are in accordance with all applicable City measures.

For the above reasons, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

4.6 Geology and Soils

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving:	☐	☒	☐	☐
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv) 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 indirect 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?	☐	☒	☐	☐

4.6.1 Environmental Setting

The City is located in a seismically active region, and earthquakes have the potential to cause ground shaking in the area. There are no active faults crossing the project site. The closest active faults to the project site include the San Andreas Fault, about 1 mile to the west; the San Gregorio Fault, about 7.5 miles to the southwest; the Hayward Fault, about 16.9 miles to the east; and the Calaveras Fault, about 26 miles to the east (ENGEO 2020). The City also considers the Serra Fault an active fault, because it runs parallel to the San Andreas Fault and nearly bisects the city (City of Millbrae 2016). The California Geological Survey defines an active fault as one that has had surface displacement in the last 11,000 years or has experienced earthquakes in recorded history.

According to USGS, there is a 72 percent probability that between 2014 and 2043, a 6.7 or greater magnitude earthquake will occur in the San Francisco Bay Region (USGS 2016). The probability of a 6.7 magnitude or greater earthquake occurring along individual faults was estimated to be 22 percent along the San Andreas Fault, 6 percent along the San Gregorio Fault, 33 percent along the Hayward Fault, and 11 percent along the Calaveras Fault (USGS 2016).

Ground shaking from an earthquake can result in ground failure, including liquefaction, ground-induced landslides, and subsidence. Based on the topography and soil characteristics present at the project site, risk of ground-induced landslides and subsidence is considered low to negligible at the site (ENGEO 2020). Soils found in the eastern portion of the City have the strongest amplification of ground shaking during an earthquake event and have high susceptibility to liquefaction. The City is not in a state-designated earthquake induced landslide hazard zone; however, historic landslides have occurred in the western portions of the City from heavy rainfall events (City of Millbrae 2016).

The project site is in the eastern portion of the City along the El Camino Real corridor. The site topography is flat, but generally dips to the east from El Camino Real with an elevation ranging from about 30 to 15 feet. A geotechnical study dated October 28, 2016 (updated August 14, 2020) was prepared for the project site by ENGEO Incorporated (Appendix G). During the geotechnical exploration, soil borings collected at the project site encountered urban fill in the upper 3 to 4 feet across the site. Documentation of the manner in which the fill was placed is not available; therefore, it is considered undocumented and may contain unsuitable or poorly compacted materials (ENGEO 2020). Beneath the urban fill layer, the soil borings encountered natural soils deposits from about 4 to 50 feet (maximum depth of soil boring), consisting of alternating layers and variable thicknesses of medium stiff to hard, sandy clay and medium dense to dense, silty sand and sandy silt that are associated with the Colma Formation (ENGEO 2020). Additionally, in the northeastern portion of the project site, the soil borings encountered a natural soil deposit of soft, highly expansive clay. The soft clay layer extended to a depth of approximately 9 feet bgs. This soft clay layer is common in tidal marsh areas along the historic shoreline of the San Francisco Bay. Within this soft clay, wood debris was encountered between 5.5 feet and 8 feet (ENGEO 2020). In the southeastern portion of the project site, groundwater was measured at approximately 12 feet bgs; however, according to data available from the State Water Resources Control Board (SWRCB), groundwater in the vicinity of the project site has been encountered as shallow as 5 feet bgs (ENGEO 2020).

4.6.2 Previous Environmental Analysis

4.6.2.1 City of Millbrae General Plan EIR Summary

Section 4.10 of the General Plan EIR discusses potential impacts on geology, soils, and seismicity (City of Millbrae 1998b). The General Plan EIR does not discuss potential impacts related to paleontological resources (City of Millbrae 1998a), and the General Plan does not include any policies related to such resources (City of Millbrae 1998b). As discussed in the General Plan EIR, the City is in an area with high potential for seismically induced ground shaking, which could potentially result in property damage, injuries, and loss of life. During moderate to strong ground shaking, portions of the City are also susceptible to liquefaction. Additionally, buildings and other improvements constructed in the City may experience differential settlement from consolidated Bay mud. The General Plan EIR determined that compliance with existing federal, state, and local laws and General Plan policies would reduce potential geological impacts to less-than-significant levels (City of Millbrae 1998b).

The following General Plan policies are applicable to the proposed project:

Policy S1.4: **Seismic Safety.** Assure existing and new structures are designed to protect people and property from seismic hazards.

Policy S1.5: **Geologic Studies.** Require geotechnical studies for development proposals; such studies should determine the actual extent of geotechnical hazards, optimum location for structures, the advisability of special structural requirements, and the feasibility and desirability of a proposed facility in a specified location.

Policy S1.6: **Soils and Geologic Review.** Require soils and geologic review of development proposals in accordance with City procedures to assess potential seismic hazards, liquefaction, landslides, mudslides, erosion, sedimentation, and settlement in order to determine if these hazards can be adequately mitigated. Once identified, all areas having unstable soil conditions should be inventoried and monitored.

4.6.2.2 Plan Bay Area EIR Summary

Geology and Soils

Chapter 3.8 of the Plan Bay Area EIR evaluated potential impacts related to geology and soils. The Plan Bay Area EIR determined that all impacts related to geology and soils would be less than significant, and no mitigation measures were identified because there are existing federal, state, and local regulations and oversight in place that would effectively reduce the inherent hazards associated with these conditions to an acceptable level (MTC/ABAG 2021).

Paleontological Resources

Chapter 3.8 of the Plan Bay Area EIR also discusses potential impacts related to paleontological resources that may result from implementation of the proposed Plan Bay Area. As discussed in the Plan Bay Area EIR, projects involving excavation, grading, or soil removal in previously undisturbed areas have the greatest likelihood to encounter these resources and result in a potentially significant impact. The Plan Bay Area EIR identifies Mitigation Measure GEO-7 to reduce impacts related to paleontological resources to a less-than-significant level (refer to Impact GEO-6 in Section 4.6.3, Project-Specific Analysis).

PBA EIR MM GEO-7: Implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

- Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the PRC, adopted county and city general plans, and other federal, State, and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices for the assessment and mitigation of adverse impacts on paleontological resources.
- Obtain review by a qualified paleontologist to determine whether the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological resources or to require the substantial alteration of a unique geologic

feature. The assessment should include museum record searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey if units with paleontological potential are present at the surface.

- Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.
- Implement the following measures where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:
    - All onsite construction personnel shall receive Worker Education and Awareness Program training before the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered;
    - A qualified paleontologist shall prepare a paleontological resource management plan to guide the salvage, documentation, and repository of unique paleontological resources encountered during construction. If unique paleontological resources are encountered during construction, a qualified paleontologist shall oversee the implementation of the paleontological resource management plan.
    - Ground-disturbing activities in parent material with a moderate to high potential to yield unique paleontological resources shall be monitored using a qualified paleontological monitor to determine whether unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.
- Identify where ground disturbance is proposed in a geologic unit having the potential to contain fossils, and specify the need for a paleontological monitor to be present during ground disturbance in these areas.
- Avoid routes and project designs that would permanently alter unique geological features.
- Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.
- If paleontological resources are discovered during earthmoving activities, the construction crew shall be directed to immediately cease work and notify the implementing agencies and/or project sponsors. The project sponsor shall retain a qualified paleontologist for identification and salvage of fossils so that construction delays can be minimized. The paleontologist shall be responsible for implementing a recovery plan, which could include the following:
    - In the event of discovery, salvage of unearthed fossil remains, typically involving simple excavation of the exposed specimen but possibly also plaster-jacketing of large and/or fragile specimens, or more elaborate quarry excavations of richly fossiliferous deposits.
    - Recover stratigraphic and geologic data to provide a context for the recovered fossil remains, typically including description of lithologies of fossil-bearing strata measurement and description of the overall stratigraphic section, and photographic documentation of the geologic setting.

- Clean and repair collected fossil remains to a point of curation, which generally involves removing enclosed rock material, stabilizing fragile specimens (using glues and other hardeners), and repairing broken specimens.
- Catalog and identify prepared fossil remains, which typically involves scientifically identifying specimens, inventorying specimens, assigning catalog numbers, and entering data into an inventory database.
- Transfer, for storage, cataloged fossil remains to an appropriate repository, with consent of property owner.
- Prepare a final report summarizing the field and laboratory methods used, the stratigraphic units inspected, the types of fossils recovered, and the significance of the curated collection.
- Comply (project sponsors) with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect paleontological or geologic resources.

- Prepare significant recovered fossils to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.
  - Following the conclusion of the paleontological monitoring, ensure that the qualified paleontologist prepares a report stating that the paleontological monitoring requirement has been fulfilled and summarizes the results of any paleontological finds. The report shall be submitted to the CEQA lead agency and to the repository curating the collected artifacts and shall document the methods and results of all work completed under the paleontological resources management plan, including the treatment of paleontological materials; results of specimen processing, analysis, and research; and final curation arrangements.

4.6.3 Project-Specific Analysis

Impact GEO-1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

Impact Analysis

i. Fault Rupture

The project site is not located in a designated Alquist-Priolo Earthquake Fault Zone (ENGEO 2020). The closest mapped potentially active faults to the project site include the San Andreas Fault and the Serra Fault, about 1 mile to the west; the San Gregorio Fault, about 7.5 miles to the southwest; the

Hayward Fault, about 16.9 miles to the east; and the Calaveras Fault, about 26 miles to the east (ENGEO 2020). None of these faults are mapped within the project site. Therefore, the potential for damage to structures at the project site due to rupture of a known earthquake fault is low and impacts would be less than significant.

ii. Ground Shaking

The project site is in a seismically active region, and earthquake-related ground shaking is expected to occur during the design life of the proposed project. Construction of the proposed project would be required to conform to the latest edition of the California Building Code, which includes engineering standards appropriate to withstand anticipated ground accelerations at the project site. Conformance with the earthquake design parameters of the California Building Code would be subject to City review as part of the building permit review process. In addition, the proposed project would be subject to General Plan Policies S1.4, S1.5, and S1.6, which require new developments to prepare geotechnical studies to assess the potential seismic hazards at the site and identify structural requirements for the development. The structural requirements identified in the geotechnical study would be incorporated into the proposed project as part of Mitigation Measure GEO-1. As such, compliance with the California Building Code and implementation of Mitigation Measure GEO-1 would reduce the risks from ground shaking to a less-than-significant level.

iii. Ground Failure, including Liquefaction

The project site is not located within areas mapped by USGS as being susceptible to liquefaction except for the northern corner in the area of the former tidal marsh where it is mapped (ENGEO 2020). Groundwater was measured at approximately 12 feet bgs; however, according to data available from the SWRCB groundwater in the vicinity of the project site has been encountered as shallow as 5 feet bgs (ENGEO 2020). The geotechnical study includes a quantitative analysis of the liquefaction potential at the project site and concluded that the site may experience up to 1.75 inches of total settlement from liquefaction of material that was primarily encountered from 5 to 20 feet bgs. The geotechnical exploration also concluded that differential settlement would be approximately half of the total settlement over 50 feet (less than 1 inch over 50 feet) (ENGEO 2020). In addition, based on the depth of liquefiable layers and thickness of non-liquefiable soil overlying the liquefiable layers, some adverse secondary ground effects may be possible if liquefaction were to occur, such as sand boils and fissures (ENGEO 2020). Construction of the proposed project would be required to conform to the latest edition of the California Building Code, which contains seismic building criteria and standards that are designed to reduce liquefaction risks to acceptable levels. The proposed project would also implement Mitigation Measure GEO-1 and incorporate the recommendations identified by the geotechnical study into the project design and building foundations to reduce impacts related to liquefaction and secondary ground effects (e.g., sand boils and fissures). Therefore, compliance with the California Building Code and implementation of Mitigation Measure GEO-1 would reduce impacts from ground failure and liquefaction to a less-than-significant level.

iv. Landslides

The site topography is flat, but generally dips to the east from El Camino Real. The site elevation ranges from 30 to 15 feet. The project site is not in a state-designated earthquake induced landslide hazard zone (USGS 2016). Therefore, the project site would not be subject to seismically induced landslide hazards, and no impact would occur.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure GEO-1 (Implement Geotechnical Design Recommendations) is required.

> **MM GEO-1: Implement Geotechnical Design Recommendations.** Prior to issuance of grading permits for the proposed apartment complex, the applicant shall incorporate all design specifications and recommendations contained within the final geotechnical study prepared by ENGEO on October 28, 2016 (Updated August 14, 2020) into relevant project plans and specifications. These specifications pertain to but are not limited to existing undocumented fills in areas of the site, potential loose layers susceptible to liquefaction and seismic settlement, compressible soils, and dewatering. The applicant shall also hire a licensed geotechnical engineer to prepare a final detailed geotechnical study for the future hotel. The final geotechnical study for the future hotel shall include the current requirements of the California Building Code at the time of application and specifications related to the foundation design of the future hotel, and the City shall require the applicant to implement the specifications and recommendations contained within the final geotechnical study as conditions of approval. The project site plans for the proposed apartment complex and future hotel shall be submitted to the City and reviewed as part of the building permit review process.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact GEO-2. Result in substantial soil erosion or the loss of topsoil?

Impact Analysis

Project construction would involve demolition of existing structures, removal of onsite vegetation and impervious surfaces, grading, utility connections, building construction, frontage improvements (e.g., new curb, gutter, sidewalk and driveway construction), and landscaping on approximately 6.7 acres. Construction of the proposed project would export approximately 5,022 cubic yards of soil and import approximately 26,734 cubic yards of soil, which could expose unprotected soils to stormwater runoff and cause erosion and loss of topsoil. The proposed project would comply with Chapter 9.45 of the Millbrae Municipal Code and be required to obtain a grading permit and implement an interim erosion control plan during construction. The erosion control plan would identify erosion and sediment control techniques to minimize erosion during grading. Additionally, the proposed project would disturb more than 1 acre and accordingly be required to comply with the National Pollutant Discharge Elimination System (NPDES) permitting program and implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would identify BMPs to control the discharge of sediment and other pollutants during construction. As discussed in Section 4.9, Hydrology and Water Quality, the proposed project would implement a SWPPP and associated BMPs as part of Mitigation Measure HYD-1 (see Section, 4.9.3, Project-Specific Analysis) to reduce erosion impacts. Therefore, the proposed project would not result in substantial soil erosion or loss of topsoil, and impacts would be less than significant with implementation of Mitigation Measure HYD-1.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure HYD-1 (Prepare and Implement a SWPPP) is required.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact GEO-3. Be located on strata 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 Analysis

The geotechnical exploration encountered urban fill across the project site, within the upper 3 to 4 feet. Documentation of the manner at which the fill was placed is not available; therefore, it is considered undocumented and may contain unsuitable or poorly compacted materials (ENGEO 2020). Beneath the urban fill layer, the soil borings consisted of alternating layers and variable thicknesses of medium stiff to hard, sandy clay and medium dense to dense, silty sand and sandy silt that are associated with the Colma Formation (ENGEO 2020). The soil borings also encountered soft, highly expansive clay and wood debris in the northeast portion of the project site that extended approximately 9 feet bgs (ENGEO 2020). As such, the surface material and underlying soils have varying strengths and could experience varying levels of differential settlement when subjected to new added loads.

The northern corner of the project site is also mapped by USGS as being susceptible to liquefaction (ENGEO 2020). Based on the liquefaction analysis provided in the geotechnical study, the project site may experience up to 1.75 inches of total settlement from liquefaction of material that was primarily encountered from 5 to 20 feet bgs (ENGEO 2020).

The depth of groundwater could further add to the potential for structural instability of the project site. Since excavation of compressible soil may extend below groundwater, the bottom of the excavation may become oversaturated and require localized dewatering. The geotechnical study recommends that the proposed project remove the undocumented fill and compressible soils from the project site that extend from 3 to 9 feet bgs (ENGEO 2020). Further, the geotechnical study recommends that temporary dewatering be provided for areas of excavation where the base of the excavation is near or below the groundwater table. Based on data available from SWRCB, groundwater in the vicinity of the project site has been encountered as shallow as 5 feet bgs. Therefore, construction activities may encounter groundwater if excavating 5 feet bgs or deeper.

The proposed project would comply with the latest edition of the California Building Code and would incorporate the recommendations identified in the geotechnical study as Mitigation Measure GEO-1 to ensure the stability of foundations and reduce potential for differential settlement. During construction activities, such as excavation and trenching, encounter groundwater, temporary dewatering would be required. All dewatering activities would be required to comply with the RWQCB construction dewatering permit requirements and either obtain a NPDES permit, or a waiver (exemption) from the San Francisco Bay RWQCB. As required by Mitigation Measure GEO-2,

the project contractor would prepare a dewatering plan outlining the selected temporary dewatering system for the proposed project. The dewatering plan would detail the location of dewatering activities, equipment, and discharge point in accordance with the requirements of the San Francisco Bay RWQCB. The dewatering plan would be submitted to the City for review and approval. In the event that shoring methods are implemented for any excavations, the project contractor would be required to prepare shoring plans in accordance with the California Division of Occupational Safety and Health regulations. The shoring plans would be submitted to the City for approval. Accordingly, impacts related to unstable soils would be less than significant with implementation of Mitigation Measures GEO-1 and GEO-2.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure GEO-1 (Implement Geotechnical Design Recommendations) and Mitigation Measure GEO-2 (Prepare and Implement Dewatering and Shoring Plans) are required.

> **MM GEO-2: Prepare and Implement Dewatering and Shoring Plans.** If excavation to 5 feet bgs or deeper is required for the proposed project, a dewatering plan shall be submitted to the City for approval prior to the issuance of a grading permit. At a minimum, the dewatering plan shall detail dewatering methods, location of dewatering activities, equipment, groundwater sampling, disposal, and discharge point in accordance with the requirements of the San Francisco Bay RWQCB. In the event shoring methods are implemented for any excavations, shoring plans shall be submitted to the City for approval prior to the issuance of a grading permit. All shoring plans shall be prepared in accordance with the California Division of Occupational Safety and Health regulations.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact GEO-4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?

Impact Analysis

The project site contains highly expansive clay soils that could be subject to shrinking and swelling as moisture is lost and gained throughout the year. This shrinking and swelling can cause cracks in foundations, slabs, and pavement if not properly managed. The proposed project would comply with the latest edition of the California Building Code and incorporate the recommendations identified in the geotechnical study as required by Mitigation Measure GEO-1. The geotechnical study recommends that the proposed project remove the undocumented fill and expansive clay soils from the project site that extend from 3 to 9 feet bgs (ENGEO 2020). Once the undocumented fill and expansive clay soils are removed, the geotechnical study recommends that the project site be backfilled with compacted engineered fill material. All project structures would be placed above-ground and would not be located on expansive soil. Therefore, impacts related to expansive soils would be less than significant with Mitigation Measure GEO-1 incorporated.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure GEO-1 (Implement Geotechnical Design Recommendations) is required.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact GEO-5. 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 Analysis

The proposed project would connect directly to the City's existing municipal sewer system and would not require septic tanks or any other alternative wastewater disposal system. Therefore, no impact would occur.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

Impact GEO-6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact Analysis

The project site is currently developed with the El Rancho Inn, two residential buildings, and surface parking. As stated above, artificial fill occupies the top approximately 4 feet at the project site, and no paleontological resources of scientific significance would occur in this artificial fill. Underlying soils at the project site extending from about 4 to 50 feet (maximum depth of soil boring) are Pleistocene marine and marine terrace deposits, specifically the Colma Formation, which are sensitive for paleontological resources. Construction of the proposed project would include some ground disturbance during construction-related activities, including grading and excavations, which would extend to approximately 9 feet bgs and could encounter unknown paleontological resources within the Colma Formation. If unknown unique paleontological resources are discovered onsite during construction, Mitigation Measure GEO-3 (PBA EIR MM GEO-7) would be implemented to ensure that proper treatment and documentation of all discovered paleontological or geological resources is performed as required by PRC Section 5097 and Section 15064.5(f) of the CEQA Guidelines. As such, potential impacts on unknown paleontological or unique geologic resources

would be less than significant with implementation of Mitigation Measure GEO-3 (PBA EIR MM GEO-7).

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure GEO-3 (PBA EIR MM GEO-7: Paleontological Resources) is required.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

4.7 Greenhouse Gases

	Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b)	Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

4.7.1 Environmental Setting

The information in this section is summarized from the Air Quality and Greenhouse Gas Assessment (Appendix B) prepared for the proposed project by Illingworth and Rodkin, Inc. on December 11, 2019 (updated August 20, 2020).

GHGs and climate change are cumulative global issues. CARB and USEPA regulate GHG emissions within the State of California and the United States, respectively. While CARB has the primary regulatory responsibility within California for GHG emissions, local agencies can also adopt policies for GHG emission reduction.

Many chemical compounds in the Earth's atmosphere act as GHGs because they absorb and emit radiation within the thermal infrared range. When radiation from the Sun reaches the Earth's surface, some of it is reflected back into the atmosphere as infrared radiation (heat). GHGs absorb this infrared radiation and trap the heat in the atmosphere. Over time, the amount of energy from the Sun to the Earth's surface should be approximately equal to the amount of energy radiated back into space, leaving the temperature of the Earth's surface roughly constant. Many gases exhibit these "greenhouse" properties. Some of them occur in nature (water vapor, carbon dioxide, methane, and nitrous oxide) while others are exclusively human made (like gases used for aerosols) (USEPA 2014).

The principal climate change gases resulting from human activity that enter and accumulate in the atmosphere are listed below:

- **Carbon Dioxide (CO_2):** CO_2 enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and chemical reactions (e.g., the manufacture of cement). CO_2 is also removed from the atmosphere (or "sequestered") when it is absorbed by plants as part of the biological carbon cycle.
- **Methane (CH_4):** CH_4 is emitted during the production and transport of coal, natural gas, and oil. CH_4 emissions also result from livestock and agricultural practices and the decay of organic waste in municipal solid waste landfills.
- **Nitrous Oxide (N_2O):** N_2O is emitted during agricultural and industrial activities as well as during combustion of fossil fuels and solid waste.

- **Fluorinated Gases:** Hydrofluorocarbons (HFCs), perfluorinated chemicals (PFCs), and sulfur hexafluoride (SF_6) are synthetic, powerful climate-change gases that are emitted from a variety of industrial processes. Fluorinated gases are often used as substitutes for ozone-depleting substances (e.g., chlorofluorocarbons, hydrochlorofluorocarbons, and halons). These gases are typically emitted in smaller quantities, but because they are potent climate-change gases, they are sometimes referred to as high global warming potential gases.

4.7.1.1 Emissions Inventories and Trends

California's annual statewide GHG emission inventory is an important tool for establishing historical emission trends and tracking California's progress in reducing GHGs. In concert with data collected through various California Global Warming Solutions Act (Assembly Bill [AB] 32) programs, the GHG inventory is a critical piece in demonstrating the state's progress in achieving the statewide GHG target. The inventory provides estimates of anthropogenic GHG emissions within California, as well as emissions associated with imported electricity; natural sources are not included in the inventory. The inventory for 2017 shows that California's GHG emissions continue to decrease. In 2017, emissions from GHG emitting activities statewide were 424 million metric tons of CO_2 equivalent ($MMTCO_2e$), 5 $MMTCO_2e$ lower than 2016 levels and 7 $MMTCO_2e$ below the 2020 GHG limit of 431 $MMTCO_2e$. Consistent with recent years, these reductions have occurred while California's economy has continued to grow and generate jobs. Compared to 2016, California's GDP grew 3.6 percent while the carbon intensity of its economy declined by 4.5 percent. The most notable highlights in the inventory include the following:

- For the first time since California started to track GHG emissions, in-state and total electricity generation from zero-GHG sources (for purposes of the GHG inventory, these include solar, hydro, wind, and nuclear) exceeded generation from GHG-emitting sources.
- The transportation sector remains the largest source of GHG emissions in the state, but saw a 1 percent increase in emissions in 2017, the lowest growth rate over the past 4 years.
- Emissions from all other sectors have remained relatively constant in recent years, although emissions from high global warming potential gases have continued to increase as they replace ozone depleting substances banned under the 1987 Montreal Protocol.

4.7.1.2 Potential Environmental Effects

For California, climate change in the form of warming has the potential to incur and exacerbate environmental impacts, including but not limited to changes to precipitation and runoff patterns, increased agricultural demand for water, inundation of low-lying coastal areas by sea-level rise, and increased incidents and severity of wildfire events. Although certain environmental effects are widely accepted to be a potential hazard to certain locations, such as rising sea level for low-lying coastal areas, it is currently infeasible to predict all environmental effects of climate change on any one location.

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on Earth. A project's GHG emissions are at a micro-scale relative to global emissions but could result in

a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact.

4.7.1.3 Assembly Bill 32, California Global Warming Solutions Act (2006)

AB 32, the Global Warming Solutions Act of 2006, codified the State's GHG emissions target by directing CARB to reduce the State's global warming emissions to 1990 levels by 2020. AB 32 was signed and passed into law by Governor Schwarzenegger on September 27, 2006. Since that time, the CARB, California Energy Commission, California Public Utilities Commission, and Building Standards Commission have all been developing regulations that will help meet the goals of AB 32 and Executive Order S-3-05.

A Scoping Plan for AB 32 was adopted by CARB in December 2008. It contains the state's main strategies to reduce GHGs from business-as-usual emissions projected in 2020 back down to 1990 levels. Business-as-usual is the projected emissions in 2020, including increases in emissions caused by growth, without any GHG reduction measures. The Scoping Plan has a range of GHG reduction actions, including direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

4.7.1.4 Senate Bill 375, California's Regional Transportation and Land Use Planning Efforts (2008)

California enacted legislation (SB 375) to expand the efforts of AB 32 by controlling indirect GHG emissions caused by urban sprawl. SB 375 provides incentives for local governments and applicants to implement new conscientiously planned growth patterns. This includes incentives for creating attractive, walkable, and sustainable communities and revitalizing existing communities. The legislation also allows applicants to bypass certain environmental reviews under CEQA if they build projects consistent with the new sustainable community strategies. Development of more alternative transportation options that would reduce vehicle trips and miles traveled, along with traffic congestion, would be encouraged. SB 375 enhances CARB's ability to reach the AB 32 goals by directing the agency in developing regional GHG emission reduction targets to be achieved from the transportation sector for 2020 and 2035. CARB works with the metropolitan planning organizations (e.g., ABAG and MTC) to align their regional transportation, housing, and land use plans to reduce VMT and demonstrate the region's ability to attain its GHG reduction targets. A similar process is used to reduce transportation emissions of ozone precursor pollutants in the Bay Area.

4.7.1.5 Senate Bill 350 Renewable Portfolio Standards

In September 2015, the California Legislature passed SB 350, which increases the states Renewables Portfolio Standard for content of electrical generation from the 33 percent target for 2020 to a 50 percent renewables target by 2030.

4.7.1.6 Senate Bill 100 Current Renewable Portfolio Standards

In September 2018, SB 100 was signed by Governor Brown to revise California's Renewable Portfolio Standards program goals, furthering California's focus on using renewable energy and carbon-free power sources for its energy needs. The bill would require all California utilities to supply a specific percentage of their retail sales from renewable resources by certain target years.

By December 31, 2024, 44 percent of the retail sales would need to be from renewable energy sources; by December 31, 2027 the target would be 52 percent, and by December 31, 2030 the target would be 60 percent. By December 31, 2045, all California utilities would be required to supply retail electricity that is 100 percent carbon-free and sources from eligible renewable energy resource to all California end-use customers.

4.7.1.7 Executive Order S-3-05 California GHG Reduction Targets

Executive Order S-3-05 was signed by Governor Schwarzenegger in 2005 to set GHG emission reduction targets for California. The three targets established by this executive order are as follows: (1) reduce California's GHG emissions to 2000 levels by 2010, (2) reduce California's GHG emissions to 1990 levels by 2020, and (3) reduce California's GHG emissions by 80 percent below 1990 levels by 2050.

4.7.1.8 Executive Order EO-B-30-15 (2015) and SB 32 GHG Reduction Targets

In April 2015, Governor Brown signed Executive Order EO-B-30-15, which extended the goals of AB 32, setting a GHG emissions target at 40 percent of 1990 levels by 2030. On September 8, 2016, Governor Brown signed SB 32, which legislatively established the GHG reduction target of 40 percent of 1990 levels by 2030. In November 2017, CARB issued California's 2017 Climate Change Scoping Plan. While the state is on track to exceed the AB 32 scoping plan 2020 targets, this plan is an update to reflect the enacted SB 32 reduction target.

The new Scoping Plan establishes a strategy that will reduce GHG emissions in California to meet the 2030 target:

- Implement the Cap-and-Trade program that places a firm limit on 80 percent of the state's emissions;
- Achieve a 50-percent Renewable Portfolio Standard by 2030 (currently at about 29 percent statewide);
- Increase energy efficiency in existing buildings;
- Develop fuels with an 18-percent reduction in carbon intensity;
- Develop more high-density, transit-oriented housing;
- Develop walkable and bikeable communities;
- Greatly increase the number of electric vehicles on the road and reduce oil demand in half;
- Increase zero-emissions transit so that 100 percent of new buses are zero emissions;
- Reduce freight-related emissions by transitioning to zero emissions where feasible and near-zero emissions with renewable fuels everywhere else; and
- Reduce "super pollutants" by reducing methane and hydrofluorocarbons or HFCs by 40 percent.

In the updated Scoping Plan, CARB recommends statewide targets of no more than 6 metric tons of carbon dioxide equivalent ($MTCO_2e$) per capita (statewide) by 2030 and no more than 2 $MTCO_2e$ per capita by 2050. The statewide per capita targets account for all emissions sectors in the state, statewide population forecasts, and the statewide reductions necessary to achieve the 2030

statewide target under SB 32 and the longer-term state emissions reduction goal of 80 percent below 1990 levels by 2050.

4.7.1.9 Executive Order B-55-18 Carbon Neutrality

In 2018, a new statewide goal was established to achieve carbon neutrality as soon as possible, but no later than 2045, and to maintain net negative emissions thereafter. CARB and other relevant state agencies are tasked with establishing sequestration targets and create policies/programs that would meet this goal.

4.7.1.10 California Building Standards Code Title 24 Part 11 & Part 6

The California Green Building Standards Code (CALGreen Code) is part of the California Building Standards Code under Title 24, Part 11. The CALGreen Code encourages sustainable construction standards that involve planning/design, energy efficiency, water efficiency, resource efficiency, and environmental quality. These green building standards codes are mandatory statewide and are applicable to residential and non-residential developments. The most recent CALGreen Code (2019 California Building Standards Code) became effective as of January 1, 2020.

The California Building Energy Efficiency Standards (California Energy Code) is under Title 24, Part 6 and is overseen by the California Energy Commission. This code includes design requirements to conserve energy in new residential and non-residential developments, while being cost effective for homeowners. This energy code is enforced and verified by cities during the planning and building permitting process. The current energy efficiency standards (2019 Energy Code) were effective as of January 1, 2020. Under the 2019 standards, single-family homes are predicted to be 53 percent more efficient than homes build under the 2016 standard and nonresidential developments are predicted to use 30 percent less energy.

4.7.1.11 Greenhouse Gas Significance Thresholds

The City's 2020 Climate Action Plan (CAP) was adopted by the City on October 27, 2020. The 2020 CAP sets policies, GHG emissions reduction targets, and measures for reducing GHGs to reduce 2005 base year GHG emissions 32 percent by 2025 and 49 percent by 2030, which aligns with the SB 32 goal of reducing GHG emissions 40 percent below 1990 levels. The 2020 CAP includes community measures to increase energy efficiency, increase water efficiency, encourage alternative modes of transportation, and reduce waste.

The City prepared the 2020 CAP consistent with CEQA Guidelines Section 15183.5. This section of the CEQA Guidelines provides that a "Plan for the Reduction of Greenhouse Gas Emissions," which meets the specified requirements, "may be used in the cumulative impacts analysis of later projects." (CEQA Guidelines § 15183.5[b]). More specifically, "[l]ater project-specific environmental documents may tier from and/or incorporate by reference" the "programmatic review" conducted for the GHG reduction plan. (CEQA Guidelines § 15183.5[a]). "An environmental document that relies on a greenhouse gas reduction plan for a cumulative impacts analysis must identify those requirements specified in the plan that apply to the project, and, if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project." (CEQA Guidelines § 15183.5[b][2]). Because global climate change, by its very nature, is a global cumulative impact, an individual project's compliance with a qualifying GHG

reduction plan may suffice to mitigate the project's incremental contribution to that cumulative impact to a level that is not "cumulatively considerable" (CEQA Guidelines § 15064[h][3]).

The City's 2020 CAP outlines how individual projects can tier from the programmatic CAP CEQA analysis for project-level GHG emissions analyses. Specifically, all new projects must submit a CEQA GHG Emissions Compliance Checklist to demonstrate consistency with the City reduction targets and CEQA Guidelines. The consistency analysis for the proposed project is summarized in Section 4.7.3 and the compliance checklist is provided in Appendix M. If the proposed project is consistent with the 2020 CAP, it would not conflict with the City's ability to achieve future emissions reduction goals, and GHG emissions would be less than significant.

4.7.2 Previous Environmental Analysis

4.7.2.1 City of Millbrae General Plan EIR Summary

While the General Plan EIR does not discuss impacts related to GHG specifically, it does discuss the potential impacts to energy in Chapter 4.8. As discussed in the General Plan EIR, potential energy impacts would result from construction of new buildings such as hotels, offices, condominiums, and retail restaurant complexes which would increase energy consumption by 177,265 therms of gas per year and 19.26 million kilowatt hours of electricity. However, implementation of policies listed in the General Plan EIR would reduce these impacts to a less-than-significant level (City of Millbrae 1998b).

The following General Plan policies would be applicable to the proposed project:

Policy H2.4: **Energy Conservation in New Housing.** Promote the use of energy conservation in residential construction by incorporating energy conservation in all new residential development. New homes shall meet State standards for energy conservation.

Policy PC6.15: **Energy Efficiency.** Require that all new buildings and additions in the City be in compliance with the energy efficiency standards of Title 24 of the California State Building Code.

Policy PC6.16: **Solar Heating and Cooling.** Encourage installation of solar panels for heating and cooling with solar energy.

Policy PC6.17: **Solar Heating for Pools.** Encourage property owners to heat all new and existing spas and swimming pools with solar energy.

Policy PC6.18: **Energy Conservation.** Promote energy conservation in new and existing development and encourage use of alternative energy sources, including passive heating and cooling, by allowing variances to site or building requirements (i.e., setbacks, lot coverage, building height, etc.) where consistent with public health and safety.

4.7.2.2 Plan Bay Area EIR Summary

The following summarizes the potential impacts related to GHGs discussed in Chapter 3.6 of the Plan Bay Area EIR and includes the complete text of mitigation measures previously identified by the Plan Bay Area EIR that are applicable to the proposed project.

Impact GHG-1: Net Increase in Direct and Indirect GHG Emissions. The Plan Bay Area EIR determined that implementation of the Plan Bay Area would result in a net reduction in GHG emissions in 2050 when compared to 2015 conditions. However, because construction emissions may not be reduced to net zero in all cases, this impact would be significant, even with implementation of Mitigation Measure GHG-1. Mitigation Measure GHG-1 is not applicable to the proposed project because the proposed project is consistent with all applicable measures listed in the City's 2020 CAP (refer to Impact GHG-1 in Section 4.7.3, Project-Specific Analysis).

Impact GHG-2: Conflict with Applicable Bay Area Region's GHG Reduction Goals. The Plan Bay Area EIR determined that implementation of the Plan Bay Area would not substantially conflict with the Bay Area's GHG reduction goals, and impacts would be less than significant. No mitigation measures were identified.

Impact GHG-3: Conflict with Applicable State Plans, Policies, or Regulations. The Plan Bay Area EIR determined that implementation of the Plan Bay Area could substantially conflict with the goal of SB 32 to reduce statewide GHG emissions because it would not meet the target reductions of 41 percent below 2015 levels by 2030 and 83 percent below 2015 levels by 2050. Even with implementation of Mitigation Measure GHG-3 and TRA-2a and TRA-2b, impacts would be significant and unavoidable. However, Mitigation Measure GHG-3 is not applicable to the proposed project because it is a plan-level mitigation measure regarding implementation of CAPs and other regional plans for reducing GHG emissions.

Impact GHG-4: Conflict with Local Policies or Plans. The Plan Bay Area EIR determined that implementation of the Plan Bay Area would not substantially conflict with local climate action plans or GHG reduction plans, and impacts would be less than significant. No mitigation measures were identified.

4.7.3 Project-Specific Analysis

Impact GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Analysis

As previously discussed, the City adopted the 2020 CAP to reduce community GHG emissions consistent with the State's 2030 GHG reduction target adopted under SB 32. The 2020 CAP includes measures to make homes more energy efficient and increase the amount of locally produced renewable energy. It recommends development patterns that emphasize complete streets that allow people to go about their business on foot, by bicycle, or via public transportation. It provides transit solutions and offers ways to reduce waste that would otherwise go to landfills. Finally, it outlines measures that will continue to make municipal government operations an efficient and environmentally responsible organization (City of Millbrae 2020a).

The City developed the CEQA GHG Emissions Compliance Checklist to assess project-level consistency with the 2020 CAP. The checklist identifies "measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved" (City of Millbrae 2020b). There is a total of 43 measures in the 2020 CAP that are intended to reduce communitywide GHG emissions. Of the 43 measures, 28 measures would apply to the proposed project as they relate to new residential and commercial development.

The completed checklist for the proposed project is presented in Appendix M. Table 4.7-1 summarizes the consistency analysis and describes how the proposed project complies with each applicable 2020 CAP measure. Note that these measures primarily address GHG emissions resulting from long-term operation of the proposed project. However, the City's checklist acknowledges that "GHG emissions associated with construction from a land use development project are generally orders of magnitude lower than the operational emissions from a project" (City of Millbrae 2020b). This is because of their short duration compared to the project's overall lifetime. Indeed, GHG emissions associated with construction for the proposed apartment complex were estimated to be 2,185 $MTCO_2e$, or 2,964 $MTCO_2e$ with inclusion of the hotel (see Appendix B). The BAAQMD (2017) CEQA Guidelines encourage lead agencies to incorporate BMPs to reduce construction-generated GHG emissions. As discussed in Impact AIR-1, the proposed project would implement Mitigation Measure AIR-1 (PBA EIR MM AQ-2) which includes the BAAQMD construction best practices.

Table 4.7-1. Project Consistency with Applicable Emission Reduction Measures from the City's 2020 Climate Action Plan

Number	Measure	Description	Project Consistency
1	Commercial Green Building Ordinance	Adopt the latest version of the CALGreen Code for non-residential new construction and major remodels for applicable updates outside of the Reach Codes.	**Consistent.** The future hotel would comply with the Title 24 CALGREEN requirements by incorporating building materials, fixtures, and landscaping that promote energy efficiency and water conservation.
2	Residential Green Building Ordinance	Adopt the latest version of the CALGreen Code for residential new construction and major remodels for applicable updates outside of the Reach Codes.	**Consistent.** The proposed apartment complex would comply with the Title 24 CALGREEN requirements by incorporating building materials, fixtures, and landscaping that promote energy efficiency and water conservation.
3	Residential Energy Efficiency Incentives and Rebates	Strive to 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.** The proposed apartment complex would use Energy Efficient appliances and will seek any available rebates associated with their use.

Number	Measure	Description	Project Consistency
4	Commercial Energy Efficiency Incentives and Rebates	Strive to 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.** The future hotel would use energy-efficient appliances and would seek any available rebates associated with their use.
5	Residential Energy/Water Conservation Program	Comply with the most recent residential energy conservation ordinance by meeting minimum energy-efficiency standards upon the sale of the building, if required. Meet minimum water-efficiency standards.	**Consistent.** The proposed project would comply with all local ordinances and efficiency standards effective at the time of construction.
6	Commercial Energy/Water Conservation Program	Comply with the most recent commercial energy conservation ordinance by meeting minimum energy-efficiency standards upon the sale of the building, if required. Meet minimum water-efficiency standards.	**Consistent.** The proposed project would comply with all local ordinances and efficiency standards effective at the time of construction.
7	Tree Planting Program	Provide shade trees for buildings with eastern, western, or southern exposures.	**Consistent.** The proposed project would result in a net increase of 315 trees onsite, including trees along the buildings eastern, western, and southern exposures.
9	Residential and Commercial All-Electric Ordinance	Include all electric residential or commercial new construction and/or remodels, including for electric lighting, cooking, and water heating.	**Consistent.** The Start Year under the CAP is 2021 with multi-family projects entitled within the year of adoption to be exempt. The proposed multi-family residential project is also exempt from the City's all-electric ordinance per the Settlement Agreement but would nonetheless use all electric equipment with the exception of water heating. The future hotel would be required to comply with the City's adopted all-electric ordinance
10	Promote Solar Installations	Continue to participate in bulk purchase program such as the Peninsula SunShares Program. Promote the installation of solar among residents and businesses in the community.	**Consistent.** The proposed project would comply with the City's Building Code and prepare the proposed apartment complex and future hotel for installation of rooftop solar panels.

Number	Measure	Description	Project Consistency
11	Residential and Commercial Participation in Community Choice Aggregation	Strive to retain Peninsula Clean Energy as the energy provider and encourage occupants to opt for the 100% renewable energy option (highly recommended).	**Consistent.** The proposed project would review Peninsula Clean Energy as a potential energy provider at the time the energy provider is being selected.
12	New Non-Residential Buildings Solar Requirement	Update building code to mandate that all commercial new construction and major remodels install a solar PV system at time of construction.	**Consistent.** The proposed project would comply with the City's Building Code and prepare the future hotel for installation of rooftop solar panels.
13	Paring Battery Storage with Solar PV Systems	Strive to provide education and outreach regarding the benefits of pairing battery storage with solar PV systems to related business, residents, and contractors.	**Consistent.** The proposed project has researched the benefits pairing battery solar with solar PV.
14	Energy Efficient Street Lighting	Continue to replace street, signal, parks, and parking lot lighting with efficient lighting.	**Consistent.** All exterior lighting would be compliant with Title 24 CALGREEN requirements.
20	Water Conservation Incentives	Install and maintain water-efficiency appliances and fixtures.	**Consistent.** The proposed project would incorporate appliances and fixtures that promote water conservation.
21	Water Efficient Landscape Ordinance and CALGreen Indoor Water Efficiency Requirements	Continue implementation of the State Model Water Efficient Landscape Ordinance and CALGreen indoor water efficiency requirements.	**Consistent.** The proposed project would provide 53,010 square feet of new landscaping. The new landscape plantings would consist of drought-resistant shrubs and shade trees in accordance with the City's Model Water Efficient Landscape Ordinance.
22	Residential "Graywater Ready" New Construction	Encourage new construction projects to be built "graywater ready" by educating applicants during the design phase of projects.	**Consistent.** The proposed project would include a stub-out to provide future connection to the City's graywater system when available, for use for outdoor landscaping. The proposed buildings would connect to the City's municipal sewer system.

Number	Measure	Description	Project Consistency
23	Smart Growth Development	Continue Smart Growth Policy that prioritizes infill, higher density, transportation oriented, and mixed-use development.	**Consistent.** The proposed project involves the development of a high-density apartment complex and future hotel on a 6.7-acre infill site. The proposed project is a transit priority project as defined by PRC Section 21155(b). The proposed project would be served by the ECR SamTrans bus route, which is a high-quality transit corridor that provides service along El Camino Real every 15-minutes on weekdays and stops at the Millbrae BART/Caltrain station, Palo Alto Transit Center, Daly City BART station, and SFO.
24	Walkable / Bikeable Street Landscape	Remake urban landscape to make walking and biking more desirable, such as bike lanes, bike parking, traffic calming, beautification, etc.	**Consistent.** The proposed project would exceed the requirements of Section 10.05.2120 of the Millbrae Municipal Code and provide 60 long-term and 12 short-term bicycle parking spaces for residents and visitors for a total of 72 bicycle parking spaces. Long-term bicycle parking spaces would be provided in two dedicated storage rooms located on the ground floor and first level of the parking garage, and bicycle racks would be provided along Center Street for short-term parking. The ground floor of the apartment complex would also include a bike station for maintenance and repairs. The future hotel component would also be subject to the requirements of Section 10.05.2120 of the Millbrae Municipal Code and required to provide at least 19 bicycle parking spaces (10 percent of vehicle parking provided) for future hotel guests.
25	Safe Routes to School	Establish bike trails and safe pedestrian routes to local schools?	**Consistent.** The proposed project includes several improvements along Center Street including sidewalk connections and crosswalks that would improve the safety of pedestrian routes through the project site.

Number	Measure	Description	Project Consistency
28	Bike Sharing	Accommodate shared bike service as requested by the City.	**Consistent.** As part of the proposed project's transportation demand management plan, the project would provide 10 shared use bikes for residents. Information packets would also be provided to residents including additional information the bike share program.
29	Car Sharing	Open a car sharing station or provide car sharing parking as requested by the City.	**Consistent.** The proposed project would include a new entry drive isle connecting El Camino Real and Center Street. Along this entry drive isle, the proposed project has also planned several parking spaces that could be used for car-share parking.
30	Shuttle Program	If not proximate to transit hubs or lines, connect to transit via shuttle service as requested by the City.	**Consistent.** The project site is adjacent to the El Camino Real corridor, which is a high-quality transit corridor as the SamTrans ECR bus route provides bus transit service along the El Camino Real corridor arrives every 15 minutes during weekdays. Therefore, shuttle service would not be required.
32	EV Charging Infrastructure in New Construction	Adopt Reach Code to update the residential and commercial building code to increase the mandated percentage of parking spaces designed to accommodate electric vehicle charging equipment and also increase the mandated percentage of parking spaces devoted to clean air vehicles (Evs, PHEVs, carpools)	**Consistent.** The proposed apartment complex would equip 17 parking spaces with charging stations for electric vehicles. The future hotel would be subject to the City's applicable requirements at the time of the development entitlement application.
33	Shared Electric Bikes and Scooters	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.** As requested by the City, the proposed project would widen the existing public sidewalk and design several public use areas along the new Entry Drive and Center Street that could accommodate shared bikes and scooters.
37	Landfill Diversion Rate Goal	Increase participation in recycling programs and weekly collection of recyclables and organic waste to achieve 85% diversion.	**Consistent.** The proposed project would include onsite recycling, which would comply with federal, state, and local statutes, including the City's Recycling and Waste Prevention Program.

Number	Measure	Description	Project Consistency
38	Sustainable Food Service Ware	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.** The proposed project would comply with all local ordinances.
39	Commercial Organics Recycling Ordinance	AB 1826 requires all businesses and multi-family complexes with more than five units to sort and recycle organic material. Provide enforcement to ensure compliance with ordinance	**Consistent.** The proposed project would provide recycling and green waste services as required by state and local objectives to reduce solid waste.
43	Commercial & Municipal Green Business Program	Strive to be a certified Bay Area Green Business and implement respective sustainable practices.	**Consistent.** The future hotel would review the respective sustainable practices that are applicable during at that time.

Notes:
All 43 measures contained in the City's 2020 CAP were reviewed as part of this analysis. The table presents the 28 measures that would apply to the proposed project.

Per the policy consistency analysis above, the proposed project would be consistent with all applicable measures listed in the City's 2020 CAP. Therefore, the proposed project would not impede the City's ability to achieve its GHG reduction goals. The proposed project would have a less-than-significant impact on the environment from GHG emissions.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact GHG-2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Analysis

As discussed under Impact GHG-1 and shown in Table 4.7-2, the proposed project would be consistent with all applicable measures from the City's 2020 CAP. The City's goal with the 2020 CAP is to reduce GHG emissions 32 percent by 2025 and 49 percent by 2030, which aligns with the SB 32 goal of reducing GHG emissions 40 percent below 1990 levels. The 2020 CAP will also help the City meet or exceed California's 2045 carbon neutrality goal (EO B-55-18). Because the proposed project would be consistent with all applicable 2020 CAP measures, it would not conflict with implementation of the 2020 CAP or impede attainment of the City's climate change goals.

The proposed project would be consistent with Plan Bay Area. The primary objective of the Plan is to achieve mandated reductions of GHG emissions and provide adequate housing for the projected

2050 regional population level pursuant to SB 375. SB 375 outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California's GHG emissions reduction mandates. The Plan Bay Area outlines strategies to meet or exceed the targets set by CARB. By Executive Order, approved June 25, 2018, CARB officially determined that the Plan Bay Area would, if implemented, meet CARB's 2020 and 2035 GHG emission reduction targets (CARB 2017).

At the state level, CARB adopted the 2017 Scoping Plan as a framework for achieving SB 32. The Scoping Plan outlines a series of technologically feasible and cost-effective measures to reduce statewide GHG emissions. Table 4.7-2 identifies how the proposed project would be consistent with 2017 Scoping Plan measures.

Table 4.7-2. Consistency with SB 32 2017 Scoping Plan Update

Scoping Plan Measure	Project Consistency
SB 350 50 Percent Renewable Mandate. Utilities subject to the legislation will be required to increase their renewable energy mix from 33 percent in 2020 to 50 percent in 2030.	**Consistent.** The proposed project would purchase electricity from a utility subject to the SB 350 Renewable Mandate.
SB 350 Double Building Energy Efficiency by 2030. This is equivalent to a 20 percent reduction from 2014 building energy usage compared to current projected 2030 levels	**Not Applicable.** This measure applies to existing buildings. New structures are required to comply with Title 24 Energy Efficiency Standards that are expected to increase in stringency until residential housing and commercial development achieves zero net energy.
Low Carbon Fuel Standard. This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.	**Consistent.** Vehicles accessing the project site would use fuel containing lower carbon content as the fuel standard is implemented by the State over time.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario). Vehicle manufacturers will be required to meet existing regulations mandated by the Low-Emission Vehicle III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million ZEVs on the road by 2030 and increasing numbers of ZEV trucks and buses.	**Consistent.** Future residents can be expected to purchase increasing numbers of more fuel efficient and zero emission cars and trucks each year. The 2019 CALGREEN Code requires electrical service in multi-family dwellings as well as non-residential developments with ten or more parking spaces to be electric vehicle charger ready. Home deliveries would be made by increasing numbers of ZEV delivery trucks.
Sustainable Freight Action Plan. The plan's target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying more than 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero-emission freight vehicles and equipment powered by renewable energy by 2030.	**Not Applicable.** The measure applies to owners and operators of trucks and freight operations. However, home hotel deliveries are expected to be made by increasing number of ZEV delivery trucks.

Scoping Plan Measure	Project Consistency
Short-Lived Climate Pollutant Reduction Strategy. The strategy requires the reduction of short-lived climate pollutants by 40 percent from 2013 levels by 2030 and the reduction of black carbon by 50 percent from 2013 levels by 2030.	**Consistent.** The proposed project would include only natural gas hearths that produce very little black carbon compared to wood burning fireplaces and heaters.
Senate Bill 375 Sustainable Communities Strategies. Requires Regional Transportation Plans to include a sustainable communities strategy for reduction of per capita vehicle miles traveled.	**Consistent.** The proposed project would provide housing in the region that is consistent with the growth projections in the 2014 Regional Transportation Plan/Sustainable Communities Strategy. The proposed project is within a transit priority area and is subject to requirements applicable to those areas.
Post-2020 Cap-and-Trade Program. The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.	**Consistent.** The post-2020 Cap-and-Trade Program indirectly affects people who use the products and services produced by the regulated industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers. The Cap-and-Trade Program covers the greenhouse gas emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, greenhouse gas emissions associated with CEQA projects' electricity usage are covered by the Cap- and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the program's first compliance period.
Natural and Working Lands Action Plan. The California Air Resources Board is working in coordination with several other agencies at the federal, state, and local levels; stakeholders; and the public to develop measures as outlined in the Scoping Plan Update and the governor's Executive Order B-30-15 to reduce greenhouse gas emissions and to cultivate net carbon sequestration potential for California's natural and working land.	**Not Applicable.** The proposed project is a residential and commercial development and would not be considered natural or working lands.

Notes:
CALGREEN = California Green Building Standards; CEQA = California Environmental Quality Act; ZEV = zero-emission vehicle
Source: CARB 2017b

The 2017 Scoping Plan would achieve the bulk of required GHG reductions from electric power, industrial fuel combustion, and transportation. Cap-and-trade would provide between 10 and 20 percent of the required reductions depending on the amounts achieved by the other reduction measures. Although the 2017 Scoping Plan focuses on state agency actions necessary to achieve the 2030 GHG limit, CARB considers local governments essential partners in achieving California's goals to reduce GHG emissions. The 2030 target would require an increase in the rate of emission reductions compared to what was needed to achieve the 2020 limit, and this would require action

and collaboration at all levels, including local government action to complement and support state-level actions. The 2017 Scoping Plan specifically recommends preparation of local CAPs and project-level conformance to those plans (California Air Resources Board 2017).

Per the policy consistency analysis above, the proposed project would not conflict with any applicable plans, policies, or regulations adopted for the purposes of reducing GHG emissions, and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

4.8 Hazards and Hazardous Materials

	Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
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 which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e)	For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
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?	☐	☐	☐	☒

4.8.1 Environmental Setting

Hazardous materials, as defined by the CCR, are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed of, or otherwise managed. 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

Hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. The criteria that define a material as hazardous also define a waste as hazardous. 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 Government Code, Title 22, Sections 66261.20–24 contains technical descriptions of toxic characteristics that could cause soil or groundwater to be classified as hazardous waste.

California Government Code, Section 65962.5 requires the California Environmental Protection Agency to compile, maintain, and update specified lists of hazardous material release sites. CEQA (PRC Section 21092.6) requires the lead agency to consult the lists compiled pursuant to California Government Code, Section 65962.5 to determine whether the project and any alternatives are identified on a federal or state listing database. The required lists of hazardous material release sites are commonly referred to as the "Cortese List," after the State Assembly member who sponsored the legislation. Since the statute was enacted more than 20 years ago, some of the provisions refer to agency activities that were conducted many years ago and are no longer being implemented, and in some cases, the information required in the Cortese List does not exist. Those requesting a copy of the Cortese List are now referred directly to the appropriate information resources contained on internet websites hosted by the boards or departments referenced in the statute, including the online EnviroStor database from the Department of Toxic Substances Control (DTSC) and the online GeoTracker database offered by SWRCB. These two databases include hazardous material release sites, along with other categories of sites or facilities specific to each agency's jurisdiction. A search of EnviroStor and GeoTracker databases in December 2019 revealed there is record of leaking underground storage tank (LUST) site associated with the El Rancho Inn within the project site (SWRCB 2019). However, this site has a listed cleanup status of case closed as of February 29, 2000 (SWRCB 2019). There are no listed hazardous sites within the project site on the EnviroStor database (DTSC 2019).

A Phase I Environmental Site Assessment (ESA) was completed for the project site on October 14, 2016, by AEI Consultants (AEI Consultants 2016, Appendix H). This Phase I ESA did not identify any recognized environmental conditions or controlled recognized environmental conditions within the project site during the investigation (AEI Consultants 2016). However, due to the age of the buildings located onsite, there is the potential for the presence of lead-based paint and asbestos containing materials to be present in the existing buildings (AEI Consultants 2016).

The Phase I ESA also considered the potential for radon, lead in drinking water, and mold to occur at the project site. The Phase I ESA found that radon levels at the project site were below the action level set forth by USEPA. It also determined that lead levels in drinking water at the project site were within the standards established by USEPA (AEI Consultants 2016). AEI Consultants conducted a limited assessment for the interior areas of the existing buildings and did not identify the presence of mold. As AEI Consultants conducted a limited assessment for mold, the Phase I ESA states that additional areas of mold not observed, such as pipe chases, HVAC systems, and behind enclosed walls and ceilings, may be present. However, the Phase I ESA determined that no further action related to radon, lead in drinking water, or mold was required (AEI Consultants 2016).

The project site is about 0.25 mile southwest of SFO. The Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (CALUCP) defines safety and noise hazard areas around the airport (City/County Association of San Mateo County 2012). The CALUCP contains policies and criteria to address four issues: (a) aircraft noise impacts; (b) safety compatibility criteria; (c) height of structures/airspace protection; and (d) overflight notification.

The project site is not located in the Outer Boundary of the Safety Zone or the Noise Contour Zone for SFO's Airport Influence Area. However, the project site is located within Area B of SFO's Airport Influence Area, an area based on a combination of the outer boundaries of the noise compatibility and safety zones and other considerations. California Government Code Section 65302.3 states that a local agency General Plan, Zoning Ordinance and/or any affected specific plan must be consistent with the applicable airport/land use criteria in the relevant adopted CALUCP. Additionally, per CALUCP Policy GP-10.1, since the City of Millbrae has not amended its General Plan and Zoning Code to reflect the policies and requirements of the current CALUCP, all proposed development projects within Airport Influence Area (AIA) B are subject to CALUC review. In accordance with these requirements, the City of Millbrae has referred the subject development project to C/CAG, acting as the San Mateo County Airport Land Use Commission, for a determination of consistency with the CALUCP. Additionally, the CALUCP contains height restrictions for areas that are critical aeronautical surfaces. Based on analysis by the CALUC, utilizing the 'SFO Online Airspace Tool", the building would be more than 82 feet below critical airspace. The project is located in an area that requires FAA notification for projects of any height. The project site is located within the AIA of SFO, the real estate disclosure area. Pursuant to Policy IP-1, notification is required, prior to sale or lease of property located within the AIA, of the proximity of the airport and that therefore the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations. (City/County Association of San Mateo County)

At its October 28, 2021 meeting, the Airport Land Use Committee unanimously recommended that the C/CAG Board of Directors, acting as the Airport Land Use Commission, determine that the project was consistent with the SFO ALUCP, subject to the following conditions:

- Prior to issuance of a building permit, the project sponsor shall file Form 7460-1 with the FAA and provide to the City of Millbrae an FAA "Determination of No Hazard".
- The City of Millbrae shall require that the project sponsor comply with the real estate disclosure requirements outlined in Policy IP-1 of the SFO CALUCP, which apply to sale or lease of property located within the AIA.

On November 18, 2021, the Board of Directors of the C/CAG, acting as the San Mateo County CALUC pursuant to its authority under Section 21670, adopted Resolution No. 21-82 determining that the project is conditionally consistent with the CALUCP.

According to the California Department of Forestry and Fire Protection (CAL FIRE), the City is not located in or adjacent to a local or state fire hazard severity zone (CAL FIRE 2008). The schools nearest the project site are the Millbrae Nursery School (approximately 70 feet north of the project site), the Saint Dunstan School (approximately 400 feet west of the project site), and the Lomita Park Elementary School (approximately 0.22 mile north of the project site).

4.8.2 Previous Environmental Analysis

4.8.2.1 City of Millbrae General Plan EIR Summary

Chapter 4.9 of the General Plan EIR discusses impacts related to hazardous materials, emergency response, and aircraft hazards. The General Plan EIR identified potentially significant impacts related to hazards and hazardous materials. However, compliance with existing federal, state, and local laws, as well as policies contained in the General Plan would reduce potential impacts to less-than-significant levels (City of Millbrae 1998b).

The following General Plan policies are applicable to the proposed project:

Policy S1.1: **Location of Future Development.** Permit development only in those areas where potential danger to the health, safety, and welfare of the residents of the community can be adequately mitigated, including development which would be subject to severe flood damage or geologic hazard due to its location and/or design. Development also should be prohibited where emergency services, including fire protection, cannot be provided.

Policy S1.20 **Airport Safety.** Regulate land uses in the vicinity of San Francisco International Airport to assure safety of aircraft and of persons and property near the Airport. Limit building height easterly of El Camino Real consistent with the Millbrae Station Area Specific Plan.

Policy S2.6 **Access for Emergency Vehicles**. Provide adequate access for emergency vehicles and equipment, including providing a second means of ingress and egress in all development. Do not permit new cul-de-sacs in excess of 500 feet in length, unless there is secondary emergency access approved by the Fire Chief.

4.8.2.2 Plan Bay Area EIR Summary

The following summarizes the potential impacts related to hazards and hazardous materials discussed in Chapter 3.9 of the Plan Bay Area EIR and includes the complete text of mitigation measures previously identified by the Plan Bay Area EIR that are applicable to the proposed project.

Impact HAZ-1: Routine Transport or Disposal of Hazardous Materials. The Plan Bay Area EIR determined that future land use and transportation projects could increase the routine transport, use, storage, and disposal of hazardous wastes in the region. However, compliance with existing federal, state, and local regulations and oversight would effectively reduce potential impacts to a less-than-significant level. No mitigation measures were identified.

Impact HAZ-2: Accidental Release of Hazardous Materials into the Environment. The Plan Bay Area EIR determined that future land use and transportation projects could increase the potential for unintentional upset and accident conditions. However, compliance with existing federal, state, and local regulations and oversight would effectively reduce potential impacts to a less-than-significant level. No mitigation measures were identified.

Impact HAZ-3: Emit or Handle Hazardous Materials Near Schools. The Plan Bay Area EIR determined that all projects would comply with federal and state regulations that are designed to reduce the potential for the release of large quantities of hazardous materials and wastes into the environment to an acceptable level, and in particular to protect schools. Therefore, impacts would be less than significant. No mitigation measures were identified.

Impact HAZ-4: Hazardous Materials List Pursuant to California Government Code, Section 65962.5. The Plan Bay Area EIR determined that the potential for encountering hazardous materials or wastes would be dependent on site-specific conditions. However, implementation of Mitigation Measure HAZ-4 would reduce impacts to a less-than-significant level. The Plan Bay Area EIR identified Mitigation Measure HAZ-4 to reduce impacts related to active hazardous material sites to a less-than-significant level by requiring implementing agencies and/or project sponsors to require a Phase I ESA, and if necessary, a Phase II ESA be completed and implemented.

PBA EIR MM HAZ-4: Implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

- The project proponent shall perform a records review to determine whether there is existing permitted use of hazardous materials or documented evidence of hazardous waste contamination on the project site and provide the results of this investigation to the implementing agency.
- For any project located on or near a hazardous materials and/or waste site pursuant to Government Code Section 65962.5 or sites that have the potential for residual hazardous materials as a result of historic land uses, project proponents shall prepare a Phase I ESA in accordance with the American Society for Testing and Materials' E-1527-05 standard.
- For any project located on or near sites that are not listed and do not have the potential for residual hazardous materials as a result of historic land uses, no action is required unless unknown hazards are discovered during development. In that case, the implementing agency shall discontinue development until DTSC, RWQCB, the local air district, and/or other responsible agency issues a determination, which would likely require a Phase I ESA as part of the assessment.
- The project proponent shall develop and implement worker awareness and protective measures to minimize worker and public exposure to an acceptable level of contamination and prevent environmental contamination as a result of construction.
- Projects preparing a Phase I ESA, where required, shall fully implement the recommendations contained in the report. If a Phase I ESA indicates the presence or likely presence of contamination, the project proponent shall prepare a Phase II ESA, and recommendations of the Phase II ESA shall be fully implemented.
- The project proponent shall consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits, and sumps.

A Phase I ESA has already been completed for the project site (refer to Impact HAZ-4 in Section 4.8.3, Project-Specific Analysis).

Impact HAZ-5: Airport Land Use Plan or Vicinity of a Private Airstrip. The Plan Bay Area EIR analyzed the potential impacts related to the safety hazard for people residing or working within 2 miles of a public airport or in the vicinity of private airstrip. The Plan Bay Area EIR determined that compliance with existing federal, state, and local regulations would reduce potential impacts to a less-than-significant level, and no mitigation measures were identified.

Impact HAZ-6: Emergency Response or Evacuation Plan. The Plan Bay Area EIR analyzed the potential impacts related to interference with emergency response and evacuation plans and determined that the impact would be less than significant with implementation of Mitigation Measure HAZ-6. Mitigation Measure HAZ-6 is not applicable to the proposed project because it would not impair implementation of or physically interfere with any emergency response or evacuation plan (refer to Impact HAZ-6 in Section 4.8.3, Project-Specific Analysis).

Impact HAZ-7: Wildland Fires. The Plan Bay Area EIR analyzed the potential impacts related to wildland fires and determined that the impact would be significant and unavoidable even with implementation of Mitigation Measure HAZ-7. Mitigation Measure HAZ-7 is not applicable to the proposed project because it is not located in a state responsibility area or a very high fire hazard severity zone (refer to Impact HAZ-7 in Section 4.8.3, Project-Specific Analysis).

4.8.3 Project-Specific Analysis

Impact HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

AND

Impact HAZ-2: 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?

Impact Analysis

Construction

The proposed project would involve demolition of existing structures and construction of a new five-story apartment complex with parking garage, and a seven-story hotel with parking garage. Construction of the proposed project would primarily be limited to above-ground improvements. During construction, small quantities of potentially toxic substances (e.g., petroleum and other chemicals used to operate and maintain construction equipment) would be used and transported to and from the site as needed. Accidental releases of small quantities of these substances could contaminate soils and degrade the quality of surface water and groundwater, resulting in a public safety hazard; however, contractors would be required to transport, store, and handle hazardous materials required for construction in a manner consistent with relevant regulations and guidelines, including California Health and Safety Codes and City ordinances. Regulatory requirements for the transport of hazardous wastes in California are specified in Title 22 of the California Code of Regulations, Division 4.5, Chapters 13 and 29. In accordance with these regulations, transport of hazardous materials must comply with the California Vehicle Code, California Highway Patrol regulations (contained in Title 13 of the California Code of Regulations); the California State Fire Marshal regulations (contained in Title 19 of the California Code of Regulations); United States Department of Transportation regulations (Title 49 of the Code of Federal Regulations); and USEPA regulations (contained in Title 40 of the Code of Federal Regulations). The use of hazardous materials is regulated by DTSC (Title 22, Division 4.5 of the California Code of Regulations). By law, the proposed project would be required to comply with existing hazardous material regulations. Therefore, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

A search of EnviroStor and GeoTracker databases in December 2019 revealed there is record of a LUST site associated with the El Rancho Inn within the project site (SWRCB 2019). However, this site has a listed cleanup status of case closed as of February 29, 2000; therefore, it would not result in the release of any hazardous materials (SWRCB 2019). The Phase I ESA that was completed for the project site confirmed this.

However, the Phase I ESA found that, due to the age of the buildings located onsite, there is the potential presence of lead-based paint and asbestos-containing materials in these buildings (AEI Consultants 2016). Demolition of the existing buildings on the project site could result in a potentially significant impact related to the release of lead-based paint and asbestos containing materials. Federal regulations and regulations adopted by BAAQMD apply to the identification and treatment of hazardous materials during demolition and construction activities. Failure to comply with the regulations respecting asbestos and dust control may result in a Notice of Violation being issued by BAAQMD, civil penalties under state and/or federal law, and possible action by USEPA under federal law. Federal law covers a number of different activities involving asbestos, including demolition and renovation of structures (40 CFR Section 61.145). In addition, the proposed project would implement Mitigation Measure HAZ-1, which would require the removal and disposal of lead-based paint, lead containing paint, and asbestos containing materials prior to demolition activities. The removal of these hazardous materials is required to comply with the requirements of the Occupational Safety and Health Administration lead standard (29 CCR 1910.1025 and 1926.62) and USEPA National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61), respectively.

The Phase I ESA also considered the potential for radon, lead in drinking water, and mold to occur at the project site. As discussed in Section 4.8.1, Environmental Setting, radon levels at the project site were below the action level set forth by USEPA. It also determined lead levels in drinking water were within the standards established by USEPA (AEI Consultants 2016). AEI Consultants conducted a limited assessment for the interior areas of the existing buildings and did not identify the presence of mold. As AEI Consultants conducted a limited assessment for mold, additional areas of mold not observed, such as pipe chases, HVAC systems, and behind enclosed walls and ceilings, may be present. However, the Phase I ESA determined that no further action related to radon, lead in drinking water, or mold at the project site was required (AEI Consultants 2016).

Therefore, with implementation of Mitigation Measure HAZ-1 construction of the proposed project would not create a significant hazard to the public or future residents and this impact would be less than significant.

Operation

Residential and hotel uses are not typically associated with the routine transport, use, or disposal of hazardous materials and do not present a reasonably foreseeable release of hazardous materials. Any hazardous materials associated with the residential uses would primarily consist of typical household cleaning products and fertilizers. These items would be used in small quantities and in accordance with label instructions, which are based on federal and/or state health and safety regulations. Therefore, operation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through the release of hazardous materials through reasonably foreseeable upset and accident conditions. Impacts would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure HAZ-1 (Removal of Asbestos and Lead Based Paint) is required.

MM HAZ-1: Removal of Asbestos and Lead Based Paint. Prior to demolition activities of any structures located on the project site, the applicant shall retain a certified hazardous waste contractor to identify the presence of asbestos containing building materials and lead-based paint in existing structures. If such substances are found to be present, the contractor shall properly remove and dispose of them in accordance with federal and state law. All removal activities shall be completed prior to commencement of demolition activities. Following completion of removal activities, the applicant shall submit documentation to the City of Millbrae verifying that all hazardous materials have been properly removed and disposed.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact Analysis

The nearest schools to the project site are the Millbrae Nursery School (located approximately 70 feet north of the project site), the Saint Dunstan School (located approximately 400 feet west of the project site), and the Lomita Park Elementary School (located approximately 0.22 mile north of the project site). As explained in Impacts HAZ-1 and HAZ-2, the proposed project would not involve the use of significant quantities of hazardous materials. However, demolition of the existing buildings on the project site could result in a potentially significant impact related to the release of lead-based paint, lead-containing paint, and asbestos-containing materials. As discussed in Impact AIR-1, construction of the proposed project also has the potential to result in emissions of TAC/ hazardous air pollutants in the form of DPM emissions from the operation of diesel-fueled internal combustion engines. Other potentially hazardous materials present within soils could be disturbed during construction activities and could become airborne and adversely affect nearby schools. Prior to demolition activities, the proposed project would be required to implement Mitigation Measure HAZ-1 and remove and dispose of lead-based paint, lead-containing paint, and asbestos-containing materials from the existing buildings. Additionally, the proposed project would be required to implement Mitigation Measure AIR-1 (PBA EIR MM AQ-2) during construction to reduce construction-related dust and the potential for hazardous airborne pollutants to be released. Mitigation Measure AIR-1 (PBA EIR MM AQ-2) would include specific instruction for handling construction equipment, such as limiting idling times, which would limit the amount of TACs released into the air near schools within 0.25-mile. Other emission reducing requirements would be included in Mitigation Measure AIR-1 (PBA EIR MM AQ-2), which would require the use of late model engines, low-emission diesel products, alternative fuels, and other options as they become available.

Hazardous materials used during construction would be typical of common construction activities and are discussed in Impacts HAZ-1 and HAZ-2 above. They would be handled by the contractor in accordance with applicable federal, state, and local regulations for hazardous substances. Additionally, California PRC Section 21151.4 requires that projects located within 0.25-mile of a school that might reasonably be anticipated to emit hazardous air emissions, or that would handle an extremely hazardous substance or a mixture containing extremely hazardous substances in a quantity equal to or greater than the state threshold quantity specified pursuant to subdivision (j) of Section 25532 of the Health and Safety Code would either need to consult with the school or give

written notification to the school. The applicant would comply with California PRC Section 21151.4 and would notify the appropriate personnel at Millbrae Nursery School, Saint Dunstan School, and Lomita Park Elementary School if construction activities would require work with hazardous materials or emissions within 0.25-mile of a school.

Therefore, the impacts related to hazardous emissions within 0.25-mile of the nearby schools would be less than significant with the implementation of Mitigation Measures HAZ-1 and AIR-1 (PBA EIR MM AQ-2).

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure HAZ-1 (Removal of Asbestos and Lead Based Paint**)** and Mitigation Measure AIR-1 (PBA EIR MM AQ-2: Construction Best Practices) are required.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact HAZ-4: Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact Analysis

As discussed in Section 4.8.1, Environmental Setting, the project site is not located on any active hazardous cleanup sites, pursuant to California Government Code, Section 65962.5 (DTSC 2019, SWRCB 2019). Therefore, the proposed project would not be located on a hazardous materials site that would create a significant hazard to the public and the environment, and no impact would occur.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

Impact HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Impact Analysis

The project site is about 0.25 mile southwest of SFO. The project site is not located in the Outer Boundary of the Safety Zone or the in the Noise Contour Zone for SFO's AIA as designated in the CALUCP (City/County Association of San Mateo County 2012).

The project site is located within Area B of SFO's Airport Influence Area, an area based on a combination of the outer boundaries of the noise compatibility and safety zones and other considerations (City/County Association of San Mateo County 2012). California Government Code Section 65302.3 states that a local agency General Plan, Zoning Ordinance and/or any affected specific plan must be consistent with the applicable airport/land use criteria in the relevant adopted CALUCP. Additionally, per CALUCP Policy GP-10.1, since the City of Millbrae has not amended its General Plan and Zoning Code to reflect the policies and requirements of the current CALUCP, all proposed development projects within AIA B are subject to ALUC review. In accordance with these requirements, the City of Millbrae has referred the subject development project to C/CAG, acting as the San Mateo County Airport Land Use Commission, for a determination of consistency with the CALUCP. Additionally, the CALUCP contains height restrictions for areas that are critical aeronautical surfaces. Based on analysis by the CALUC, utilizing the 'SFO Online Airspace Tool", the building would be more than 82 feet below critical airspace. The project is located in an area that requires FAA notification for projects of any height. The project site is located within the AIA of SFO, the real estate disclosure area. Pursuant to Policy IP-1, notification is required, prior to sale or lease of property located within the AIA, of the proximity of the airport and that therefore the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations. (City/County Association of San Mateo County 2012).

At its October 28, 2021 meeting, the Airport Land Use Committee unanimously recommended that the C/CAG Board of Directors, acting as the Airport Land Use Commission, determine that the project was consistent with the SFO ALUCP, subject to the following conditions:

- Prior to issuance of a building permit, the project sponsor shall file Form 7460-1 with the FAA and provide to the City of Millbrae an FAA "Determination of No Hazard".
- The City of Millbrae shall require that the project sponsor comply with the real estate disclosure requirements outlined in Policy IP-1 of the SFO CALUCP, which apply to sale or lease of property located within the AIA.

On November 18, 2021, the Board of Directors of the C/CAG, acting as the San Mateo County CALUC pursuant to its authority under Section 21670, adopted Resolution No. 21-82 determining that the project is conditionally consistent with the CALUCP.

The CALUCP also contains height restrictions for areas that are critical aeronautical surface (City/County Association of San Mateo County 2012). As proposed, the 5-story structure would be 63-feet and 5inches tall to the top of the rooftop stairwells. With a ground elevation of approximately 16.4 feet above mean sea level (MSL), the height of the project would therefore be about 80 feet above MSL., Utilizing the 'SFO Online Airspace Tool", the residential building would be more than 82 feet below critical airspace. The future hotel would have a maximum height of 85 feet

and would also be below the critical airspace. Therefore, the proposed structures would be consistent with the height restriction established by the CALUCP. In addition, the proposed structures would not require further review pursuant to Federal Aviation Regulation Part 77 because these structures, with a maximum height of 85 feet, would be less than 200 feet tall.

Accordingly, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area, and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact Analysis

The proposed project would not alter the existing street system besides minor improvements to the streets within the existing area, and the limited construction activities associated with the project improvements would not result in temporary blockage of any roadways. As a result, the proposed project would not impair implementation of or physically interfere with any emergency response or evacuation plan, and a less-than-significant impact would occur.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact HAZ-7: Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Impact Analysis

The primary threat related to wildland fire is open grasslands abutting residential developments. The project site is surrounded by urban development on all sides with predominantly impervious surfaces and is not located near any open grassland. Furthermore, the project site is not located in a state responsibility area, or a very high fire hazard severity zone (CAL FIRE 2008). With

implementation of the proposed project, the site would remain a developed area constructed with predominantly impervious surfaces. Additionally, the proposed project would be required to comply with all applicable fire safety standards set forth by the City; therefore, the proposed project would have no impact with respect to exposing people or structures to the risk of loss, injury, or death involving wildland fires.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

4.9 Hydrology and Water Quality

Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that 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:				
i) Result in substantial erosion or siltation on- or off-site;	☐	☒	☐	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☒	☐	☐
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff	☐	☒	☐	☐
iv) 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?	☐	☒	☐	☐

4.9.1 Environmental Setting

4.9.1.1 Regional and Local Drainage

The project site is in the San Francisco Bay Hydrologic Region, specifically in the San Mateo Creek-Frontal San Francisco Bay Estuaries which is about 343 square kilometers (CWIP 2021). The closest bodies of water to the project site include San Andreas Lake, about 1.5 miles to the west, and the San Francisco Bay, about 2 miles to the east. Drainage patterns in the City generally flow east/southeast from the hillsides into the flatter portions of the City and, ultimately, out to the San Francisco Bay (City of Millbrae 2018).

4.9.1.2 Groundwater Resources

The City solely relies on surface water supplied by the SFPUC to serve its residents and does not supplement this supply with groundwater. In the mid-1990s, the City investigated drilling municipal groundwater wells as a supplemental water source but found no potential source of groundwater within the City's boundaries. Groundwater is not available or considered in the City's near-term water supply planning (City of Millbrae 2021). During the geotechnical exploration, groundwater was encountered in the northeast portion of the project site at approximately 12 feet bgs, but according to data available from SWRCB, groundwater in the vicinity of the project site has been encountered as shallow as 5 feet bgs. Therefore, for design purposes, the geotechnical study assumed a groundwater level of 5 feet bgs at the project site (ENGEO 2020).

The City is in the South Westside Groundwater Basin, which is classified as a very-low priority basin by the California Department of Water Resources under the Sustainable Groundwater Management Act (DWR 2018). The Sustainable Groundwater Management Act requires governments and agencies of high and medium priority basins to develop and implement Groundwater Sustainability Plans or Alternatives to Groundwater Sustainability Plans. Local public agencies in basins designated as low or very-low priority are not subject to the Sustainable Groundwater Management Act (DWR 2020).

4.9.1.3 Stormwater

Municipalities are required to proactively control and regulate pollution from their municipal storm sewer systems to minimize the potential detrimental impacts of urban runoff. The project site is served by the City's storm drain system and has approximately 255,286 square feet of impervious surface and approximately 38,520 square feet of pervious surface. The project site is relatively flat and generally dips to the east from El Camino Real with the site elevation ranging from about 30 to 15 feet. Existing stormwater on the site primarily runs west to east and is conveyed to the storm drain system in Center Street, which flows into Lomita Creek and the Lomita Canal (City of Millbrae 2018). Lomita Creek and the Lomita Canal are not listed as impaired streams as defined by Section 303(d) of the Clean Water Act. However, water is ultimately discharged to the Lower San Francisco Bay which is on the 303(d) impaired water bodies list for chlordane, dichlorodiphenyltrichloroethane, dieldrin, dioxin compounds, furan compounds, invasive species, mercury, polychlorinated biphenyl and trash (SWRCB 2021).

The City is under the jurisdiction of the San Francisco Bay RWQCB and subject to the Waste Discharge Requirements of the MRP. Implementation of the MRP is locally regulated by the San Mateo Countywide Water Pollution Prevention Program, a partnership of the City/County Association of Governments, each incorporated city and town in the county, and the County of San Mateo (SMCWPPP 2015). This partnership relies on each of the municipalities to implement local stormwater pollution prevention and control activities for its own local storm drain systems. Under Provision C.3 of the MRP, the City is required to include appropriate source control, site design, and stormwater treatment measures in new development and redevelopment projects. As such, the City's Stormwater Management and Discharge Control Ordinance, specified in Chapter 27A of the Millbrae Municipal Code includes BMPs for new redevelopment and development projects in accordance with the MRP and SMCWPPP C.3 provisions.

4.9.1.4 Flooding, Seiche, and Tsunami

Flood hazard zones are identified on official Flood Insurance Rate Maps issued by the Federal Emergency Management Agency (FEMA). According to Flood Insurance Rate Map No. 06081C0132F, the project site is designated Zone X and not within a 100-year floodplain zone. However, areas directly north of the project site are designated Zone AH and have a 1 percent annual chance of shallow flooding usually in the form of a pond (FEMA 2019).

The project site is primarily developed with the El Rancho Inn and surface parking. Due to the amount of impervious surface area, stormwater currently flows north from the surface parking area toward Center Street, which potentially contributes to localized flooding in the area. The proposed project would increase the amount of onsite landscaping and bioretention areas, thereby reducing off-site stormwater runoff toward Center Street. Tsunamis are tidal waves created by undersea fault movement. These waves are fast moving, create large swells of water, and upon reaching the coast, can sweep inland with a large amount of force. The project site is about 2 miles west of the San Francisco Bay and is not mapped in a Tsunami Inundation Area by the California Department of Conservation (DOC 2020).

Seiches are waves that oscillate in enclosed water bodies, such as reservoirs, lakes, ponds, swimming pools, or semi enclosed bodies of water, including the San Francisco Bay and San Andreas Lake. The project site is located about 1.5 miles east of San Andreas Lake. Any potential flooding from San Andreas Lake would not reach the project site because the predominant flow direction would be to the southeast and away from the project site. The project site is not mapped in a Tsunami Inundation Area; therefore, it would not be subject to seiche (DOC 2020).

4.9.2 Previous Environmental Analysis

4.9.2.1 City of Millbrae General Plan EIR Summary

Chapter 4.11 of the General Plan EIR discusses potential impacts related to hydrology and water quality. The General Plan EIR determined that construction activities and post-construction uses in the City could result in degradation of water quality in nearby surface water bodies by reducing the quality of stormwater runoff. The General Plan EIR also determined that new development in the City would not be expected to significantly change the amount of area covered by impervious surfaces and potentially cause flooding because the City is essentially urbanized under existing conditions. As such, the General Plan EIR determined that impacts related to hydrology and water quality would be less than significant when a project maintains compliance with existing regulations and General Plan policies (City of Millbrae 1998b).

The following General Plan policies are applicable to the proposed project:

Policy S1.16: **Erosion/Sediment Control.** Provide appropriate erosion and sediment control measures in conjunction with proposed development in areas susceptible to erosion and regularly maintain all creekbeds and conduits to minimize problems stemming from their erosion.

Policy S1.18: **Flood Hazards.** Assure existing and new structures are designed to protect people and property from the threat of potential flooding. New development shall be designed to provide protection from potential impacts of flooding during the "1 percent chance" or "100-year" flood.

Policy PC 6.8 **Water Quality Strategies.** Implement habitat protection programs and evaluate proposed projects for potential water quality impacts, which may require sediment basins as part of grading activities, grease/oil traps where concentrations of such pollutants are anticipated, or other measures.

Policy PC 6.9 **Water Quality.** Maintain, at a minimum, the water quality levels established by the U.S. Environmental Protection Agency (EPA) and achieve the highest possible level of water quality reasonable for an urban environment.

Policy PC 6.12 **Water Saving Landscaping and Irrigation.** Promote the use of low-water-use landscaping and irrigation devices in parks and require such devices of new projects during review of new projects and modifications to existing developments.

4.9.2.2 Plan Bay Area EIR Summary

Chapter 3.10 of the Plan Bay Area EIR discusses potential impacts on water resources. The Plan Bay Area EIR determined that future land use and development projects could adversely affect water quality, groundwater recharge, and drainage patterns, and could expose people to a significant risk of loss, injury, or death from flooding, seiche, or tsunami. However, compliance with existing federal, state, and local regulations would ensure that impacts are less than significant. No mitigation measures were identified (MTC/ABAG 2021).

4.9.3 Project-Specific Analysis

Impact HYD-1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Impact Analysis

Construction

Project construction would involve demolition of existing structures, removal of onsite vegetation and impervious surfaces, grading, utility connections, building construction, frontage improvements (e.g., new curb, gutter, sidewalk, and driveway construction), and landscaping on the project site. The proposed project would grade the entire project site and permanently disturb approximately 6.7 acres. Construction activities have the potential to discharge pollutants into stormwater runoff and the storm drain system. If not controlled, the transport of these materials into local waterways could temporarily increase suspended sediment concentrations. Construction activities and refueling and parking of construction equipment onsite could also result in the degradation of water quality if sediment, oil and greases, solvents, paints, and other chemicals were released into nearby water bodies or the storm drain system. To minimize these potential impacts, projects that disturb more than 1 acre are required to obtain coverage under the NPDES General Construction Permit and prepare a SWPPP. The SWPPP would identify BMPs to control sedimentation, erosion, and hazardous materials from degrading water quality, with the intent of minimizing erosion and offsite movement of sediment into receiving waters. The requirements of the SWPPP and applicable BMPs would be incorporated into the proposed project as Mitigation Measure HYD-1 to reduce potential water quality impacts to a less-than-significant level.

In addition, the proposed project would be required to comply with Chapter 9.45, Grading, of the Millbrae Municipal Code, and obtain a grading permit. The grading plan application would be required to include an interim construction erosion control plan and a final erosion control plan that identifies surface runoff and erosion control measures to minimize sediments and other pollutants from entering the storm drain system. The proposed project would also be required to incorporate erosion and sedimentation control measures and construction BMPs as required by the City's Stormwater Management and Discharge Control Ordinance (Chapter 27A of the Millbrae Municipal Code).

All project structures would be constructed above-ground; however, the geotechnical study recommends that the proposed project remove the undocumented fill and compressible soils from the project site that extend from 3 to 9 feet bgs (ENGEO 2020). Therefore, groundwater may be encountered during excavation activities, and temporary construction dewatering may be necessary. If dewatering is used, the applicant would be required to comply with the waste discharge requirements of the San Francisco Bay RWQCB. Discharge of non-stormwater from an excavation that contains sediments or other pollutants to sanitary sewer, stormwater systems, creek beds (even if dry), or receiving waters without treatment is prohibited. Discharge of uncontaminated groundwater from dewatering is a conditionally exempted discharge by the San Francisco RWQCB. The removed water could potentially be contaminated with chemicals released from construction equipment or sediments from excavation. Therefore, discharge of water resulting from dewatering operations would require an NPDES Permit or a waiver (exemption) from the San Francisco Bay RWQCB, which would establish discharge limitations for specific chemicals (if they occur in the dewatering flows). If groundwater does not meet water quality standards, groundwater must either be treated as necessary prior to discharge so that all applicable water quality objectives (as designated in the Basin Plan) are met or hauled offsite for treatment and disposal at an appropriate waste treatment facility that is permitted to receive such water The proposed project would also be required to implement Mitigation Measure GEO-2 which would require preparation of a dewatering plan in accordance with the requirements of the RWQCB. The dewatering plan would detail the location of dewatering activities, equipment, and discharge point in accordance with the requirements of the RWQCB. The dewatering plan would be submitted to the City for review and approval prior to the start of construction.

Therefore, with implementation of Mitigation Measures HYD-1 and GEO-2 and compliance with the City's stormwater and grading requirements, construction impacts to water quality would be less than significant.

Operation

As discussed in Section 2.2.6, Utilities, the project site currently contains approximately 255,286 square feet of impervious surface. The proposed project would create approximately 227,672 square feet of impervious surface. This would result in a net decrease of approximately 27,614 square feet of impervious surface on the project site.

Operation of the proposed project would create more than 10,000 square feet of impervious surfaces and, therefore, would be a Regulated Project under the MRP. The proposed project would comply with the MRP and SMCWPPP's C.3 provisions by incorporating low impact development site design measures consisting of bioretention basins and flow-through planters along Center Street and throughout the landscaped areas across the project site. These areas would provide approximately 66,134 square feet of pervious surface on the project site and would retain and treat

stormwater prior to entering the piped storm drain system. Treated runoff would be directly discharged from these features to the private onsite stormwater lines, which would connect to the existing 42-inch storm drain line in Center Street. Therefore, compliance with SMCWPPP's C.3 provisions of the MRP and the implementation of the proposed site designs and source control and treatment measures, impacts to water quality during operation would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure HYD-1 (Prepare and Implement a SWPPP) is required.

> **MM HYD-1: Prepare and Implement a SWPPP.** Coverage shall be obtained for the project under the Construction General Permit in effect at the time of project construction. Per the requirements of the California State Water Resources Control Board, a SWPPP shall be prepared for the proposed project to reduce the potential for water pollution and sedimentation from project construction activities. The SWPPP shall address site runoff, assuring that project runoff shall not affect or alter the drainage patterns on the project site. The SWPPP shall implement BMPs that comply with the City's Stormwater Management and Discharge Control Ordinance (Chapter 27A of the Millbrae Municipal Code), as well as Chapter 9.45, Grading, of the Millbrae Municipal Code and the Waste Discharge Requirements of the San Francisco Bay RWQCB Permit.

Mitigation Measure GEO-2 (Prepare and Implement Dewatering Plan and Shoring Plans) is required.

Level of Significance After Mitigation

Less Than Significant With Mitigation.

Impact HYD-2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact Analysis

Construction

The project site is in the South Westside Groundwater Basin. The City solely relies on surface water supplied by the SFPUC to serve its residents and does not supplement this supply with groundwater. In the mid-1990s, the City investigated drilling municipal groundwater wells as a supplemental water source but found no potential source of groundwater within the City's boundaries. Groundwater is not available or considered in the City's near-term water supply planning (City of Millbrae 2021). Furthermore, the South Westside Groundwater Basin is classified as a very-low priority basin by the California Department of Water Resources and is not in critical condition from overdraft (DWR 2018). The project site is currently served by the City's municipal water system and would continue to serve the proposed project. Therefore, the proposed project would not substantially decrease groundwater supplies that may impede sustainable groundwater management of the South Westside Groundwater Basin.

For design purposes, a groundwater level of 5 feet bgs at the project site was assumed (ENGEO 2020). Potential dewatering could be conducted on a one-time or temporary basis during the

construction phase but would not adversely affect groundwater supplies. Further, groundwater supplies would not be used during construction activities, such as dust control. As such, construction of the proposed project would result in a less-than-significant impact on groundwater supplies and groundwater recharge with implementation of Mitigation Measure GEO-2.

Operation

The project site is developed and currently has 255,286 square feet of impervious surface and 38,520 square feet of pervious surface. The proposed project would create approximately 227,672 square feet of impervious surface. This would result in a net decrease of approximately 27,614 square feet of impervious surface on the project site. The proposed project would comply with SMCWPPP's C.3 requirements of the MRP and incorporate low impact development site design measures consisting of bioretention basins and flow-through planters along Center Street and throughout the landscaped areas across the project site. These areas would provide approximately 66,134 square feet of pervious surface on the project site. Additionally, the proposed project would provide approximately 53,010 square feet of new landscaping in accordance with the City's Model Water Efficient Landscape Ordinance. The low impact development site design features and landscape plantings would reduce the amount of runoff from leaving the project site and allow for local infiltration of stormwater into the groundwater. As such, operation of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge that would impede sustainable groundwater management of the basin. Impacts would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure GEO-2 (Prepare and Implement Dewatering Plan and Shoring Plans) is required.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact HYD-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would:

i) Result in substantial erosion or siltation on- or off-site;

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site;

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

iv) Impede or redirect flood flows?

Impact Analysis

The project site is currently developed and contains approximately 255,286 square feet of impervious surface and 38,520 square feet of pervious surface. During project construction, ground-disturbing activities could result in erosion-related impacts which could temporarily alter drainage patterns. The proposed project would implement Mitigation Measure HYD-1 and prepare a SWPPP in accordance with the NPDES General Construction Permit. The SWPPP would specify BMPs to incorporate during construction to reduce the potential of erosion. Additionally, the proposed project would be required to comply with Chapter 9.45, Grading, of the Millbrae Municipal Code and the City's Stormwater Management and Discharge Control Ordinance (Chapter 27A of the Millbrae Municipal Code). Compliance with the City's grading and stormwater regulations would require the proposed project to implement an erosion control plan, and erosion control measures and construction BMPs in accordance with the provisions of the MRP and SMCWPPP's C.3 requirements. Therefore, with implementation of Mitigation Measure HYD-1 and compliance with Millbrae Municipal Code, the proposed project would not result in substantial erosion onsite or offsite and impacts would be less than significant.

The proposed project would create approximately 227,672 square feet of impervious surface and. Therefore, the proposed project would result in a net decrease of approximately 27,614 square feet of impervious surface on the project site. Operation of the proposed project would comply with SMCWPPP's C.3 requirements of the MRP and incorporate low impact development site design measures consisting of bioretention basins and flow-through planters along Center Street and throughout the landscaped areas across the project site. These areas would provide approximately 66,134 square feet of pervious surface on the project site. These features would collect impervious surface runoff prior to entering the piped stormwater system and would provide treatment, retention, and/or detention at the project site to control the volume of stormwater runoff and reduce the potential for erosion and flooding onsite or offsite. Treated runoff would be directly discharged from these features to the private onsite stormwater lines, which would connect to the existing and upgraded 42-inch storm drain line in Center Street. Based on the preliminary storm drain study prepared by BKF Engineers, the proposed project would result in a 7 percent decrease in stormwater runoff at the project site (BKF Engineers 2019, Appendix A). Therefore, the proposed project would not exceed capacity of the existing stormwater drainage system. Furthermore, the project site is not located in a FEMA flood zone and would not impede or redirect flood flows (FEMA 2019). As such, with implementation of Mitigation Measure HYD-1 and compliance with City grading and stormwater regulations, the proposed project would not substantially alter the existing drainage pattern of the project site, and impacts would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure HYD-1 (Prepare and Implement a SWPPP) is required.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact HYD-4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Impact Analysis

The project site is not within a 100-year floodplain zone and is not mapped in a tsunami inundation area or subject to seiche. The area directly north of the project site is designated Zone AH. Areas designated Zone AH have a 1 percent annual chance of flooding has a 1 percent annual chance of shallow flooding usually areas of ponding, where average depths are between 1 and 3 feet (FEMA 2019).

The project site is currently primarily developed with the El Rancho Inn and surface parking. Due to the amount of impervious surface area, stormwater currently flows north from the surface parking area toward Center Street, which potentially contributes to localized flooding in the area. The proposed project would increase the amount of onsite landscaping and bioretention areas, thereby reducing offsite stormwater runoff rates and volumes toward Center Street.

As discussed in Impact HYD-1, the proposed project would implement a SWPPP and applicable BMPs as part of Mitigation Measure HYD-1 to reduce potential water quality impacts during construction. The SWPPP would include BMPs that comply with the City's Stormwater Management and Discharge Control Ordinance (Chapter 27A of the Millbrae Municipal Code), as well as Chapter 9.45, Grading, of the Millbrae Municipal Code. Operation of the proposed project would also comply with the SMCWPPP's C.3 requirements of the MRP and incorporate low impact development site design measures consisting of bioretention basins and flow-through planters along Center Street and throughout the landscaped areas across the project site. These features would collect impervious surface runoff prior to entering the piped stormwater system and would provide treatment, retention, and/or detention at the project site. Therefore, the proposed project would not release pollutants due to project pollutants and impacts would be less than significant with implementation of Mitigation Measure HYD-1.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure HYD-1 (Prepare and Implement a SWPPP) is required.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation

Impact HYD-5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact Analysis

The City is in the South Westside Groundwater Basin, which is classified as a very-low priority basin by the California Department of Water Resources under the Sustainable Groundwater Management Act (DWR 2018). The Sustainable Groundwater Management Act requires governments and agencies of high- and medium-priority basins to develop and implement Groundwater Sustainability

Plans or Alternatives to Groundwater Sustainability Plans. Local public agencies in basins designated as low- or very-low-priority are not subject to the Sustainable Groundwater Management Act (DWR 2020). Furthermore, the City relies solely on surface water supplied by the SFPUC to serve its residents and does not supplement this supply with groundwater. As such, the proposed project would not conflict with or obstruct implementation of a sustainable groundwater management plan.

The proposed project is required to comply with the policies and objectives of the Water Quality Control Plan for the San Francisco Bay RWQCB. As discussed, the proposed project would be required to implement Mitigation Measure HYD-1 and obtain coverage under the NPDES Construction General Permit requiring preparation of a SWPPP. The SWPPP would be implemented during construction and would incorporate BMPs that meet the requirements of the San Francisco Bay RWQCB's Water Quality Control Plan to reduce potential impacts to water quality. Additionally, the proposed project would be required to comply with the City's grading requirements (Chapter 9.45 of the Millbrae Municipal Code) and implement erosion and sedimentation control measures and construction BMPs in accordance with the City's Stormwater Management and Discharge Control Ordinance (Chapter 27A of the Millbrae Municipal Code). In the event construction activities encounter groundwater, the proposed project would implement Mitigation Measure GEO-2 and prepare a dewatering plan in accordance with the requirements of the San Francisco Bay RWQCB. The dewatering plan would detail the location of dewatering activities, equipment, and discharge point in accordance with the requirements of the San Francisco Bay RWQCB. The dewatering plan would be submitted to the City for review and approval prior to the start of construction. Therefore, groundwater resources would be appropriately and sustainably managed.

Operation of the proposed project would also comply with the provisions of the MRP and the SMCWPPP's C.3 requirements by incorporating low impact development site design measures consisting of bioretention basins and flow-through planters along Center Street and throughout the landscaped areas across the project site. These areas would provide approximately 66,134 square feet of pervious surface on the project site and would allow for local infiltration of stormwater into the groundwater. Therefore, the proposed project would not conflict with or obstruct implementation of the Water Quality Control Plan for the San Francisco Bay RWQCB, and impacts would be less than significant with implementation of Mitigation Measures GEO-2 and HYD-1.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure GEO-2 (Prepare and Implement Dewatering and Shoring Plans) and Mitigation Measure HYD-1 (Prepare and Implement a SWPPP) are required.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

4.10 Land Use and Planning

	Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

4.10.1 Environmental Setting

The project site is approximately 6.7 acres and comprises three San Mateo County Assessor's Parcel Numbers, as outlined in Chapter 1.6, Project Location. Land uses surrounding the project site include multi-family and single-family residential developments to the northwest; the San Francisco Water Department and various commercial developments to the southeast; the Zen Peninsula Restaurant, hotels, and commercial auto-related businesses to the southwest; and the BART/Caltrain tracks to the northeast. SFO is about 0.25-mile northeast of the project site.

City of Millbrae General Plan Land Use Designation

The project site is designated High Density Residential and General Commercial by the City's 1998 General Plan. A portion of the project site that is designated High Density Residential would be allocated to the future hotel use. The General Plan defines the High-Density Residential land use designation as follows:

> The purpose of the High-Density Residential designation is to, "allow for residential development at a density of up to 80 units per acre. This density is usually associated with multi-family structures (apartments and condominiums) of 40 units per acre, but the highest density is associated with buildings up to six stories. Other uses include rooming and boarding houses, sanitariums, and rest homes. Professional offices could be allowed as a conditional use. Uses related to residential uses such as schools, churches, childcare centers, and tot lots may be permitted (City of Millbrae 1998a).

The proposed five-story apartment complex would provide 384 apartment units at a density of 69 dwelling units per acre and would be consistent with the type of uses allowed in the High-Density Residential land use designation.

The General Plan defines the General Commercial land use designation as follows:

> The purpose of the General Commercial land use designation is to provide areas for retail commercial uses, including apparel and accessory stores, food stores, banks, personal and professional services, hospitals, offices, furniture stores, restaurants, wholesale-retail trade, and auto-related uses. Apartments and outdoor sales are allowed as conditional uses (City of Millbrae 1998a).

The future hotel would be consistent with the type of uses allowed in the General Commercial land use designation.

4.10.1.1 Zoning

The project site is zoned Multi-Family Residential District (R-3) and Commercial I. A portion of the project site zoned Multi-Family Residential would be allocated to the future hotel use.

The purpose of the Multi-Family Residential district is to enable and enhance the residential character of those areas of the City designated for apartment living by requiring adequate amounts of cooperatively used service facilities and outdoor open space at the highest residential densities available in Millbrae. This district correlates with the "higher density" land use designation of the Millbrae General Plan (City of Millbrae 2019). Multi-family dwelling units are permitted in this zoning district, and commercial lodging uses are allowed with a conditional use permit. The maximum height of structures in the Multi-Family Residential district is 40 feet (City of Millbrae 2019).

For the proposed apartment complex, the applicant is requesting approval of a Residential Design Review permit, in addition to a Lot Line Adjustment and Lot Merger.

The purpose of the General Commercial zoning district is to provide commercial uses that do not necessarily specialize in serving the pedestrian shopper, but rather, because of the character of their products or services, are more appropriately although not exclusively located along major thoroughfares away from more centralized shopping areas. This district correlates with the "general commercial" land use designation of the Millbrae General Plan (City of Millbrae 2019). Multi-family dwellings and commercial lodging uses are allowed in this zoning district with a conditional use permit. The maximum height of structures in the General Commercial zoning district is 40 feet (City of Millbrae 2019). As discussed in Section 2.4.2, Approvals, the applicant has not submitted a development application to the City for the future hotel; therefore, this document does not discuss the entitlements and potential approvals associated with the future hotel.

4.10.1.2 State Density Bonus

The proposed project would comply with the State Density Bonus law and provide 5 percent of the total residential units (19 units) at the very-low-income level. Pursuant to Section 65915(b)(1) of the California Government Code, cities are required to grant a density bonus, modifications/waivers to development standards, and one concession/incentive to housing projects that provide affordable housing at certain levels. The applicant is not requesting a concession/incentive at this time but reserves the right to request one, if necessary. The applicant is entitled to the following two requested modifications/waivers for the proposed project based on the inclusion of 5 percent very-low-income units:

- Waiver of the maximum 40-foot height limit in order to achieve the proposed density. The applicant is requesting an approximate height of 65 feet.
- Waiver of the 1,000 square feet/unit minimum lot size per unit. In order to achieve the density, the applicant has requested an approximate average minimum lot size of 633 square feet per unit.

Pursuant to the State Density Bonus Law, a 'project's concessions/incentives and modifications/waivers do not make it inconsistent with the 'City's development standards. Additionally, the project proposes the mandatory maximum residential parking requirements pursuant to Section 65915(p)(1) (the project proposes 560 parking spaces, in excess of the 521

spaces per the State Density Bonus Law). Rather, a finding of consistency is made after taking these into account.

4.10.2 Previous Environmental Analysis

4.10.2.1 City of Millbrae General Plan EIR Summary

Chapter 4.1 of the General Plan EIR discusses potential impacts related to land use. The General Plan EIR determined that implementation of the General Plan would result in significant and unavoidable impacts related to consistency with the 1974 General Plan and changes in land use densities, scale, and character in the City (City of Millbrae 1998b).

The following General Plan policies are applicable to the proposed project[6]:

Policy LU1.1: **Quality of Millbrae's Residential Neighborhoods.** Assure that all new residential development, renovation or remodeling preserves and strengthens Millbrae's residential neighborhoods by requiring projects to be kept with the character of the neighborhood and be harmoniously designed and integrated with the existing neighborhood.

Policy LU3.4: **General Plan Land Uses and the Planning and Zoning Regulations.** Require that all proposed projects be consistent with the General Plan and other applicable development standards established by the City's Planning and Zoning Regulations.

Policy LU3.6: **Mixed Residential/Commercial Projects.** Encourage affordable housing production by allowing mixed residential/commercial projects. As appropriate, the City will encourage mixed use projects in areas designated for commercial use, with residential, office and/or live/work uses located above first-floor retail uses, with the residential portion of mixed use projects to be built at maximum allowed density to reduce trips, from and within the City. Proposed mixed use projects should:

a. Provide commercial uses for residents of the projects in which the establishment is located and for adjacent residences.

b. Limit commercial uses to the ground floor of a multi-story residential building or to single-story buildings.

c. Limit commercial uses to those that are compatible with residential.

d. Regulate signs through a planned sign program.

e. Protect residential uses from the noise and traffic generated by commercial establishments with landscaping, open space, and other design features.

f. Provide sufficient parking for residents, employees, and customers.

[6] In the Housing Accountability Act and Density Bonus Law letter provided for the proposed project, the California Department of Housing and Community Development determined that Policy LU1.2, Residential Densities, in the 1998 General Plan is subjective and inapplicable to the proposed project pursuant to the Housing Accountability Act (HCD 2020).

g. Provide an adequate amount of open space for use by residents of the project. Such open space areas should be designed to provide a private are for residents.

4.10.2.2 Plan Bay Area EIR Summary

The following summarizes the potential impacts related to land use and planning discussed in Chapter 3.11 of the Plan Bay Area EIR and includes the complete text of mitigation measures previously identified by the Plan Bay Area EIR that are applicable to the proposed project.

Impact LU-1: Physically Divide Established Community. The Plan Bay Area EIR determined that implementation of the projected land use growth would create more centralized development and would not physically divide established communities. However, transportation projects could result in potential division from placement of structures. The Plan Bay Area EIR identified Mitigation Measure LU-1 to reduce impacts from transportation projects to a less-than-significant level. The proposed project would not be characterized as a transportation project; therefore, this mitigation measure is not applicable.

Impact LU-2: Conflict with Applicable Land Use Plans, Policies, or Regulations. The Plan Bay Area EIR determined that future development and/or transportation projects could conflict with existing long-range plans. The Plan Bay Area EIR identified Mitigation Measure LU-2 to reduce impacts; however, impacts would still be significant and unavoidable. Mitigation Measure LU-2 is regional in nature and, thus, does not apply to the proposed project.

4.10.3 Project-Specific Analysis

Impact LU-1 Physically divide an established community?

Impact Analysis

The project site is currently developed with a seven-unit residential building, one single-family residence, a hotel, and surface parking. The proposed project would involve redevelopment of the area and would include an apartment complex with 384 residential units, new parking garage, office space for property management, a hotel with 200 guest rooms, and common open space areas.

During construction, the proposed project would cause temporary disturbance to the established community. However, all leases are on a month-to-month agreement and would be terminated 2 months prior to start of construction. Therefore, no relocation of the existing residents onsite would occur. The area would continue to operate as a residential and hotel area once construction is complete. As such, the proposed project would not physically divide an established community and the impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact LU-2: 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 Analysis

The proposed project is subject to the goals and policies of the City's General Plan and the development standards of the City's Zoning Ordinance. Table 4.10-1 evaluates the proposed project's consistency with applicable goals and policies from the General Plan and requirements of the City's Zoning Ordinance. Additionally, the proposed project must be consistent with the Plan Bay Area. The project's consistency with the Plan Bay Area is discussed in Section 3.0, SCEA Criteria and Transit Priority Project Consistency.

Table 4.10-1. Applicable Plan and Policy Consistency Analysis

Policy/Goal Number	Policy/Goal	Determination of Plan Consistency
Policy LU1.1	*Quality of Millbrae's Residential Neighborhoods.* Assure that all new residential development, renovation or remodeling preserves and strengthens Millbrae's residential neighborhoods by requiring projects to be kept with the character of the neighborhood and be harmoniously designed and integrated with the existing neighborhood.	**Consistent.** The new residential units and future hotel would match the existing character of the site, which is currently developed with residential and hotel uses. The proposed project would comply with the City's design review process and incorporate the applicable design guidelines for both the multi-family and future hotel.
Policy LU2.1	*Site Planning and Design.* Ensure high quality site planning, architecture and landscape design for all new development, renovation, or remodeling.	**Consistent.** The proposed project would comply with the City's design review process and incorporate the applicable design guidelines for both the multi-family and future hotel uses.
Policy LU2.3	*Architectural Review Process for Residential Projects.* Require design review of residential projects to ensure compatibility of new residential projects, or property improvements, including room additions, with existing residential property, with the existing character of the neighborhoods in which they are located, and with respect to architectural style, scale, mass, bulk, color, materials, lot coverage and setbacks. Ensure that there is proper noticing of all such projects, and that there are opportunities for applicants to consult with neighbors on design issues and possible solutions. Design review shall also ensure that new residential projects are protected from the impacts of undesirable traffic, noise, or other intrusions when	**Consistent.** The proposed project would comply with the City's design review process and incorporate the applicable design guidelines for both the multi-family and future hotel uses.

Policy/Goal Number	Policy/Goal	Determination of Plan Consistency
	proposed near existing commercial or industrial uses.	
Policy LU3.4	*General Plan Land Uses and the Planning and Zoning Regulations.* Require that all proposed projects be consistent with the General Plan and other applicable development standards established by the City's Planning and Zoning Regulations.	**Consistent.** The proposed project would be consistent with the City's planning and zoning regulations as discussed and analyzed throughout this SCEA. The proposed project would comply with the City's design review process and incorporate the applicable design guidelines for both the multi-family and future hotel uses.
Policy LU3.6	*Mixed Residential/Commercial Projects.* Encourage affordable housing production by allowing mixed residential/commercial projects. As appropriate, the City will encourage mixed use projects in areas designated for commercial use, with residential, office and/or live/work uses located above first-floor retail uses, with the residential portion of mixed-use projects to be built at maximum allowed density to reduce trips, from and within the City. Proposed mixed use projects should: • Provide commercial uses for residents of the projects in which the establishment is located and for adjacent residences. • Limit commercial uses to the ground floor of a multi-story residential building or to single-story buildings. • Limit commercial uses to those that are compatible with residential. • Regulate signs through a planned sign program. • Protect residential uses from the noise and traffic generated by commercial establishments with landscaping, open space, and other design features. • Provide sufficient parking for residents, employees, and customers. • Provide an adequate amount of open space for use by residents of the project. Such open space areas should be designed to provide a private area for residents.	**Consistent.** The proposed project would consist of a mixed-use site with residential and hotel components. The residential of the proposed project would incorporate low-income housing units. Additionally, open space amenities would be included into the proposed project.

Notes:

City = City of Millbrae

SCEA = Sustainable Communities Environmental Assessment

du/ac = dwelling units per acre

In the Housing Accountability Act and Density Bonus Law letter provided for the proposed project, the California Department of Housing and Community Development determined that Policy LU 1.2, Residential Densities, in the 1998 General Plan is subjective and inapplicable to the proposed project pursuant to the Housing Accountability Act (HCD 2020).

The proposed project is consistent with all applicable land use policies as set forth by the General Plan, per the policy consistency analysis above. The proposed project is located within the R-3 and C zoning designations, which allows for 1 unit per 1,000 square feet of lot size (Millbrae Municipal Code Section 10.05.0820). This amounts to 291 units allowed for the 6.7-acre project site.

Pursuant to the State Density Bonus Law, the proposed 384 units would not be considered inconsistent with this requirement, because the proposed project is consistent with the General Plan designation maximum of 80 dwelling units per acre. This would amount to 536 units for the 6.7-acre project site. Pursuant to the State Density Bonus Law, the applicant is entitled to waivers from requirements that would physically preclude the development at the densities permitted under state law and, therefore, is seeking the following waivers:

- Waiver of the maximum 40-foot height limit to achieve the proposed density. The applicant is requesting an approximate height of 65 feet.
- Waiver of 1,000 square feet/unit minimum lot size per unit. In order to achieve the density, the applicant has requested an approximate average minimum lot size of 633 square feet/unit.

According to the City Zoning Code Section 10.05.0430, the developer may submit a written request for a density bonus, waivers, incentives, or concessions pursuant to California Government Code Section 65915. A project is not considered inconsistent with a General Plan or zoning development standard due to the request for a concession/incentive or waiver/modification. Rather, a finding of consistency is made after taking these into account.

Additionally, as discussed under Impact HAZ-5, Section 4.8.3, Project-Specific Analysis, the proposed project is within Area B of SFO's Airport Influence Area. The project site is not located in the "Outer Boundary of the Safety Field" or the "Noise Contour Zone" for SFO's AIA (City/County Association of San Mateo County 2012). Proposed development projects in the City of Millbrae outside of the Millbrae Station Area Specific Plan, within Area B of SFO's Airport Influence Area, are subject to review by the Airport Land Use Commission pursuant to CALUCP Policy GP-10.1.

California Government Code Section 65302.3 states that a local agency General Plan, Zoning Ordinance and/or any affected specific plan must be consistent with the applicable airport/land use criteria in the relevant adopted CALUCP. Additionally, per CALUCP Policy GP-10.1, since the City of Millbrae has not amended its General Plan and Zoning Code to reflect the policies and requirements of the current CALUCP, all proposed development projects within AIA B are subject to CALUC review. In accordance with these requirements, the City of Millbrae has referred the subject development project to C/CAG, acting as the San Mateo County Airport Land Use Commission, for a determination of consistency with the CALUCP. Additionally, the CALUCP contains height restrictions for areas that are critical aeronautical surfaces. Based on analysis by the CALUC, utilizing the 'SFO Online Airspace Tool", the building would be more than 82 feet below critical airspace. The project is located in an area that requires FAA notification for projects of any height. The project site is located within the AIA of SFO, the real estate disclosure area. Pursuant to Policy IP-1, notification is required, prior to sale or lease of property located within the AIA, of the proximity of the airport and that therefore the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations. (City/County Association of San Mateo County 2012).

At its October 28, 2021 meeting, the Airport Land Use Committee unanimously recommended that the C/CAG Board of Directors, acting as the Airport Land Use Commission, determine that the Project was consistent with the SFO CALUCP, subject to the following conditions:

- Prior to issuance of a building permit, the project sponsor shall file Form 7460-1 with the FAA and provide to the City of Millbrae an FAA "Determination of No Hazard".
- The City of Millbrae shall require that the project sponsor comply with the real estate disclosure requirements outlined in Policy IP-1 of the SFO CALUCP, which apply to sale or lease of property located within the AIA.

On November 18, 2021, the Board of Directors of the C/CAG, acting as the San Mateo County CALUC pursuant to its authority under Section 21670, adopted Resolution No. 21-82 determining that the project is conditionally consistent with the CALUCP.

The CALUCP also contains height restrictions for areas that are critical aeronautical surface (City/County Association of San Mateo County 2012). As proposed, the 5-story structure would be 63-feet 5-inches tall to the top of the rooftop stairwells. With a ground elevation of approximately 16.4 feet above MSL, the height of the project would therefore be about 80 feet above MSL., Utilizing the 'SFO Online Airspace Tool", the residential building would be more than 82 feet below critical airspace. The future hotel would have a maximum height of 85 feet and would also be below the critical airspace. Therefore, the proposed structures would be consistent with the height restriction established by the CALUCP. In addition, the proposed structures would not require further review pursuant to Federal Aviation Regulation Part 77 because these structures, with a maximum height of 85 feet, would be less than 200 feet tall.

Accordingly, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area, and impacts would be less than significant.

As discussed in Section 2.4.2, the applicant is only seeking entitlements for the proposed apartment complex. In the event the applicant decides to submit a separate development application to the City for the hotel, subsequent environmental review may be necessary to ensure that the potential environmental impacts for the final design of the hotel are adequately addressed and that it is consistent with the City's General Plan and Municipal Code.

In summary, the proposed project would not conflict with the City's General Plan, Zoning Ordinance, or other relevant plans and policies, and the impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

4.11 Mineral Resources

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

4.11.1 Environmental Setting

The California Geological Survey classifies lands into Aggregate and Mineral Resource Zones (MRZs) based on guidelines adopted by the California State Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act of 1974. These MRZs identify whether known or inferred significant mineral resources are present in an area. Local government is required to incorporate identified MRZs resource areas delineated by the state into their general plans. Accordingly, the General Plan does not identify any MRZs within the City. In addition, the City has not identified mineral resources of value and the City has not been delineated as a locally important mineral recovery site (City of Millbrae 1998b, DOC 2015).

4.11.2 Previous Environmental Analysis

4.11.2.1 City of Millbrae General Plan EIR Summary

The City does not contain any mineral resources within its limits; therefore, there are no mitigation measures from the General Plan EIR that would apply to the proposed project (City of Millbrae 1998b).

4.11.2.2 Plan Bay Area EIR Summary

The Plan Bay Area EIR determined that land use and transportation projects could result in development that would preclude the future extraction of mineral resources. However, projected land use growth was designed to be consistent with local planning documents, which are required to consider MRZs. In addition, most projects would occur within urban areas where extraction of mineral resources is unlikely. Accordingly, the impact would be less than significant, and no mitigation measures were identified (MTC/ABAG 2021).

4.11.3 Project-Specific Analysis

Impact MIN-1: 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?

Impact Analysis

The project site is developed with existing residential and hotel uses and is not identified within an area containing mineral deposits (DOC 2015). No mineral extraction activities exist on or the near the site, and mineral extraction is not included as part of the proposed project. Therefore, the proposed project would not result in the loss of availability of a known mineral resource, and no impact would occur.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

Impact MIN-2: 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 Analysis

The project site is not identified in the General Plan or by the California Department of Conservation Division of Mine Reclamation as containing valuable mineral resources (City of Millbrae 1998b, DOC 2015). Therefore, the proposed project would not result in the loss of availability of a locally important mineral resource recovery site, and no impact would occur.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

4.12 Noise

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

4.12.1 Environmental Setting

The information in this section is summarized from the Environmental Noise Assessment prepared by Bollard Acoustical Consultants (BAC) on February 22, 2018 (updated July 30, 2020) (Appendix I), and the Noise and Vibration Assessment prepared for the proposed project by Charles M. Salter Associates on February 4, 2020 (Appendix J).

4.12.1.1 Noise Fundamentals

Noise is often described as unwanted sound. Sound is defined as any pressure variation in air that the human ear can detect. If the pressure variations occur frequently enough (at least 20 times per second), they can be heard and, thus, are called sound. Measuring sound directly in terms of pressure would require a very large and awkward range of numbers. To avoid this, the decibel scale was devised. The decibel scale allows a million-fold increase in pressure to be expressed as 120 dB. Another useful aspect of the decibel scale is that changes in levels (dB) correspond closely to human perception of relative loudness.

The perceived loudness of sounds is dependent upon many factors, including sound pressure level and frequency content. However, within the usual range of environmental noise levels, perception of loudness is relatively predictable, and can be approximated by weighing the frequency response of a sound level meter by means of the standardized A-weighing network. There is a strong correlation between A-weighted sound levels (expressed as dBA) and community response to noise. For this reason, the A-weighted sound level has become the standard tool of environmental noise assessment. All noise levels reported in this section are in terms of A-weighted levels in decibels.

Community noise is commonly described in terms of the "ambient" noise level, which is defined as the all-encompassing noise level associated with a given noise environment. A common statistical tool to measure the ambient noise level is the average, or equivalent, sound level (Leq) over a given

time period (usually one hour). The Leq is the foundation of the Day-Night Average Level noise descriptor, Ldn, and shows very good correlation with community response to noise.

The Day-Night Average Level (Ldn) is based upon the average noise level over a 24-hour day, with a +10 decibel weighing applied to noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours. The nighttime penalty is based upon the assumption that people react to nighttime noise exposures as though they were twice as loud as daytime exposures. Because Ldn represents a 24-hour average, it tends to disguise short-term variations in the noise environment. Ldn-based noise standards are commonly used to assess noise impacts associated with traffic, railroad and aircraft noise sources.

A single noise event is an individual distinct loud activity, such as a train passage, or any other brief and discrete noise-generating activity. Because most noise policies applicable to transportation noise sources are typically specified in terms of 24-hour-averaged descriptors, such as Ldn or CNEL, the potential for annoyance or sleep disturbance associated with individual loud events can be masked by the averaging process.

Extensive studies have been conducted regarding the effects of single-event noise on sleep disturbance, with the Sound Exposure Level (SEL) metric being a common metric used for such assessments. SEL represents the entire sound energy of a given single-event normalized into a one-second period regardless of event duration. As a result, the single-number SEL metric contains information pertaining to both event duration and intensity. Another descriptor utilized to assess single-event noise is the maximum, or Lmax, noise level associated with the event. A problem with utilizing Lmax to assess singe events is that the duration of the event is not considered.

There is currently no national consensus regarding the appropriateness of SEL criteria as a supplement or replacement for cumulative noise level metrics such as Ldn and CNEL. Nonetheless, because SEL describes a receiver's total noise exposure from a single impulsive event, SEL is often used to characterize noise from individual brief loud events.

Due to the wide variation in test subjects' reactions to noises of various levels (some test subjects were awakened by indoor SEL values of 50 dB, whereas others slept through indoor SEL values exceeding 80 dB), no universal criterion has been developed for environmental noise assessments.

4.12.1.2 Existing Noise

An Environmental Noise Assessment was prepared by BAC on February 22, 2018 (updated July 30, 2020) (Appendix I) and includes information on existing noise and vibration levels at the project site. Onsite measured noise locations are shown in Figure 1 of Appendix I and the measured noise levels are shown in Table 4.12-1. Maximum noise levels are controlled by trains passbys at Site 3 and aircraft as well as traffic along El Camino Real at Site 1.

Table 4.12-1. Summary of Long-Term Ambient Noise Monitoring Results

Site	Date	Ldn, dB	Average Measured Hourly Noise Levels (dB)			
			Daytime 7 a.m. to 10 p.m.		Nighttime 10 p.m. to 7 a.m.	
			Leq	Lmax	Leq	Lmax
Site 1 – West side of project site, approximately 65 feet from centerline of El Camino Real	5/24/17	69	66	85	61	79
	5/25/17	69	67	85	61	79
Site 2 – North side of project site, approximately 35 feet from centerline of Center Street	5/24/17	65	60	80	59	79
	5/25/17	64	60	80	57	77
Site 3 – East side of project site, approximately 90 feet from centerline of BART/Caltrain tracks	5/24/17	72	68	94	65	83
	5/25/17	76	73	92	68	85

Notes:
dB = Decibel
Lmax = maximum sound level
Leq = equivalent sound level
Ldn = day-night sound level
Source: BAC, Inc. 2018

4.12.1.3 Vibration Standards

Vibration is like noise such that noise involves a source, a transmission path, and a receiver. While related to noise, vibration differs in that noise is generally considered to be pressure waves transmitted through air, whereas vibration usually consists of the excitation of a structure or surface. As with noise, vibration consists of an amplitude and frequency. A person's perception to the vibration would depend on his or her individual sensitivity to vibration, as well as the amplitude and frequency of the source and the response of the system that is vibrating.

Vibration can be measured in terms of acceleration, velocity, or displacement. A common practice is to monitor vibration measures in terms of peak particle velocities in inches per second. Standards pertaining to perception as well as damage to structures have been developed for vibration levels defined in terms of peak particle velocities. The City of Millbrae does not have specific policies pertaining to vibration levels. However, vibration levels associated with construction activities and proposed project operations are addressed as potential noise impacts associated with the project implementation.

Human and structural response to different vibration levels is influenced by a number of factors, including ground type, distance between source and receptor, duration, and the number of perceived vibration events. In Table 4.12-2, the general threshold at which human annoyance could occur is noted as 0.1 inch/second (in/sec) peak particle velocity (PPV). Table 4.12-3 indicates that the threshold for damage to structures ranges from a PPV of 0.2 to 0.6 in/sec.

Table 4.12-2. Guideline Vibration Annoyance Potential Criteria

	Maximum PPV (in/sec)	
Human Response	**Transient Sources**	**Continuous/Frequent Sources**
Barely Perceptible	0.04	0.01
Distinctly Perceptible	0.25	0.04
Strongly Perceptible	0.90	0.10
Severe	2.00	0.40

Notes:
Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.
In/sec = inches per second
PPV = peak particle velocity
Source: Caltrans 2013

Table 4.12-3. Guideline Vibration Damage Potential Criteria

PPV (in/sec)	Effect on Buildings
0.4 to 0.6	Architectural damage and possible minor structural damage
0.2	Threshold at which there is a risk of architectural damage to normal dwelling houses (houses with plastered walls and ceilings)
0.1	Virtually no risk of architectural damage to normal buildings
0.08	Recommended upper limit of vibration to which ruins and ancient monuments should be subjected
0.006 to 0.019	Vibration unlikely to cause damage of any type

Notes:
in/sec = inches per second
PPV = peak particle velocity
Source: Charles M. Salter Associates, Inc. 2020

4.12.2 Previous Environmental Analysis

4.12.2.1 City of Millbrae General Plan EIR Summary

Chapter 3.10 of the General Plan EIR discusses potential impacts related to construction noise, traffic noise, airport noise, and groundborne vibration. The General Plan EIR determined certain locations in the City would experience traffic noise increases by more than 3 dB. While it is possible to minimize potential noise impacts with implementation of noise-attenuating features the city cannot guarantee that these measures would take place. Therefore, the General Plan EIR determined impacts related to traffic noise would result in a significant and unavoidable impact. The General Plan EIR determined impacts related to construction noise, airport noise, and groundborne vibration would be less than significant as future projects would be required to comply with City's noise standards included in Chapter 9.22 of the Millbrae Municipal Code.

The following General Plan policies apply to the proposed project:

Policy NS1.2: **Protection of Residential Areas**. Protect the noise environment in existing residential areas, requiring the evaluation of mitigation measures for projects under the following circumstances:

a. The project would cause the Ldn to increase 3 dB(A) or more.

b. Any increase would result in a Ldn greater than 60 dB(A).

c. The Ldn already exceeds 60 dB(A).

d. The project has the potential to generate significant adverse community response.

Policy NS2.1: **Land Use Compatibility Standards**. New development must meet acceptable exterior noise level standards [See Table 4.12-4]. The "normally acceptable" noise standards for new land uses are established in the Noise and Land Use Compatibility Guidelines, as modified below:

a. The goal for maximum outdoor noise levels in residential areas is a Ldn of 60 dB. This level is a requirement to guide the design and location of future development and a goal for the reduction of noise in existing development. However, 60 Ldn is a goal which cannot necessarily be reached in all residential areas within the realm of economic or aesthetic feasibility. This goal will be applied where outdoor use is a major consideration (e.g., backyards in single-family housing developments and recreation areas in multi-family housing projects). The outdoor standard will not normally be applied to the small decks associated with apartments and condominiums, but these will be evaluated on a case-by-case basis. Where the city determines that providing n Ldn of 60 dB or lower outdoors is not feasible, the outdoor goal may be increased to a Ldn of 65 dB. If the noise source is a railroad, then the outdoor noise exposure criterion should be 70 Ldn for future development, recognizing that train noise is characterized by relatively few loud events.

b. The indoor noise level as required by the State of California Noise Insulation Standards us not exceed a Ldn of 45 dB in multi-family dwellings. This indoor criterion shall also be the maximum acceptable indoor noise level in new single-family homes.

c. Interior noise levels in new single-family and multi-family residential units exposed to a Ldn of 60 dB or greater should be limited to a maximum instantaneous noise level in the bedrooms of 50 dBA. Maximum instantaneous noise levels in other rooms should not exceed 55 dB.

d. Appropriate interior noise levels in commercial, industrial, and office buildings are a function of the use of space. For example, the noise level in private offices should generally be maintained at 45 Leq (hourly average) or less.

e. If an area currently is below the desired noise standard, an increase in noise up to the maximum should not necessarily be allowed. The impact of a

proposed project on an existing land use should be evaluated in terms of the increase in existing noise levels and potential for adverse community impact, regardless of the compatibility guidelines.

Table 4.12-4. Land Use Compatibility for Community Noise Elements

	Exterior Noise Exposure (Ldn or CNEL, dB)						
Land Use Type	**55**	**60**	**65**	**70**	**75**	**80**	**85**
Residential, Hotels, and Motels							
Outdoor Sports and Recreation, Neighborhood Parks and Playgrounds							
Schools, Libraries, Museums, Hospitals, Personal Care, Meeting Halls, Churches							
Office Buildings, Business Commercial, and Professional							
Auditoriums, Concert Halls, Amphitheaters							
Industrial, Manufacturing, Utilities and Agriculture							

Notes:

	Normally Acceptable: Specified land use is satisfactory, based on the assumption that any buildings involved are or normal conventional construction, without any special noise insulation requirements.
	Conditionally Acceptable: Specified land use may be permitted only after detailed analysis of the noise reduction requirements and needed noise insulation features included in the design.
	Unacceptable: New construction or development should generally not be undertaken because mitigation is usually not feasibly to comply with Noise Element policies.

Policy NS2.4: **Residential and Other Noise Sensitive Uses in Commercial or Industrial Areas**. New residential or other noise sensitive development or activities will not be allowed where the noise level due to commercial or industrial noise sources will exceed the noise level standards set forth in the table titled Land Use Compatibility for Community Noise Environments, with the following modifications:

a. In the event the measured ambient noise level exceeds the applicable noise level standards in any category expressed in [Table 4.12-5], the applicable standards will be adjusted so as to equal the ambient noise level to establish a noise standard capable of being enforced through the City's noise Ordinance.

b. Each of the noise level standards specified in [Table 4.12-4] will be reduced by 5 dB for simple tone noises, noises consisting primarily of speech or music, or recurring impulsive noises due to the greater annoyance factor associated with these types of noise.

Table 4.12-5. Maximum Allowable Noise Exposure for Stationary Noise Sources[1]

	Daytime[5] 7 a.m. to 10 p.m.	Nighttime[2,5] 10 p.m. to 7 a.m.
Hourly Leq, DB[3]	55	45
Maximum Level, dB[3]	70	65
Maximum Level, dB Impulsive Noise[4]	65	60

Notes:

[1] As determined at the property line of the receiving land use. 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.

[3] Sound level measurements shall be made with "slow" meter response.

[4] Sound level measurements shall be made with "fast" meter response.

[5] Allowable levels shall be raised to the ambient noise levels where the ambient levels exceed the allowable levels. Allowable levels shall be reduced 5 dB if the ambient hourly Leq is at least 10 dB lower than the allowable level.

Policy NS2.7: **Compliance with State Noise Insulation Standards**. The adopted Noise Element will serve as a guideline for compliance with the State's noise insulation standards. Recognizing the need to provide acceptable habitation environments, State law requires noise insulation of new multi-family dwellings constructed within the 60 dB Ldn noise exposure contours. It is a function of the Noise Element to provide noise contour information around all major sources in support of the sound transmission control standards (Chapter 2-35, Part 2, Title 24, California Administrative Code).

4.12.2.2 Plan Bay Area EIR Summary

The following summarizes the potential noise impacts discussed in Chapter 3.12 of the Plan Bay Area EIR and includes the complete text of mitigation measures previously identified by the Plan Bay Area EIR that are applicable to the proposed project.

Impact NOISE-1: Construction Noise Levels. The Plan Bay Area EIR determined future development project have the potential to result in substantial construction noise levels such that nearby sensitive receptors could be adversely affected, and noise standards exceeded. Impacts would be significant and unavoidable with implementation of Mitigation Measures NOISE-1 (refer to Impact NOI-1 and Impact NOI-2 in Section 4.12-3).

PBA EIR MM NOISE-1: To reduce construction noise levels to achieve the applicable noise standards of the relevant jurisdiction within the Plan Area, implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

- Comply with local construction-related noise standards, including restricting construction activities to permitted hours as defined under local jurisdiction regulations (e.g., Alameda County Code restricts construction noise to between 7:00 a.m. and 7:00 p.m. on weekdays and between 8:00 a.m. and 5:00 p.m. on weekends).
- Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.

- Designate an onsite construction complaint and enforcement manager for the project.
- Post procedures and phone numbers at the construction site for notifying the implementing agency staff, local police department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.
- Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silencers, wraps).
- Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.
- Locate stationary equipment, such as generators, compressors, rock crushers, and cement mixers, a minimum of 50 feet from sensitive receptors, but further if possible.
- Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- Erect temporary construction-noise barriers around the construction site when adjacent occupied sensitive land uses are present within 75feet.
- Use noise control blankets on building structures as buildings are erected to reduce noise emission from the site.

Impact NOISE-2: Increased Permanent Ambient Noise. The Plan Bay Area EIR determined some areas would result in regional average noise increases and localized traffic-related noise levels that exceed applicable thresholds and result in a substantial permanent increase in noise. The Plan Bay Area EIR determined traffic noise impacts would be less than significant with implementation of Mitigation Measures NOISE-2(a) and NOISE-2(b) (refer to Impact NOI-1 in Section 4.12.3). Mitigation Measure NOISE-2(c) is not applicable to the proposed project because it is not located within 50 feet of a rail transit line.

PBA EIR MM NOISE-2(a): To reduce exposure from traffic noise when significant to achieve the applicable noise thresholds for each roadway type (i.e., 70 dBA CNEL for major roads/freeway, 65 dBA CNEL for all other roads), implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

- Design adjustments to proposed roadway or transit alignments to reduce noise levels in noise-sensitive areas (e.g., below-grade roadway alignments can effectively reduce noise levels in nearby areas by providing a barrier between the source and receptor).
- Use techniques such as landscaped berms, dense plantings, reduced-noise paving materials, and traffic-calming measures in the design of transportation improvements.

- Use rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require repavement, or normal reconstruction of roadways where repavement is planned.
- Maximize the distance between existing noise-sensitive land uses and new noise generating facilities and transportation systems.
- Contribute to the insulation of buildings or construction of noise barriers around sensitive receptor properties adjacent to the transportation improvement.
- Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is noise compatible with adjacent transportation facilities and land uses.
- Monitor the effectiveness of noise-reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.

Mitigation Measure NOISE-2(b): To reduce the exposure of existing sensitive receptors to non-transportation noise associated with projected development and achieve a noise reduction below 70 dBA CNEL or local applicable noise standard, implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

- Local agencies approving land use projects shall require that routine testing and preventive maintenance of emergency electrical generators be conducted during the less sensitive daytime hours (per the applicable local municipal code). Electrical generators or other mechanical equipment shall be equipped with noise control (e.g., muffler) devices in accordance with manufacturers' specifications.
- Local agencies approving land use projects shall require that external mechanical equipment, including HVAC units, associated with buildings and other stationary sources (e.g., commercial loading docks) incorporate features designed to reduce noise to below 70 dBA CNEL or the local applicable noise standard. These features may include locating equipment or activity areas within equipment rooms or enclosures that incorporate noise reduction features, such as acoustical louvers, and exhaust and intake silencers. Enclosures shall be oriented so that major openings (i.e., intake louvers, exhaust) are directed away from nearby noise-sensitive receptors. Site design considerations shall also incorporate appropriate setback distances, to the extent practical, from the noise and existing sensitive receptors to minimize noise exposure.

Impact NOISE-3: Groundborne Vibration or Noise. The Plan Bay Area EIR determined future development project have the potential to result in substantial groundborne vibration or noise such that nearby sensitive receptors could be adversely affected. Impacts would be less than significant with implementation of Mitigation Measures NOISE-3a and NOISE-3b. However, these mitigation measures do not apply to the proposed project because the project would not exceed any vibration noise standards (refer to Impact NOI-3 in Section 4.12-3).

Impact NOISE-4: Airport Noise Levels. The Plan Bay Area EIR analyzed the potential impact related to increased noise exposure from aircraft or airports and determined with implementation of Plan Bay Area Mitigation Measure NOISE-4 the impact would be less than significant. Plan Bay

Area Mitigation Measure NOISE-4 is not applicable to the proposed project as it would implement project-specific mitigation to reduce potential impacts related to aircraft noise generated from SFO.

4.12.3 Project-Specific Analysis

The project-specific impact assessment is based upon the Environmental Noise Assessment prepared by BAC on February 22, 2018 (updated July 30, 2020) (Appendix I) and the Noise and Vibration Assessment prepared for the proposed project by Charles M. Salter Associates on February 4, 2020 (Appendix J).

Impact NOI-1: Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact Analysis

Short-Term Construction

Construction activities would include use of heavy equipment for grading and other activities through completion of buildings and landscaping for the proposed project. Heavy trucks would travel to, from, and within the project area to move soil, equipment, and building materials. Smaller equipment, such as jack hammers, pneumatic tools, and saws could also be used throughout each of the construction phases in various areas. The noise and vibration associated with these activities would be generated within the entire project site and at off-site locations near any infrastructure improvements.

Existing residences and commercial buildings located adjacent to the project site with direct line-of-sight to construction activities may be affected by noise generated from project construction activities. This includes existing residential receptors across Center and Monterey Streets to the northwest and northeast that are 50-feet to 215-feet and 260-feet away, respectively, the San Francisco Water Department offices to the southeast (directly abutting the project), and commercial retail use across El Camino Real to the southwest, that are approximately 120-feet to 300-feet away. Potential construction noise impacts would vary with distance and shielding provided by existing buildings. The Noise and Vibration Assessment prepared by Charles M. Salter Associates analyzed noise levels for the proposed apartment complex and future hotel along the southeast property line to the façade of the San Francisco Water District office building, 280-feet away.

The Noise and Vibration Assessment (Appendix J) modeled construction noise for the proposed project based on the construction phases and equipment list provided in Section 2.0, Project Description. The results of the noise modeling are included in Tables 4.12-6 and 4.12-7.

Table 4.12-6. Estimated Construction Noise Levels – Proposed Apartment Complex

Construction Phase	Estimated Maximum Instantaneous Lmax Noise Level (dBA at 50 feet)	Estimated Maximum Hourly Leq Noise Level (dBA at 50 feet)	Estimated Maximum Hourly Leq Noise Level (dBA at 260 feet)
Demolition	90	83	73
Site Preparation	84	80	70
Grading/Excavation	85	81	71
Trenching and Foundation	84	80	70
Building – Exterior	84	80	70
Building – Interior	78	74	64
Paving	84	80	70

Notes:
dBA = A-weighted sound level
Lmax = maximum sound level
Leq= equivalent sound level
Source: Charles M. Salter Associates, 2020

Table 4.12-7. Estimated Construction Noise Levels – Future Hotel

Construction Phase	Estimated Maximum Instantaneous Lmax Noise Level (dBA at 120 feet)	Estimated Maximum Hourly Leq Noise Level (dBA at 120 feet)	Estimated Maximum Hourly Leq Noise Level (dBA at 215 feet)
Demolition	82	75	70
Site Preparation	76	72	67
Grading/Excavation	77	73	68
Trenching and Foundation	76	72	67
Building – Exterior	76	72	67
Building – Interior	70	66	61
Paving	76	72	67

Notes:
dBA = A-weighted sound level
Lmax = maximum sound level
Leq= equivalent sound level
Source: Charles M. Salter Associates, 2020

The City of Millbrae does not have specific noise limits for construction in the General Plan. Furthermore, the Municipal Code does not have specific noise limits, and instead sets allowable construction hours (see sections 9.05.040 and 9.10.050). Therefore, based on the Plan Bay Area 2050 EIR, it is assumed that construction noise limits promulgated by Caltrans and the FTA would apply as follows.

- Caltrans' 86 dB Lmax at a distance of 50-feet
- FTA's Construction Noise Criteria, not to exceed ambient levels plus 10 dB

Based on estimated equipment noise levels provided in Tables 4.12-6 and 4.12-7 and sound level measurement data, nearby noise-sensitive locations would likely experience construction noise with hourly values of up to 83 dBA Leq during demolition, which would exceed ambient levels by more

than 10 dB at residences along Center Street (assuming an ambient level of 60 dBA Leq based on measurements in Table 4.12-1). Furthermore, concrete saws are expected to generate noise levels exceeding 86 dB at 50 feet, which would exceed the Caltrans criteria. Although noise levels could exceed the Caltrans criteria, increases in noise levels from construction activities would be temporary. Additionally, the proposed project would implement Mitigation Measure NOI-1 (PBA EIR MM NOISE-1) to reduce temporary construction noise levels. Implementation of Mitigation Measure NOI-1 would ensure the proposed project complies with the construction hours outlined in the Millbrae Municipal Code, and ensure proper equipment use by locating equipment away from sensitive land uses and erecting temporary construction noise barriers around areas where concrete sawing is expected to take place, Barriers of sufficient height placed near the source can reduce noise levels by up to 20 dB. Therefore, with the implementation of Mitigation Measure NOI-1 (PBA EIR MM NOISE-1), any impacts from construction noise associated with the proposed project would be less than significant.

Project Operational Noise

Project Mechanical Equipment

It is anticipated that the proposed apartment complex and future hotel would be fully air-conditioned and that heating, ventilating, and air-conditioning units could be located in areas exposed to adjacent property lines. The following type of equipment may be included for the proposed apartment complex and future hotel:

- Outdoor condensing units similar to Rheem RP1518BJ for residential units and amenity spaces
- Corridor exhaust and rooftop scavenger fans for the proposed apartment complex (similar to Cook 165 ACRU-B and AAON)
- Various exhaust and supply fans for the proposed apartment complex and future hotel
- Generators for the proposed apartment complex and future hotel
- Residential parking garage and the future hotel parking garage are expected to be open air with no mechanical ventilation
- Outdoor heat pump for future hotel guestroom fan coils and some amenity spaces (similar to Samsung AC048JXADCH)
- Future hotel rooftop dedicated outside air units (similar to AAON)
- Future hotel rooftop packaged heat pumps (similar to Landmark KD/KHB)

Assuming exterior mechanical equipment or exhaust air openings would be largely confined to the roof of the building, they could be as close as 80 to 215 feet from the nearest residential property line (across Center Street).

Based on the distance of the nearest residential property line from the proposed apartment complex (80 feet), equipment for the proposed apartment complex would need to be selected with noise levels no louder than 70 dB at a distance of 5 feet if it is to operate during nighttime hours, or 80 dB if operating during daytime hours only. As the future hotel would be as close as 215 feet from the nearest residential property line, equipment would need to be selected with noise levels no louder than 78 dB at a distance of 5 feet if it is to operate during nighttime hours, or 88 dB if operating during daytime hours only.

The Rheem condensing unit for the proposed apartment complex has a sound power rating of 75 dBA, which corresponds to a noise level of approximately 62 dBA at 5 feet. An exhaust fan similar to the model indicated above would typically generate approximately 61 dBA at 5 feet. Therefore, the individual pieces of equipment selected for the proposed apartment complex would be expected to meet the City's Noise Ordinance. The equipment selected for the future hotel would also be expected to meet the City's Noise Ordinance. The Samsung heat pump unit has a sound pressure level rating of 55 dBA, presumably at around 5 feet. The RTU and rooftop heat pump units are rated at a sound power level of approximately 93 and 88 dBA, respectively, and corresponds a sound pressure level of 76 to 81 dBA at 5 feet. Exhaust/supply fans would vary in size and typically generate lower noise levels than the rooftop units.

Furthermore, depending on the final placement in relation to other equipment (which may increase noise levels due to combined noise), as well as parapet/barrier heights and shielding (which would reduce noise levels), noise levels may vary. As such, in order to ensure that noise levels would not exceed noise levels identified in the City's Noise Ordinance or other state noise standards, the proposed project would implement Mitigation Measure NOI-2 (PBA EIR MM NOISE-2(b)) and have an acoustical engineer review the design as it is developed to confirm noise levels meet requirements of the City's Noise Ordinance (General Plan Policy NS 2.14) and determine if additional noise-reduction measures are required, such as barriers or relocating equipment to more shielded locations farther from sensitive receivers. Therefore, with implementation of Mitigation Measure NOI-2 (PBA EIR MM NOISE-2(b)), impacts related to the operation of mechanical equipment from the proposed project would be less than significant.

Predicted Future Noise Levels from Traffic and Rail Transit at Outdoor Activity Areas

The project site is located along the Caltrain, UPRR, and BART (underground) railroad right of way on the northeast side of the project site. To predict future noise exposure at the noise-sensitive areas of the proposed development, the Environmental Noise Assessment prepared by BAC conservatively assumed that future ambient conditions would be approximately 2 dB higher than existing ambient conditions at the project site. This assumption is believed to be conservative because it represents a 60 percent increase in traffic volumes and Caltrain passbys over time (BAC 2020).

The proposed apartment complex includes three courtyard areas on the ground floor. Given the size and amenities offered in these locations, these areas are considered to be the primary outdoor activity areas of this development where the City's 60 dB Ldn exterior noise level standard would be applicable. The existing noise levels at the project site (Table 4.12-1) and offsets for shielding caused by intervening structures were used to predict future railroad and traffic noise exposure at the project site. The resulting noise levels at the primary outdoor areas for the proposed project are shown in Table 4.12-8.

Table 4.12-8. Predicted Future Noise Levels at Exterior Areas

Location	Future Level before Consideration of Shielding	Shielding Offset[1]	Predicted Future Noise Level with Shielding (dB L_{dn})
Courtyard 1	64	-14	50
Courtyard 2	65	-17	48
Courtyard 3	66	-20	46
City's Exterior Noise Standard		**60**	

Notes:
[1] Negative offsets due to proposed intervening buildings and elevation of outdoor activity areas.
Source: BAC 2020

As shown in Table 4.12-8, the predicted future noise levels from combined traffic and Caltrain operations would be below the City's 60 dB Ldn exterior noise level standard at the proposed outdoor areas for the apartment complex and future hotel; therefore, impacts would be less than significant.

Additionally, as discussed in the Noise and Vibration Assessment prepared by Charles M. Salter Associates, Inc., existing Ldn noise levels on adjacent roadways are above 60 dBA, an increase in noise levels would be considered significant at noise-sensitive land uses if the proposed project would result in an Ldn noise level increase of 3 dBA or more. The Noise and Vibration Assessment prepared by Charles M. Salter Associates, Inc. determined that the proposed project would not substantially increase traffic noise levels at noise-sensitive receptors in the vicinity. All intersections outside of the project site are calculated to have an increase of no more than 2 dBA between "no project" and "with project" conditions. Therefore, the proposed project would not cause increased traffic noise levels over the baseline conditions at the neighboring sensitive receptors and impacts would be less than significant.

General Plan Policy NS 2.1 states indoor noise level as required by the State of California Noise Insulation Standards must not exceed an Ldn of 45 dB in multi-family dwellings. The predicted building façade noise exposure and the degree of building noise reduction required to achieve 45 dB Ldn interior noise levels in accordance with General Plan Policy NS 2.1 are shown in Table 4.12-9.

Table 4.12-9. Predicted Exterior Building I Noise Levels

Façade	Predicted Ldn at Building Façade	Noise Reduction Required to Achieve 45 dB Ldn	Required Window STC Rating[1]
El Camino Real	72	27	32
Center Street	67	22	27
Railroad Tracks	72	27	32

Notes:
[1] These window STC requirements are to achieve satisfaction with the City's 45 dB Ldn interior noise level standard only.
Source: BAC 2020

As shown in Table 4.12-9, the window upgrades (windows above Sound Transmission Class [STC] 27) would be required at the upper floor windows of the future hotel rooms located adjacent to El Camino Real to reduce future traffic noise levels to 45 dB Ldn within those rooms. Although STC 32 windows would be suitable to reduce future traffic and railroad noise levels to 45 dB Ldn or less

within the residences and hotel rooms proposed nearest to the railroad tracks and El Camino Real, the City's 50 dB Lmax requirement within bedrooms (55 dB within other rooms) is more restrictive than the City's 45 dB Ldn requirement. As such, Table 4.12-10 shows the maximum building façade noise exposure at the ground and upper-floor locations of proposed project, as well as the degree of building façade noise reduction required to achieve 50 dB Ldn interior noise levels within bedrooms and the corresponding STC ratings required of the windows on these facades to achieve that degree of noise reduction.

Table 4.12-10. Maximum Exterior Building Façade Noise Levels

Façade	Predicted Ldn at Building Façade	Noise Reduction Required to Achieve 50 dB Lmax	Required Window STC Rating[1]
El Camino Real	85	35	35
Center Street	80	30	32
Railroad Tracks	93	43	42

Notes:
[1] These window STC requirements are to achieve satisfaction with the City's 50 dB Ldn interior noise level standard.
Source: BAC 2020

As discussed in the Environmental Noise Assessment prepared by BAC, while sound transmission does occur through every part of structures, the majority of exterior-to interior sound transmission occurs at the windows, which provide much less noise reduction than exterior walls (BAC 2020). As a result, window upgrades are the most effective way to reduce interior noise levels in high-noise environments. Therefore, to ensure compliance with the City's 50 dB Lmax interior standard and reduce the potential for sleep disturbance, the proposed project would implement Mitigation Measure NOI-4. Implementation of Mitigation Measure NOI-4 would require that the windows of the nearest residences to the railroad tracks and roadways be upgraded to higher STC ratings as indicated in Table 4.12-10, that resilient channels and double layers of sheetrock be installed on all exterior walls of all units located along the railroad tracks, and that mechanical ventilation should be included in each unit to allow occupants to close doors and windows as desired for acoustical isolation. Additionally, the proposed project would implement Mitigation Measure NOI-3 (PBA EIR MM NOISE-2(a)) which would require that a qualified acoustical engineer or noise specialist verifies that these applicable measures are incorporated into the project design to reduce noise exposure to levels below the City's 50 dB Lmax requirement within bedrooms (55 dB within other rooms) as required by General Plan Policy NS 2.1. As such, impacts would be less than significant with implementation of Mitigation Measures NOI-3 (PBA EIR MM NOISE-2(a)) and NOI-4.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure NOI-1 (PBA EIR MM NOISE-1: Construction Noise Levels), Mitigation Measure NOI-2 (PBA EIR MM NOISE-2(a): Increased Noise from Traffic and Transit), Mitigation Measure NOI-3 (PBA EIR MM NOISE-2(b): Ambient Noise), Mitigation Measure NOI-4 (Railroad Noise Reduction) are required.

MM NOI-4: **Railroad Noise Reduction:** The following measure from the February 22, 2018 (updated July 30, 2020) Environmental Noise Assessment shall be implemented into the design of the proposed project:

1. Windows of the nearest proposed residences to the BART/Caltrain tracks should be upgraded to STC ratings of 35 for buildings on El Camino Real, STC rating of 32 for buildings along Center Street, and STC rating of 42 for buildings near the railroad tracks.
2. Resilient Channels (Dietrich RC-Deluxe) should be installed between the exterior wall studs and interior sheetrock on each of the end units located directly adjacent to the BART/Caltrain tracks.
3. Double layers of sheetrock should be installed over the resilient channels on all exterior walls of the units located adjacent to the BART/Caltrain tracks.
4. Mechanical ventilation should be provided for all residences to allow occupants to close doors and windows as desired for acoustical isolation.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact NOI-2: Generation of excessive groundborne vibration or groundborne noise levels?

Impact Analysis

Temporary construction and vibration generated by nearby rail transit sources are the primary sources of vibration affecting the proposed project and nearby receivers. Operation of the proposed project itself is not expected to generate significant vibration and associated groundborne noise levels.

Primary vibration producing construction activities are likely to occur during demolition and site preparation with the use of dozers and possibly hydraulic breakers to clear the site and prepare the foundation of the building. Pile driving is not expected. The risk of damage to “normal dwelling houses” may begin to occur at a limit of 0.2 in/sec PPV for transient vibration events. For continuous vibration, human annoyance may begin to occur at a limit of 0.1 in/sec PPV. The nearest structures to the proposed apartment complex are located approximately 50-feet from the project site across Center Street, and the nearest sensitive receptors to the future hotel are located approximately 200 feet from the project site across El Camino Real. Tables 4.12-11 and 4.12-12 show the vibration levels at these distances that would be generated for the proposed project.

Table 4.12-11. Estimated Construction Vibration Levels – Proposed Apartment Complex

Equipment	Reference Vibration Level at 25-feet (in/sec PPV)	Vibration Level at 50-feet (in/sec PPV)
Large Bulldozer	0.089	0.03
Loaded Trucks	0.076	0.03
Hydraulic Breaker	0.089 to 0.24	0.03 to 0.08
Jackhammer	0.035	0.01

Notes:
In/sec = inch/second
PPV = peak particle velocity
Source: Charles M. Salter Associates 2020

Table 4.12-12. Estimated Construction Vibration Levels – Future Hotel

Equipment	Reference Vibration Level at 25-feet (in/sec PPV)	Vibration Level at 200-feet (in/sec PPV)
Large Bulldozer	0.089	0.004
Loaded Trucks	0.076	0.003
Hydraulic Breaker	0.089 to 0.24	0.04 to 0.01
Jackhammer	0.035	0.002

Notes:
In/sec = inch/second
PPV = peak particle velocity
Source: Charles M. Salter Associates 2020

As shown in Tables 4.12-11 and 4.12-12 above, vibration levels are not expected to exceed the 0.1 in/sec PPV threshold for human annoyance, or the 0.2 in/sec PPV threshold for damage to "normal dwelling houses" for the proposed project. At receptors further setback, vibration levels would be expected to be even lower and construction vibration and associated groundborne noise would be considered a less-than-significant impact with no mitigation required.

Rail Vibration

The project site is located along the Caltrain, UPRR, and BART (underground) railroad right of way on the northeast side of the project site. The Environmental Noise Assessment prepared by BAC for the proposed project measured vibration at a setback of approximately 90 feet from the centerline of the tracks and found that the average vibration velocity level was approximately 72 VdB. The proposed apartment complex would be setback approximately 130 feet and the future hotel would be setback approximately 675 feet. It is expected that vibration would be even lower at these setbacks and would not exceed the 72 VdB FTA criteria. Therefore, rail transit vibration and associated groundborne noise would be a less-than-significant impact.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact NOI-3: For a project located within the vicinity of a private airstrip or airport land use plan or, where such a plan has not been adopted, within two miles of a public airport of public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Impact Analysis

The project site is within the AIA for SFO; however, it is outside of the CNEL 65 dB contour line, which is considered acceptable for new multi-family residential development, and well beyond the 70 dB CNEL contours considered acceptable for new hotel development. As such, aircraft noise generated from SFO would have a less-than-significant impact on the outdoor areas for the proposed apartment complex and future hotel.

As discussed in Impact NOI-1, the proposed project would implement Mitigation Measures NOI-3 (PBA EIR MM NOISE-2(b)) and NOI-4 to ensure that interior noise levels would be below the City's 50 dB Lmax requirement within bedrooms (55 dB within other rooms) as required by General Plan Policy NS 2.1. The implementation of Mitigation Measures NOI-3 (PBA EIR MM NOISE-2(b)) and NOI-4 would also provide additional protection against sleep disturbance related to SFO aircraft single-events occurring during nighttime hours. As discussed in the Environmental Noise Assessment prepared by BAC, maximum aircraft noise exposure is not expected to exceed 80 dB Lmax at the project site; therefore, implementation of Mitigation Measures NOI-3 (PBA EIR MM NOISE-2(b)) and NOI-4 would be more than adequate to ensure that maximum aircraft noise levels within the proposed apartments and hotel spaces would be satisfactory relative to the City's interior noise level standards. As such, impacts related to noise generated from SFO would not expose people residing at the project site to excessive noise levels and impacts would be less than significant with implementation of Mitigation Measures NOI-3 (PBA EIR MM NOISE-2(b)) and NOI-4.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measures NOI-3 (PBA EIR MM NOISE-2(b)) and NOI-4 (Railroad Noise Reduction) are required.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation

4.13 Population and Housing

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

4.13.1 Environmental Setting

The City's population was 22,718 in 2020 (USCB 2018) and according to ABAG, the projected 2040 population for the City is expected to be 27,055 (ABAG 2018). This means that the City can expect to add about 4,337 more residents in the next 20 years, or about 215 more residents per year (Table 4.13-1).

Table 4.13-1. Population, Households, and Employment Projections for Millbrae

						Change 2020–2040	
	2020	2025	2030	2035	2040	Number	Percent
Total Population	22,718	22,640	26,745	26,610	27,055	4,337	19.1
Households	8,235	8,325	9,865	9,705	9,725	1,490	18.1
Total Jobs	6,570	6,630	6,730	7,385	11,595	5,025	76.5
Employed Residents	9,505	9,535	11,370	11,105	11,045	1,540	16.2

Source: ABAG 2018, USCB 2018

4.13.2 Previous Environmental Analysis

4.13.2.1 City of Millbrae General Plan EIR Summary

Chapter 4.3 of the General Plan EIR evaluated the potential impacts related to population and housing. According to the General Plan EIR, the General Plan will increase the number of housing units as well as non-residential square footage, and subsequently jobs, within the City. The General Plan found that development consistent with the General Plan would induce substantial population growth beyond ABAG projections and, therefore, would result in a significant and unavoidable impact. Displacement of people was found to result in a less-than-significant impact (City of Millbrae 1998b).

The following General Plan policies are applicable to the proposed project[7]:

Policy LU3.4: **General Plan Land Uses and the Planning and Zoning Regulations.** Require that all proposed projects be consistent with the General Plan and other applicable development standards established by the City's Planning and Zoning Regulations.

Policy LU3.6: **Mixed Residential/Commercial Projects.** Encourage affordable housing production by allowing mixed residential/commercial projects. As appropriate, the City will encourage mixed use projects in areas designated for commercial use, with residential, office and/or live/work uses located above first-floor retail uses, with the residential portion of mixed use projects to be built at maximum allowed density to reduce trips, from and within the City. Proposed mixed use projects should:

a. Provide commercial uses for residents of the projects in which the establishment is located and for adjacent residences.

b. Limit commercial uses to the ground floor of a multi-story residential building or to single-story buildings.

c. Limit commercial uses to those that are compatible with residential.

d. Regulate signs through a planned sign program.

e. Protect residential uses from the noise and traffic generated by commercial establishments with landscaping, open space, and other design features.

f. Provide sufficient parking for residents, employees, and customers.

g. Provide an adequate amount of open space for use by residents of the project. Such open space areas should be designed to provide a private are for residents.

4.13.2.2 Plan Bay Area EIR Summary

The following summarizes the potential impacts related to population and housing discussed in Chapter 3.11 of the Plan Bay Area EIR.

Impact LU-3: Induce Unplanned Growth. The Plan Bay Area EIR analyzed the potential impacts related to inducing substantial unplanned growth, either directly or indirectly and determined that the impact would be less than significant.

Impact LU-4: Displacement of Communities. The Plan Bay Area EIR analyzed the potential impacts related to residential or business disruption or displacement of existing population and housing and determined that implementation of the Plan Bay Area may result in displacement of existing residential units, necessitating construction of replacement housing. With the implementation of Mitigation Measure LU-4, the impact would remain significant and unavoidable. Mitigation Measure LU-4 is not applicable to the proposed project as the proposed project would be

[7] In the Housing Accountability Act and Density Bonus Law letter provided for the proposed project, the California Department of Housing and Community Development determined that Policy LU1.2, Residential Densities, in the 1998 General Plan is subjective and inapplicable to the proposed project pursuant to the Housing Accountability Act (HCD 2020).

constructed once the leases have ended for the existing residential properties. All leases are on a month-to-month agreement and would be terminated 2 months prior to start of construction.

4.13.3 Project-Specific Analysis

Impact POP-1: 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 Analysis

This analysis assesses the proposed project's potential to induce substantial population growth. There are two types of population growth: direct and indirect. Direct population growth can occur from the development of new residential units. Indirect population growth can occur from the creation of new employment opportunities or the removal of a barrier to growth (e.g., the extension of urban infrastructure to an undeveloped area). The proposed project would not significantly directly or indirectly induce population growth, as explained below.

Direct Population Growth

The proposed project would result in the construction of a multi-family apartment complex comprised of 384 units. Based on the U.S. Census Bureau 2018 population data of 2.73 residents per household[8] in the City, it is estimated that operation of the proposed project would generate approximately 1,048 residents (USCB 2018). Therefore, it is anticipated that the proposed project would generate 1,048 new residents. Currently, the project site includes an apartment building with seven units and a single-family residence that house a total of 23 existing residents onsite. Therefore, the project is estimated to result in 1,025 net new residents to the area. As discussed above, the City can expect to add about 4,337 more residents in the next 20 years, or about 215 more residents per year. The residential portion of the proposed project is expected to contribute up to approximately 1,025 new residents, which represents 23.6 percent of ABAG's population projection for the city by 2040. However, because the proposed project would be within the future planned growth estimates for the City, the proposed project would not result in a substantial increase in unplanned population growth. Additionally, the proposed project would not create new roads or extend utilities beyond those required for the proposed project. Therefore, implementation of the proposed project would not directly induce substantial growth in the area. Impacts would be less than significant.

Indirect Population Growth

Although the proposed project includes development of a future hotel, which could indirectly induce population growth, the redeveloped hotel would decrease the overall number of rooms, and thus employees or jobs from commercial uses. Currently, there are 108 staff members associated with the hotel, and this number would decrease to 90 full time staff members. Therefore, no new jobs would be created by the proposed project, and existing employees would reasonably be expected to be filled by the existing workforce in Millbrae or immediately surrounding areas. Therefore, the

[8] The U.S Census Bureau's 2018 household data of 2.73 persons per household is the average for all households in the City, including single-family and multi-family dwelling units (UCSB 2018). This rate is more conservative than the rate for multi-family dwelling units (2.1 persons per household).

proposed project would not indirectly induce substantial population growth and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact POP-2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Impact Analysis

The existing hotel use on the project site would be temporarily taken out of service and redeveloped as a part of the proposed project. However, the hotel guests are not considered permanent residents and are not considered further in this analysis. The existing apartment complex and single-family residence are both market rate rental properties. All leases are on a month-to-month agreement and would be terminated 2 months prior to start of construction. Therefore, no relocation of the existing 23 residents living onsite would occur. As discussed under Impact POP-1, the proposed project is expected to result in housing for up to approximately 1,048 residents, which would equate to up to 1,025 net new residents to the project site. Therefore, since the proposed project would not result in relocation of the existing residents onsite and would result in a net increase in overall units available, impacts related to displacement of substantial numbers of existing people or housing would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

4.14 Public Services

	Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
	Fire protection?	☐	☐	☒	☐
	Police protection?	☐	☐	☒	☐
	Schools?	☐	☐	☒	☐
	Parks?	☐	☐	☒	☐
	Other public facilities?	☐	☐	☒	☐

4.14.1 Environmental Setting

4.14.1.1 Fire Protection

Millbrae is served by the Central County Fire Department (CCFD), which provides fire suppression, rescue, emergency medicine, operational training, fire prevention investigation, and community education services. There are two fire stations within the City: Fire Station Number 37 located at 511 Magnolia Avenue, Millbrae, California 94030; and Fire Station Number 38 located at 785 Crestview Drive, Millbrae, California 94030. Fire Station Number 37 is the closest fire station to the project site, located approximately 0.25 mile south of the project site (City of Millbrae 2020).

According to the 2019-2020 Adopted Budget for the CCFD, there are 87 CCFD employed personnel, and in 2018, 7,424 calls were received. Approximately 33 percent of calls received were received by Fire Station 37 and approximately 9 percent of calls were received by Fire Station 38, with the majority of these calls regarding emergency response and rescue-related situations. The response time goal for CCFD is to arrive on a structure fire scene within 6 minutes of dispatch 100 percent of the time. The CCFD is currently meeting this goal (CCFD 2019).

4.14.1.2 Police Protection

The San Mateo County Sheriff's Office (SMCSO) Millbrae Police Bureau provides police protection services for the City of Millbrae. The Millbrae City Police Department is the nearest police station, located at 581 Magnolia Avenue, Millbrae, California 94030, approximately 0.30 mile southeast of the project site.

The SMCSO has 708 regular employees and includes multiple divisions and specialties, including the professional standards bureau, the criminal records and identification bureau, the property services bureau, the court security and transportation bureau, the health services bureau, and support

services staff (SMCSO 2017). Average response times for priority one calls in the 2018 to 2019 fiscal year was 5.03 minutes, while the target is 8 minutes (SMCSO 2019).

4.14.1.3 Schools

The City of Millbrae is served by two public school districts: the Millbrae School District and the San Mateo Union High School District. The breakdown of each school district by schools, current enrollment, and student to teacher ratios is included in Table 4.14-1 below.

Table 4.14-1. School District Facts

School District	Schools	Enrolment	Student to Teacher Ratios
Millbrae School District	Green Hills Elementary Meadows Elementary Taylor Middle School Lomita Park Elementary Spring Valley Elementary	2,433 students	24:1
San Mateo Union High School District	Aragon High School Burlingame High School Capuchino High School Hillsdale High School Mills High School Peninsula High School San Mateo High School San Mateo Adult School	9,484 students	20:1

Sources: EdData 2019; San Mateo Union High School District 2020

The nearest public schools to the project site are Lomita Park Elementary School (located approximately 0.22 mile north of the project site), Capuchino High School (located approximately 0.42 mile northwest of the project site), and Green Hills Elementary School (located approximately 0.34 mile west of the project site). The nearest private schools to the project site are Millbrae Nursery School (located approximately 70 feet north of the project site) and Saint Dunstan School (located approximately 400 feet west of the project site).

4.14.1.4 Parks

Millbrae residents enjoy a variety of recreational opportunities provided by the parks and recreation facilities located in the City. Millbrae's parks range from mini-parks (parks generally less than 1 acre in size) to neighborhood parks (generally 1 to 5 acres in size) to the City's Central Park, an 8-acre community park with a Community Center facility. According to a park inventory analysis recently conducted by the City, the city currently has 47.1 acres of developed parkland and open

space,[9] 7.3 acres of undeveloped parkland,[10] and 26.4 acres of undeveloped open space[11] (Carducci Associates, 2022). Residents also enjoy the recreational opportunities provided by the 93-acre County-owned Junipero Serra Park, of which 15 acres are located within the City's limits, and by several privately-owned recreational facilities in the city, including the 103-acre Green Hills Country Club golf course.

For this analysis, only developed parkland and open space was used because it includes landscaping and recreational equipment, such as play apparatuses and/or basketball courts or pathways that are maintained that city residents can use. Undeveloped parkland does not contain any recreational equipment or amenities available for use, and undeveloped open spaces are not developed and have no recreational equipment or amenities; therefore, these are not discussed further. Table 4.14-2 shows the size and owner of the City's 13 developed parks and open spaces.

Table 4.14-2. Developed Parks and Open Space in the City

Parks and Open Space	Acres	Owner
Developed Parks		
Bayside Manor Park	0.8	San Francisco International Airport
Central Park	8.1	City
Green Hills Park	2.0	City
Lion Bill Mitchell Park	0.8	City
Marina Vista Park	0.6	San Francisco International Airport
Meadows Park	2.3	City
Millbrae Skate Park	0.4	City
Mosta Grove Park	0.4	City
Rotary Park	1.0	City
Monterey Park	1.4	Joint Powers Board
City Facilities	5.1	City
Developed Open Space		
Spur Trail Property[1]	21.7	City
Josephine Waugh Soroptomist Park	2.5	City
Total	**47.1**	

Source: Carducci Associates, 2022.

Notes:

[1] Approximately 21.7 acres of the 49.2-acre Spur Trail Property have been improved. This acreage does not include Josephine Waugh Soroptimist Park, Lion Bill Mitchell Park, Mosta Grove Park, Rotary and Millbrae Skate Park.

[9] Developed park is defined as 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. Developed open space is defined as any area that is vacant of any structures and is primarily maintained in its natural condition. In some cases, this definition includes pathways, landscaping, and other improvements that 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.

[10] Undeveloped park is defined as City-owned parcels with no recreational equipment or amenities.

[11] Undeveloped open space is defined as City-owned parcels that are not developed and have no recreational equipment or amenities.

According to Chapter 6, Parks, Open Space and Conservation Element, the 1998 General Plan established a City standard of providing a minimum of 2.0 acres of parkland per 1,000 residents. However, the City is in the process of updating its General Plan and intends to update this standard to 3.0 acres of parkland per 1,000 residents, which is the standard on which the City's adopted Citywide Development Impact Fee Nexus Study is based.[12] Therefore, the parkland standard used in this analysis is based on a standard of 3.0 acres of parkland per 1,000 residents. According to the City's parks inventory analysis, the City currently has 2.1 acres of developed parkland per 1,000 residents, which is below the standard of 3.0 acres of parkland per 1,000 residents (Carducci Associates 2022).

Other Facilities

The San Mateo County Library provides public library services to 11 cities, including the City of Millbrae. The closest San Mateo County Library to the project site is the Millbrae Library, located at 1 Library Avenue, Millbrae, California 94030, about 0.3 miles southwest of the project site.

4.14.2 Previous Environmental Analysis

4.14.2.1 City of Millbrae General Plan EIR Summary

Chapter 4.7 of the General Plan EIR evaluated the potential impacts of future development under the General Plan on various public services including fire, police, schools, and parks. The General Plan EIR identified potentially significant impacts on public services. However, policies contained in the General Plan would reduce these potential impacts on public services to less-than-significant levels (City of Millbrae 1998b). The following General Plan policies are applicable to the proposed project:

Policy LU 5.1: **Adequacy of Public Infrastructure and Services.** Ensure that new and existing developments can be adequately served by municipal services and facilities in accordance with City standards. New projects which require construction or expansion of public improvements shall pay their fair share of the costs necessary to improve or expand infrastructure to serve them, including street improvements, parks, water storage tanks, sewer and water service, and other public services.

Policy LU 5.2: **Millbrae Library.** Retain and enhance the high quality library service at the Millbrae Library and cooperatively explore with the County ways to improve service, including potential expansion and remodel of the library to meet community needs and ensure continued quality service in the future, including continued participation in the Joint Powers Agreement with the County to provide.

Policy PC 1.3: **New Residential Development.** Require that all new multi-family residential projects provide a significant amount of onsite open space/recreation facilities for residents *or* provide a combination of park in-lieu fees and onsite recreational facilities.

Policy PC 2.3: **In Lieu Recreation and Condominium Park Fees.** Exact in-lieu fees according to California Government Code 66477 and the Municipal Code to fund park and

[12] Harris & Associates. Development Impact Fee Program, City of Millbrae. May 2020.

recreation facility improvements, and use the interest earned on fees to fund facility maintenance.

Policy PC 4.2: **Development Review Process.** Maximize open space preservation opportunities in the private development review process and other approaches that minimize on-going City costs and liability exposure and still achieve City open space goals.

4.14.2.2 Plan Bay Area EIR Summary

The following summarizes the potential impacts related to public services discussed in Chapter 3.13 of the Plan Bay Area EIR and includes the complete text of mitigation measures previously identified by the Plan Bay Area EIR that are applicable to the proposed project.

Impact PSR-1. Public Services. The Plan Bay Area EIR analyzed the potential impacts related to the need for expanding facilities to maintain adequate schools and emergency, police, fire, and park and recreation services and determined that, even with the implementation of Mitigation Measures PSR-1(a) and PSR-1(b), the impact would be significant and unavoidable. Plan Bay Area EIR Mitigation Measure PSR-1(a) requires local agencies to ensure that new development projects provide adequate public services, related infrastructure, and utilities in order to meet or satisfy levels identified in the applicable local general plan or service master plan, through compliance with existing local policies related to minimum levels of service for schools, police protection, fire protection, medical emergency services, and other government services (e.g., libraries, prisons, social services). Compliance may include requiring projects to either provide the additional services required to meet service levels, or pay fees toward the project's fair share portion of the required services pursuant to adopted fee programs and State law. Plan Bay Area EIR Mitigation Measure PSR-1(b) requires additional coordination between the service provider and the project if the project would result in additional demand on public services, and requires the implementation of mitigation measures to mitigate any impacts that could result from construction of new or expanded facilities. Plan Bay Area EIR Mitigation Measures PSR-1(a) and PSR-1(b) are not applicable to the proposed project because adequate service levels would be maintained for fire, police, schools, and other facilities (refer to Impact PUB-1 in Section 4.14.3). For impacts on parks, it is speculative to try to determine the impact of construction of future park facilities; therefore, the mitigation measures are not applicable (refer to Impact PUB-2 in Section 4.14.3).

4.14.3 Project-Specific Analysis

Impact PUB-1: 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:

Fire Protection?

Police Protection?

Schools?

Parks?

Other Public Facilities?

Impact Analysis

Fire Protection

Implementation of the proposed project would induce planned population growth, as the proposed project would include residential and hotel uses, as well as require both a temporary construction and permanent operational workforce. While the proposed project's temporary and operational workforce requirements would not induce substantial population growth in the project site or region, the proposed project would include residential housing as well as temporary housing through the hotel. As discussed in Section 2.0, Project Description, the proposed apartment complex would consist of 384 units and would house up to approximately 1,048 residents, or approximately 1,025 net new residents.

The project site is located within the service area of Fire Station Number 37, which is located approximately 0.25 mile south of the project site. As stated above, CCFD has a response time goal of 6 minutes or less, which it is currently meeting. By generating up to 1,025 net new residents, the proposed project would likely result in more service calls to the CCFD. The other proposed non-residential land uses (i.e., office space for property management) on the project site would also be anticipated to result in more service calls as well; however, these uses are consistent with the current operation and nature of the project site. The future hotel use would result in a decrease in guest rooms and maximum capacity compared to the existing hotel and, therefore, would not be likely to result in more service calls to the CCFD.

During project operations, emergency access would be provided at a driveway adjacent to the eastern boundary of the project site on Center Street. This driveway would connect to an emergency vehicle access lane that would extend along the east and south sides of the site perimeter and connect to the El Camino Real driveway. Additional fire hydrants would also be installed at the project site. The proposed project's circulation elements would be required to comply with applicable fire protection standards and requirements, and compliance would be confirmed as part of the building review process by CCFD.

All structural improvements constructed on the project site would comply with the standards contained in the current California Fire and Building Codes. As stated above, CCFD would review the proposed project's development plans during the project's planning and design phase and would inspect the project's construction site during the construction phase to ensure that all new improvements meet state and local Building and Fire Code requirements. Once operational, the proposed project would be subject to the CCFD building inspection program, which would ensure compliance with applicable state and local standards.

Given the City of Millbrae's average household size, occupancy of the new residential units would result in up to 1,025 net new residents, as discussed in Section 4.13, Population and Housing, thereby potentially increasing the need for fire protection services. However, given the infill nature of the proposed project, its location to existing stations, and the ability of CCFD to meet its current response time goal, the proposed project would not result in impacts on CCFD's response time and facilities, and would not require the construction or expansion of new facilities. In addition, the proposed project zoning is planned for within the General Plan, and this would not represent a

substantial increase in unplanned population growth. Therefore, the proposed project would have a less-than-significant impact on fire protection services.

Police Protection

The project site is located within the SMCSO service area and is currently served by the Millbrae City Police Department located approximately 0.30 mile southeast of the project site. SMCSO's response time goal is 8 minutes or less, which it is currently meeting with an average response time of approximately 5 minutes. By generating up to 1,025 new residents, the proposed project would likely result in more service calls to the SMCSO. In addition, the other proposed non-residential land uses (i.e., office space for property management) on the project site are also anticipated to result in more service calls as well; however, these uses would be consistent with the current operation and nature of the project site. The hotel use would result in a decrease in guest rooms and maximum capacity and, therefore, would not be likely to result in more service calls to the SMCSO beyond what currently exists.

As stated above, emergency access to the project site would be provided at a driveway on Center Street, which would connect to an emergency vehicle access lane that would extend along the east and south sides of the project site's perimeter and connect to the El Camino Real driveway. In addition, as part of proposed project approval, SMCSO would review and comment on the site plan as it relates to access and egress that are designed to enhance safety on the project site and reduce crime. Given the infill nature of the proposed project, its location to an existing station, and the ability of SMCSO to meet is current response time goal, the proposed project would not result in impacts on SMCSO's response time and facilities, and would not require the construction or expansion of new facilities. The increase in the number of residents at the project site would be considered minimal compared with the planned population growth in the rest of the City. Therefore, the proposed project would have a less-than-significant impact on police protection services.

Schools

In order to determine the impact of new housing development, each school district develops a student yield rate. The breakdown of each school district is shown in Table 4.14-3.

Table 4.14-3. Student Yield Rate

School District	Student Yield Rate
Millbrae School District (Grades K-8)	0.249 students per housing unit
San Mateo Union High School District (Grades 9-12)	0.2 students per housing unit
Total	**0.449 students per housing unit**

Source: Millbrae School District 2018

Therefore, applying the generation rate for both the Millbrae School District (kindergarten through eighth grades) and San Mateo High School District (ninth through twelfth grades), the new residential units (resulting in up to 1,025 net new residences) would generate up to approximately 460 new students (255 students in grades K-8; 205 in grades 9-12). The addition of up to approximately 460 new students could put a strain on both of these school district's capacity. Under SB 50, the residential component of the proposed project may be required to pay school impact fees to the extent applicable to ensure that adequate school and related facilities would be available. The other proposed non-residential land uses of the project site (i.e., the future hotel and office space for

property management services) would not increase the school population because it is anticipated that the temporary and permanent employees required by the proposed project would come from the City and county without the need for relocation of themselves and their families. As such, with payment of the required school impact fee, the proposed project would not result in the need for the construction or expansion of schools and the impact would be less than significant.

Parks

As described above, the parkland standard used in this analysis is based on the planned update to the General Plan and the City's adopted Development Impact Fee Nexus Study, which sets the standard at 3.0 acres of parkland per 1,000 residents. According to the City's parks inventory analysis, the City currently has 2.1 acres of developed parkland per 1,000 residents, which is below the standard of 3.0 acres of parkland per 1,000 residents.

The addition of up to approximately 1,025 residents from the proposed project would further decrease this ratio of developed parkland per 1,000 residents. While the proposed project would provide approximately 90,670 square feet of onsite common open space for project residents and guests, which would alleviate some of the project's demand for public park and recreation space, this would not improve the ratio of developed parkland per resident. Additionally, the existing hotel use on the project site would be temporarily taken out of service and redeveloped as a part of the proposed project. Although hotel guests are not considered permanent residents (thus affecting the parkland ratios), it is reasonable to assume that hotel guests could use nearby parks during their stay. Therefore, there would not be sufficient developed parkland in the City to maintain acceptable service ratios, which would result in the need for the construction of new park facilities or the expansion of existing facilities to meet the City's service ratios, which could result in significant impacts on the environment (e.g., construction-related air quality and noise impacts). However, the City's Capital Improvement Program does not currently identify plans for acquiring new parkland, and the City does not have reasonably foreseeable plans to do so at this time. Without knowing the locations and types of facilities that would be constructed or expanded to meet acceptable service ratios, it is speculative to try to determine the future impacts of such activities. Future parkland projects would be subject to environmental review pursuant to CEQA, and potential impacts and mitigation measures (if required) would be identified at that time. Therefore, this impact would be less than significant.

Other Public Facilities

The San Mateo County Libraries encompass 12 libraries across San Mateo County and collectively serve more than 2.2 million people annually (San Mateo County Libraries 2020). The closest San Mateo County Library to the project site is the Millbrae Library, located at 1 Library Avenue, Millbrae, California 94030. The proposed project's generation of up to approximately 1,025 new residents would not affect the City's ability to provide library space, which is generally considered a temporary and intermittently needed service. The proposed project would not result in the construction of new library branches or the expansion of existing branches. Therefore, impacts associated with other public facilities, including public libraries would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

4.15 Recreation

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

4.15.1 Environmental Setting

Millbrae residents enjoy a variety of recreational opportunities provided by the parks and recreation facilities located in the City. Millbrae's parks range from mini-parks (parks generally less than 1 acre in size) to neighborhood parks (generally 1 to 5 acres in size) to the City's Central Park, an 8-acre community park with a Community Center facility. According to a park inventory analysis recently conducted by the City, the city currently has 47.1 acres of developed parkland and open space, 7.3 acres of undeveloped parkland, and 26.4 acres of undeveloped open space (Carducci Associates 2022). Residents also enjoy the recreational opportunities provided by the 93-acre County-owned Junipero Serra Park, of which 15 acres are located within the City's limits, and by several significant privately-owned recreational facilities in the City, including the 103-acre Green Hills Country Club golf course.

For this analysis, only developed parkland and open space was used because it includes landscaping and recreational equipment such as play apparatuses and/or basketball courts or pathways that are maintained and that city residents can currently use. Undeveloped parkland does not contain any recreational equipment or amenities currently available for use, and undeveloped open space are not developed and have no recreational equipment or amenities; therefore, these areas are not discussed further. Table 4.14-2 in Section 4.14, Public Services, shows the size and owner of the City's 13 developed parks and open spaces.

The City's recent park inventory included an assessment of the condition of existing parks, and determined that most parks in the city are in good condition and well maintained. However, numerous deficiencies and signs of deterioration were observed, including a lack of restrooms and bicycle parking and broken picnic tables and grills. Accordingly, the City's Capital Improvement Program identifies several parks maintenance projects to address deteriorating conditions in existing facilities. These maintenance projects include the following:

1. Central Park Equipment Replacement
2. Bayside Manor - Playground Equipment Replacement
3. Marina Vista - Replace Playground Equipment
4. Spur Trail - Fitness Area (completed 2021)

5. Skate Park Upgrade
6. Mills Estate Park Improvements
7. Green Hills Improvements
8. Josephine Waugh Improvements
9. Meadows Park Improvements
10. Rotary Park Improvements
11. Lion "Bill Mitchell" Park Improvements
12. Various Athletic fields.

4.15.2 Previous Environmental Analysis

4.15.2.1 City of Millbrae General Plan EIR Summary

Chapter 4.7 of the General Plan EIR evaluated the potential impacts of future development under the General Plan on recreational resources. The General Plan EIR determined that, with implementation of General Plan polices, potential impacts related to recreational resources would be less than significant (City of Millbrae 1998b).

The following General Plan policies are applicable to the proposed project:

Policy PC 1.3: **New Residential Development**. Require that all new multi-family residential projects provide a significant amount of onsite open space/recreation facilities for residents *or* provide a combination of park in-lieu fees and onsite recreational facilities.

Policy PC 2.3: **In Lieu Recreation and Condominium Park Fees.** Exact in-lieu fees according to California Government Code 66477 and the Municipal Code to fund park and recreation facility improvements, and use the interest earned on fees to fund facility maintenance.

Policy PC 4.2: **Development Review Process.** Maximize open space preservation opportunities in the private development review process and other approaches that minimize on-going City costs and liability exposure and still achieve City open space goals.

4.15.2.2 Plan Bay Area EIR Summary

The following summarizes the potential impacts related to recreation discussed in Chapter 3.13 of the Plan Bay Area EIR and includes the complete text of mitigation measures previously identified by the Plan Bay Area EIR that are applicable to the proposed project.

Impact PSR-2: Recreation Facilities. The Plan Bay Area EIR analyzed the potential impact related to increased use of existing recreational facilities and determined the impact would be significant and unavoidable even with implementation of Mitigation Measure PSR-2. Mitigation Measure PSR-2 is not applicable to the proposed project because the impacts of future construction of new or

expanded recreational facilities would be speculative. However, project-specific mitigation has also been developed for impacts related to park maintenance (refer to Impact REC-1 in Section 4.15.3).

4.15.3 Project-Specific Analysis

Impact REC-1: 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?

Impact Analysis

The proposed apartment complex would result in up to approximately 1,025 new residents at the project site. The existing hotel use on the project site would be temporarily taken out of service and redeveloped as a part of the proposed project. Although the hotel guests are not considered permanent residents, and thus, would adversely affect the parkland ratios, it is reasonable to assume that the hotel guests could use nearby parks during their stay.

As described above in the Environmental Setting, existing physical deterioration has been documented at parks in the city (Carducci 2022). With the project's addition of approximately 1,025 new residents, additional demand would occur on the city's parks. Therefore, the proposed project would 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. This impact would be significant.

The City's parks and facilities inventory analysis and recommendation report recommends a fair-share mitigation fee of $2,758,367.25 to address maintenance needs of existing developed parks and open space (Carducci Associates 2022). This fee is based on a cost estimate prepared by the city of the costs of maintenance improvements to existing parks and open space as documented in the analysis prepared by the City which includes a total of $60,573,811.20. This equates to $2,691.09 per capita. As such, in order to ensure that substantial physical deterioration of parks is avoided, the proposed project would implement Mitigation Measure PUB-2 and require the project applicant to pay a fee of $2,758,367.25, which would be used for maintenance of existing developed parks, thus avoiding substantial physical deterioration of parks. Therefore, with implementation of Mitigation Measure REC-1, impacts related to substantial physical deterioration of parks from the proposed project would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure REC-1: Payment of Fees for Park Maintenance is required.

REC-1: Payment of Fees for Park Maintenance. To ensure the city has adequate funds to maintain existing parks, the project applicant must pay an in-lieu fee that is proportional to the amount of new residential and nonresidential development proposed. The total fee is $2,758,367.25 per household (Carducci, 2022). Based on the proposed project's 384 multifamily dwelling units, the project applicant must pay a total of $2,758,367.25 to the City, prior to the start of construction. The in-lieu fee will be used for the park maintenance projects identified in

the city's Capital Improvement Program as approved by the City Council as part of the City of Millbrae Operating and Capital Budget.

Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.

Impact REC-2: Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Impact Analysis

The proposed project would include approximately 90,670 square feet of common open space and approximately 6,858 square feet of onsite recreational amenities for residents (not including amenities associated with the hotel that would only be available to hotel guests during their stay). The onsite amenities would consist of approximately 6,858 square feet of interior space on the first and second floors and include community lounges with indoor/outdoor kitchens and dining, fitness center, bike locker and repair area, pet spa for grooming (wash station), and business pods for telecommuters. Additionally, the proposed project would provide approximately 90,670 square feet of common open space to residents consisting of three outdoor courtyard areas, a rooftop terrace, an EVA yard and pedestrian path, frontage along Center Street, and the entry court. The outdoor courtyard areas would include a swimming pool and spa, outdoor barbeque and dining areas, game and seating areas, outdoor fitness lawn, fountains, and fire pits. The rooftop terrace would be above the resident lounge and overlook the pool deck. The EVA yard and pedestrian path would be constructed around the site perimeter and provide secondary access to the outdoor courtyards, Center Street frontage, and El Camino Real frontage. The Center Street frontage would provide an 8-foot public walkway, courtyards, and public seating nodes with decorative furniture and paving. The EVA yard would also connect to the project's entry court. The entry court would include a publicly accessible water fountain courtyard, olive grove, and communal seating for residents.

The potential environmental effects of the planning, construction, and operation of the proposed project, as a whole, including these onsite common open space areas and recreational amenities, are identified and evaluated as part of this SCEA. This SCEA addresses the potential adverse environmental impacts that could occur as a result of implementation of the proposed project, and where applicable and feasible, identifies recommended mitigation measures that would reduce impacts to acceptable levels of significance. No additional environmental effects would occur beyond those that have already been identified as part of this proposed project analysis, and no additional mitigation is required as a result of the proposed project's inclusion of open space areas on the project site.

The proposed project would also not involve the construction of off-site recreational facilities. However, as described under Impact REC-1, expansion or maintenance of off-site recreational facilities would be required to addresses the project's impact on parks. Mitigation Measure REC-1 requires the project applicant to pay a fee of $2,758,367.25, which would be used for maintenance of existing developed parks. Future projects to construct or expand recreational facilities would require separate CEQA analysis to analyze construction and operation impacts and implement mitigation measures as required. However, these future impacts are speculative and cannot be determined at this time. Therefore, with implementation of Mitigation Measure REC-1, impacts related to construction or expansion of recreational facilities from the proposed project would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure REC-1, described above, is required.

Level of Significance After Mitigation

Less Than Significant Impact with Mitigation.

4.16 Transportation

	Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☒	☐	☐
b)	Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c)	Substantially increase hazards 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?	☐	☐	☐	☒

4.16.1 Environmental Setting

The information in this section is summarized from the Transportation Impact Analysis (Appendix K) prepared for the proposed project by Hexagon Transportation Consultants, Inc on December 11, 2019 (updated December 4, 2020).

Existing Roadway Network

The project site is north of the City's downtown district and located 0.5-mile of the SFO BART station. Additionally, the Millbrae BART/Caltrain transit station is located 0.75 mile south of the project site. The project site is located along El Camino Real, which is served by the SamTrans ECR bus route. The SamTrans ECR bus route provides service along El Camino Real and stops at the Millbrae BART/Caltrain station, Palo Alto Transit Center, the Daly City BART station, and SFO. The ECR bus arrives every 15-minutes on weekdays. The bus stops closest to the project site are located at the intersection of El Camino Real and Center Street.

The following roadways are in the vicinity of the project site:

- **U.S. Highway 101 (U.S. 101)** is a ten-lane freeway connecting cities and employment centers along the Bayshore. It is the major access route to Millbrae. On U.S.101 the Average Daily Traffic volumes are approximately 250,000 vehicles in both directions. There is a full cloverleaf interchange at Millbrae Avenue. Traffic conditions along U.S.101 are especially strained during commuting hours. U.S.101 provides direct access to the project site to and from the south at Millbrae Avenue.
- **Millbrae Avenue** is a major six lane arterial street that connects U.S.101 with El Camino Real. The El Camino Real and Millbrae Avenue is the City's most congested intersection.
- **El Camino Real** is a major six lane arterial (SR-82). It connects Millbrae with San Bruno on the north and Burlingame on the south. Parallel parking lanes and sidewalks line both sides of the street. The posted speed limit is 35 mph. There is a median which average 16-feet in width down the middle of the street with left turn lanes at major intersections.
- **Center Street** is a two-lane local connector street located north of the project site.

4.16.2 Previous Environmental Analysis

4.16.2.1 City of Millbrae General Plan EIR Summary

Chapter 4.4 of the City of Millbrae EIR discusses the potential impacts to traffic and circulation throughout the City. The EIR found that increased traffic is an unavoidable result of future development in the region. Development under the Millbrae General Plan will contribute minimally to the much more significant impact of increasing traffic in the region. The intent of the General Plan's Circulation Element policies is to effectively coordinate with regional planning entities in solving traffic impacts that are regional in scope and mitigation. Other potentially significant impacts include increased demand for parking and increased transit demand. The General Plan would have a beneficial effect on transit, bicycle, and pedestrian access by including policies and programs to encourage use of alternatives to the private automobile.

The following General Plan policies are applicable to the proposed project:

Policy C 1.2 **Traffic Diversion.** Protect community character along Millbrae's surface streets from the impacts of peak hour through traffic and diversions by discouraging non-local and commercial traffic from using local and collector streets through land use restrictions and traffic control devices, where appropriate. Minimize the diversion of traffic onto local residential streets by reducing potential "friction factors" on arterial streets such as on-street parking, bus stops, traffic signals, number and frequency of side streets or driveways, pedestrian activity and inadequate left-tum pockets.

Policy C 1.3 **Traffic Safety.** Maintain and improve traffic safety to minimize traffic accident potential, provide safe walking, and enforce speeding and other traffic safety laws. Require all traffic signals to have pre-empt systems installed for emergency vehicles.

Policy C 1.4 **Workable and Safe Access to New Commercial Projects.** Design new commercial developments so that, wherever possible, the minimum number of needed entrance or exit points shall be allowed to ensure safe and efficient internal traffic flow and to reduce through traffic delays on public roads serving the project.

Policy C 3.3 **New Development Requirements.** Require transportation-related mitigation attributable to a specific development when identified through required traffic analyses in order to maintain acceptable level of service standards. Assure that new projects pay their pro rata share of offsite street improvements that will be needed to serve the project. Such sharing will also cover the incremental improvement costs of the collector and arterial street system that will be utilized by project users.

Policy C 3.5 **Traffic Studies.** Require site-specific traffic studies (including access, circulation and parking) for development projects where there may be a substantial impact on the local street system. The City will evaluate traffic impacts and funding of improvements prior to approval of development projects or annexation of unincorporated areas.

Policy C 4.6 **Reduced Work Trips.** Adopt land use, housing and circulation policies supporting the jobs/housing balance, including local job creation, TSM, provision of housing for all income levels, satellite office sites, and telecommunications improvements to reduce or shorten home to work trips along the travel corridor.

Policy C 4.10 **Bike Parking Facilities.** Require adequate bike parking facilities at transportation centers, public parks and buildings, recreational facilities, commercial centers and large multi-family residential projects.

Policy 5.2 **Parking Lot Design.** Provide proper site planning and design to include screening of loading and storage areas, and providing parking areas adjacent to, but not in front of, the front of a structure, and to place employee parking and loading areas in the rear of the site. The placement of parking toward the rear of the site is especially applicable for industrial, wholesale and office uses.

Policy C 4.15 **Pedestrian System.** Develop a safe, pleasant pedestrian system that provides direct and convenient pedestrian access, designed to serve all segments of the public including the young, aged, and the disables. Pedestrian safety shall be duly considered in the design of intersection and other roadway improvements. The pedestrian circulation system is intended as a viable alternative mode of travel throughout the City by providing pedestrian facilities including trails, paths, and sidewalks that are safe, direct, and convenient.

Policy C 4.16 **Pedestrian Improvements.** Continue to require as a condition of development project approval the provision of sidewalks and curb ramps in accordance with American With Disabilities Act (ADA) requirements. Require utility poles, signs, street lights and street landscaping on sidewalks be placed and maintained to comply with ADA standards.

4.16.2.2 Plan Bay Area EIR Summary

The following summarizes the potential impacts related to transportation discussed in Chapter 3.15 of the Plan Bay Area EIR and includes the complete text of mitigation measures previously identified by the Plan Bay Area EIR that are applicable to the proposed project.

Impact TRA-1: Conflicts with Plans. The Plan Bay Area EIR analyzed the potential impact related to conflicts with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities and determined the impact would be less than significant. No mitigation measures were identified.

Impact TRA-2: Increase in VMT. The Plan Bay Area EIR analyzed the potential impact related to a substantial increase in per capita VMT, and determined that even with the implementation of Mitigation Measures TRA-2(a) through TRA-2(c) impacts would be significant and unavoidable. These mitigation measures are not applicable to the proposed project because the proposed project would not substantially increase VMT.

Impact TRA-3: Increase Hazards. The Plan Bay Area EIR analyzed the potential impact related to substantially increased hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and determined the impact would be less than significant. No mitigation measures were identified.

Impact TRA-4: Emergency Access. The Plan Bay Area EIR analyzed the potential impact related to inadequate emergency access and determined the impact would be less than significant. No mitigation measures were identified.

4.16.3 Project-Specific Analysis

Impact TRANS-1 Conflict with an applicable plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact Analysis

Roadway Facilities

Construction of the proposed project would not modify the existing roadway network. During construction, the proposed project would generate traffic through the transport of workers, equipment, and materials to and from the project site. It is anticipated that project construction would begin in 2023 and be completed by 2026 (3 years of construction anticipated).[13] Depending on the construction phase, the number of temporary construction workers would range from 10 to 150 workers per day. Construction workers would access the project site from El Camino Real and Center Street. All construction equipment and materials would be stored onsite. Project construction and grading activities are generally anticipated to occur within the project site. However, construction activities would temporarily extend as far as the centerline of Center Street to construct off-site improvements. Construction of the off-site improvements would require temporary street and sidewalk closures. The proposed project would implement Mitigation Measure TRANS-1, which would require the applicant to prepare a transportation construction plan for all phases of construction to maintain access for vehicles, bicycles, and pedestrians. The transportation construction plan would comply with the City's Encroachment Permit and identify appropriate temporary traffic control measures including delineation, warning signs, lights, flag persons and other safety devices required for the public safety. As such, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and the impact would be less than significant with mitigation.

Pedestrian Facilities

Sidewalks are present along all of the surrounding streets except for a 275-foot segment on the south side of Center Street between El Camino Real and the existing site driveway. The proposed project would close the existing sidewalk gap along Center Street to connect the proposed project with the El Camino Real and Downtown Millbrae Specific Plan areas and would make other frontage improvements to enhance pedestrian safety along Center Street, including curb extensions or bulb-outs at Center Street and San Anselmo Avenue and a midblock crossing with stop signs and high visibility crosswalk striping on Center Street. In addition, the proposed project would install a new sidewalk along the Zen Peninsula Restaurant frontage along Center Street to improve pedestrian connectivity, widen the sidewalk along El Camino Real to 10 feet, and install ADA curb ramps along Center Street.

[13] The Transportation Impact Analysis was prepared using a construction start date of April 2021. Since the report was finalized, the construction start date has been updated to April 2023. This change in the construction start date does not affect the analysis because transportation facilities surrounding the project site would be largely similar.

The proposed project would also make an additional fair-share contribution toward the El Camino Real streetscape and the El Camino Real and Center Street traffic signal modifications. Crosswalks with pedestrian signal heads are located at all signalized intersections in the project area, and the City has installed hybrid beacon signal heads at three pedestrian crossings on El Camino Real. Overall, the existing pedestrian facilities provide adequate connectivity between the project site and the surrounding land uses in the area, and impacts would be less than significant.

Bicycle Facilities

There are currently minimal bicycle facilities in the project area and no designated bike lanes along the surrounding streets. The San Mateo County Comprehensive Bicycle and Pedestrian Plan, adopted on September 8, 2011, has identified the following proposed improvements to the bike network within the project vicinity:

- San Antonio Avenue and Monterey Street are proposed for a Class I bicycle path.
- Larkspur Drive and Rollins Road is proposed to provide Class II bicycle lanes.
- San Anselmo Avenue, Magnolia Avenue, Richmond Drive and Hill Crest Boulevard are proposed for Class III signed bicycle routes.

These bicycle improvements would benefit bicyclists of the proposed project. Pursuant to Section 10.05.2120 of the Millbrae Municipal Code, the proposed project would be required to provide at least 54 bicycle parking spaces (10 percent of vehicle parking provided). The proposed apartment complex would exceed the requirements of the Millbrae Municipal Code and include 60 long-term and 12 short-term bicycle parking spaces for residents and visitors for a total of 72 bicycle parking spaces. Long-term bicycle parking spaces would be provided in two dedicated storage rooms located on the ground floor and first level of the parking garage, and bicycle racks would be provided along Center Street for short-term parking. The ground floor of the apartment complex would also include a bike station for maintenance and repairs.

The future hotel component would also be subject to the requirements of Section 10.05.2120 of the Millbrae Municipal Code and required to provide at least 19 bicycle parking spaces (10 percent of vehicle parking provided) for future hotel guests. Therefore, bicycle facilities and bicycle parking facilities included on the project site plan would be adequate, and impacts would be less than significant.

Transit Facilities

Based on the 2013 to 2017 American Community Survey, 85.6 percent of City residents commute to work in their car, and 5.1 percent use transit (The remaining trips use other modes of transportation such as a motorcycle, walk or bike). Based on this transit percentage, the proposed residential component and the future hotel are estimated to add 13 to 17 transit trips. These trips would be split between BART, Caltrain, and buses. It is unlikely that the proposed project by itself would generate enough demand for transit service to justify the expansion of bus, Caltrain, or BART service. It is anticipated that the existing transit service would be able to accommodate these additional transit trips and impacts would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure TRANS-1: Construction Traffic is required.

TRANS-1: Construction Traffic. The proposed project will implement the following BMPs:

- prepare a transportation construction plan for all phases of construction;
- establish construction phasing/staging schedule and sequence that minimizes impacts of a work zone on traffic by using operationally-sensitive phasing and staging throughout the life of the project;
- identify arrival/departure times for trucks and construction workers to avoid peak periods of adjacent street traffic and minimize traffic affects;
- identify optimal delivery and haul routes to and from the site to minimize impacts to traffic, transit, pedestrians, and bicyclists;
- identify appropriate detour routes for bicycles and pedestrians in areas affected by construction;
- coordinate with local transit agencies and provide for relocation of bus stops and ensure adequate wayfinding and signage to notify transit users;
- preserve emergency vehicle access;
- implement public awareness strategies to educate and reach out to the public, businesses, and the community concerning the project and work zone (e.g., brochures and mailers, press releases/media alerts);
- provide a point of contact for residents, employees, property owners, and visitors to obtain construction information, and provide comments and questions;
- provide current and/or real-time information to road users regarding the project work zone (e.g., changeable message sign to notify road users of lane and road closures and work activities, temporary conventional signs to guide motorists through the work zone); and
- encourage construction workers to use transit, carpool, and other sustainable transportation modes when commuting to and from the site.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact TRANS-2: Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impact Analysis

CEQA Guidelines Section15064.3(b) indicates that land use projects would have a significant impact if the project resulted in VMT exceeding an applicable threshold of significance. The guidelines further note that if existing models or methods are not available to estimate VMT for the project being considered, a lead agency may analyze the project's VMT qualitatively.

The City, at the time of this report, is undertaking a process of updating its significance thresholds to be consistent with SB 743 but has not released draft thresholds. In the absence of an adopted, or

even draft, City policy with numeric thresholds, the recommended guidance provided by the California Governor's OPR *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory*, published in December 2018, was used to evaluate potential VMT impacts. The OPR publication, as well as CEQA Guidelines Section 15064.3(b)(1) indicate that lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor have a less-than-significant impact on VMT. A high-quality transit corridor is a corridor which is served by major bus routes with a frequency of service interval of 15 minutes or less during the commute peak periods. This presumption would not apply if the project:

- Has a FAR of less than 0.75
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking)
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization)
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units

The project is located along the El Camino Real corridor, which is a high-quality transit corridor as it is served by the SamTrans ECR bus route that arrives every 15 minutes during weekends. Additionally, the project site is located 0.5 mile from the SFO BART station which is a major transit stop as it provides rail transit service throughout the Bay Area. The SFO BART station is accessible from SamTrans bus routes 292, 397, 398, and ECR. Therefore, the proposed project is expected to have a less than-significant impact on VMT. Additionally, the proposed project would have a FAR greater than 0.75 and would also implement a TDM Plan to provide less parking than what is required by the City. The proposed project would also replace the existing hotel, restaurant, and single-family residential homes to provide multi-family housing and, therefore, is consistent with the Plan Bay Area 2050 goals as a high-density infill residential development project near transit. Since the proposed project meets the above criteria, it would have a less-than-significant impact on VMT.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact TRANS-3: Substantially increase hazards to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact Analysis

Access to the site would be provided via one driveway on El Camino Real and three driveways on Center Street. The driveway closer to the intersection of El Camino Real and Center Street would provide access to the at-grade residential parking spaces, and a second driveway on Center Street would provide access to the residential parking garage. The third driveway on Center Street would connect to the EVA yard and pedestrian path that would extend along the southern and eastern edge of the project site to provide emergency access. The driveway on El Camino Real would provide access to the future hotel.

The width of the driveway on El Camino Real would be 26 feet, the two driveways on Center Street would be 24 feet, and the driveway to access the EVA yard and pedestrian path from Center Street would be 20 feet. According to City standards, two-way driveways should have a minimum width of 20 feet. The project access points should be free and clear of any obstructions to provide adequate sight distance, thereby ensuring that exiting vehicles can see pedestrians coming from either direction on the sidewalk and other vehicles or bicycles traveling on the street. Any landscaping and signage should be located in such a way as to ensure an unobstructed view for drivers entering and exiting the site.

As discussed in the Traffic Impact Analysis prepared by Hexagon Consultants, Inc. (Appendix K), adequate sight distance reduces the likelihood of a collision and provides drivers with the ability to locate sufficient gaps in the traffic flow. Sight distance generally should be provided in accordance with Caltrans standards. The minimum acceptable sight distance is often considered the Caltrans stopping sight distance. Sight distance requirements vary depending on the roadway speeds. The speed limit on Center Street is 25 mph. The Caltrans recommended stopping sight distance is 150 feet. This means that a driver must be able to see 150 feet down Center Street in order to stop for this speed and to avoid a collision with another vehicle (Hexagon Consultants Inc., 2020). However, there is on-street parking along the project frontage on El Camino Real and Center Street that could limit the sight distances for vehicles and bicycles. The proposed project would implement Mitigation Measure TRANS-2, which would require that standard no parking zones be established adjacent to the project driveways and that landscaping near the driveways is maintained such that adequate sight distance is provided for vehicles exiting the project site and can see approaching vehicles and bicycles on the road. Therefore, the proposed project would not substantially increase hazards due to a design feature, and impacts would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure TRANS-2 (Driveway Distance) is required.

> **MM TRANS-2: Driveway Distance.** The proposed project shall prohibit parking 50 feet on either side of the project driveways during the lifetime of the project. In addition, the applicant shall maintain landscaping near the driveways in perpetuity such that adequate sight distance is provided.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact TRANS-4 Result in inadequate emergency access?

Impact Analysis

The proposed project would not result in inadequate emergency access during construction and/or operation. Both El Camino Real and Center Street would provide adequate access in the event of an emergency. An emergency access driveway would be located adjacent to the eastern boundary of the project site on Center Street. This driveway would connect to an emergency vehicle access lane that would extend along the east and south sides of the site perimeter and connect to the El Camino Real driveway. The SMCSO and CCFD would review the proposed project's development plans during the project's planning and design phase and would inspect the project's construction site during the construction phase to ensure that all new improvements meet state and local Building and Fire Code requirements pertaining to safety and emergency access. In addition, once operational, the proposed project would be subject to the CCFD building inspection program, which would ensure compliance with applicable state and local standards, including requirements for emergency access. Therefore, the proposed project would have no impact.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

4.17 Tribal Cultural Resources

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

4.17.1 Environmental Setting

The Ohlone previously occupied the coastline in the San Francisco Bay Area, with territory stretching from San Francisco to Monterey Bay. In San Mateo County, the Ohlone concentrated near inland village sites, such as those located on the Colma and San Bruno Creeks, as well as seasonal villages on the shore of San Francisco Bay. The Ohlone were known to hunt deer, rabbits, fish, wild geese, and ducks in addition to gathering food such as nuts, roots, and berries and shellfish such as mussels and clams. Most of the fishing was done on the inland Bay regions, while the coast provided access to important mollusks, such as abalone and mussels, as well as stranded whales and sea lions (Levy 1978).

No tribal cultural resources were identified in the project site. A Native American Sacred Lands File search and outreach done by the City of Millbrae on November 15, 2017 was negative. Tribal consultation letters were also sent out to interested tribes on December 14, 2021 and January 3, 2022, pursuant to SB 52. The notification period ends January 14, 2022. As of the time of release of this draft SCEA, no tribes have requested consultation.

4.17.2 Previous Environmental Analysis

4.17.2.1 City of Millbrae General Plan EIR Summary

The General Plan EIR does not address the issue of "tribal cultural resources" because its publication in 2013 preceded the passage of AB 52 in 2014, which expanded CEQA by defining this issue area as a new resource category.

4.17.2.2 Plan Bay Area EIR Summary

The following summarizes the potential impacts related to tribal cultural resources discussed in Chapter 3.7 of the Plan Bay Area EIR and includes the complete text of mitigation measures previously identified by the Plan Bay Area EIR that are applicable to the proposed project.

Impact CUL/TCR-4: Tribal Cultural Resources. The Plan Bay Area EIR analyzed the potential impact related to substantial adverse change to the significance of a Tribal Cultural Resource (TCR) as defined in PRC Section 21074 and determined that, even with the implementation of Mitigation Measure CUL/TCR-4(a) and CUL/TCR-4(b), the impact would be significant and unavoidable (refer to Impact TRIB-1 in Section 4.17.3, Project-Specific Analysis).

PBA EIR MM CUL/TCR-4(a): If the implementing agency determines that a project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process required under PRC Section 21080.3.2, implementing agencies and/or project sponsors shall implement the following measures, where feasible and necessary, to address site-specific impacts and avoid or minimize the significant adverse impacts:

- Public agencies shall, when feasible, avoid damaging effects on any tribal cultural resource (PRC Section 21084.3[a]). If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process, provisions in the PRC describe mitigation measures that, if determined by the lead agency to be feasible, may avoid or minimize the significant adverse impacts (PRC Section 21084.3[b]). Examples include:
    - Avoiding and preserving the resources in place, including planning and constructing to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space to incorporate the resources with culturally appropriate protection and management criteria.
    - Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including:
        - (A) Protecting the cultural character and integrity of the resource.
        - (B) Protecting the traditional use of the resource.
        - (C) Protecting the confidentiality of the resource.
    - Establishing permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or using the resources or places.
    - Protecting the resource.

- The implementing agency shall determine whether or not implementation of a project would indirectly affect tribal cultural resources by increasing public visibility and ease of access. If it would, the implementing agency shall take measures to reduce the visibility or accessibility of the tribal cultural resource to the public. Visibility of the resource can be reduced through the use of decorative walls or vegetation screening. Accessibility can be reduced by installing fencing or vegetation barriers, particularly noxious vegetation, such as poison oak or blackberry bushes. It is important to avoid creating an attractive nuisance when protecting tribal cultural resources. Conspicuous walls or signs indicating that an area is restricted may result in more attempts to access the excluded area.

PBA EIR MM CUL/TCR-4(b): Implementing agencies and/or project sponsors shall implement measures, where feasible and necessary, based on project- and site-specific considerations, that include those identified below:

- Implement PBA EIR MM CUL/TCR-2.

4.17.3 Project-Specific Analysis

Impact TRIB-1: 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 California Native American tribe, and that is:

a.) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

b.) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Analysis

No known tribal cultural resources were identified within the project site or within 0.25-mile of the project site during the archival records search and literature review performed as part of the cultural resources inventory. A Native American Sacred Lands File search and outreach done by the City of Millbrae in November 15, 2017 was negative. Tribal consultation letters were also sent out to interested tribes on December 14, 2021 and January 3, 2022, pursuant to SB 52. The notification period ends January 14, 2022. As of the time of release of this draft SCEA, no tribes have requested consultation.

The project site is currently developed, and portions are covered by existing structures and paved areas. Though very unlikely, subsurface construction activities associated with the proposed project could potentially damage or destroy previously undiscovered TCRs. Therefore, the proposed project would incorporate Mitigation Measure CUL-1 (PBA EIR MM CUL/TCR-2 [which is the same as CUL/TCR-4(b)]) and Mitigation Measure TRIB-1 (PBA EIR MM CUL/TCR-4(a)), which require implementation of standard inadvertent discovery procedures and worker awareness training to reduce potential impacts to previously undiscovered subsurface TCRs. With implementation of

these mitigation measures, potential impacts on TCRs would be reduced to a less-than-significant level.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure CUL-1 (PBA EIR MM CUL/TCR-2: Archaeological Resources [which is the same as CUL/TCR-4(b)]) and Mitigation Measure TRIB-1 (PBA EIR MM CUL/TCR-4(a): Tribal Cultural Resources) are required.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

4.18 Utilities and Service Systems

	Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☒	☐	☐
b)	Have sufficient 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 proposed 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 statutes and regulations related to solid waste?	☐	☐	☒	☐

4.18.1 Environmental Setting

4.18.1.1 Water Supply

The City's Urban Water Management Plan (UWMP) addresses the water system operated by the City and describes the water supply sources; magnitudes of historical and projected water use; and a comparison of water supply to demands during normal, single-dry, and multiple-dry years. The City of Millbrae 2020 UWMP (City of Millbrae 2021), prepared in accordance with the Urban Water Management Planning Act (AB 797 as amended), is required for every urban water supplier that provides water for municipal purposes to more than 3,000 connections or supplying more than 3,000 acre-feet per year (AFY) of water to adopt and submit UWMPs every 5 years to the California Department of Water Resources. As of the fiscal year 2020, the City of Millbrae supplied water to 6,591 municipal water connections; therefore, the City is required to complete a UWMP.

Water is supplied to the project site by the City of Millbrae. As discussed in the City's UWMP, due to a number of geographical and economical constraints, the City does not produce potable water from within the City's service area. Like many of the cities in the greater San Francisco Bay Area, the City's entire potable water supply is purchased from the Regional Water System operated by SFPUC. The source water for SFPUC is primarily from the Hetch Hetchy water system, with some additional surface water contributions coming from Alameda County and the San Francisco Peninsula. The City's current recycled water use is limited to applications onsite at the WPCP. The recycled water is

used to wash down and clean equipment, including the bar screens and clarifiers, and for dust control at the facility. The total monthly volume of recycled water used onsite at the WPCP is 9 million gallons (MG). Recycled water for this purpose is planned to continue indefinitely.

The City receives water through five connections to the SFPUC's Regional Water System and distributes it to customers through approximately 75 miles of domestic water mains. The water distribution system boundary is coterminous within the City limits and consists of the following components:

- 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
- 6,611 service connections

The City is a member of the Bay Area Water Supply and Conservation Agency, an agency that represents the interests of the 26 total agencies that purchase water at a wholesale level from the SFPUC Regional Water System. The total annual water supply available to the City is set forth in the Water Supply Agreement and subsequent Water Sales Contract agreed upon between the City and the SFPUC (among other parties). During normal water years, the City's Individual Supply Guarantee is 3.15 million gallons per day (MGD), which corresponds to an annual volume of 1,150 MG.

The Regional Water System historically has met demand in its service area in all year types. However, the water available to SFPUC's retail and wholesale customers from the Regional Water System is constrained by hydrology, physical facilities, and the institutional parameters that allocate the water supply of the Tuolumne River. In addition, statewide regulations and other factors can impact the system reliability. Of note, the adoption of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment) is anticipated to impact the reliability of the Regional Water System supplies in the future. The Bay-Delta Plan Amendment was adopted by the SWRCB in December 2018, Resolution No. 2018-0059, to establish water quality objectives to maintain the health of the Bay-Delta ecosystem, with the stated goal of increasing salmonid populations in three San Joaquin River tributaries (the Stanislaus, Merced, and Tuolumne Rivers) and the Bay-Delta. The Bay-Delta Plan Amendment requires the release of 30-50 percent of the "unimpaired flow"[14] 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 its UWMP in normal years but would experience supply shortages in single dry years or multiple dry years. Based on an analysis by the Bay Area Water Supply and Conservation Agency, if the Bay-Delta Plan Amendment is implemented, the proposed unimpaired flow volumes would significantly reduce the water supply available through the Regional Water System during future drought conditions, and Bay Area Water Supply and Conservation Agency member agencies (including the City) would be required to reduce their water use by as much as 50 percent during drought years (City of Millbrae 2021).

[14] Unimpaired flow represents the natural water production of a river basin, unaltered by upstream diversions, storage, or by export or import of water to or from other watersheds.

The SWRCB has stated that it intends to implement the Bay-Delta Plan Amendment on the Tuolumne River by the year 2022, assuming all required approvals are obtained by that time. However, implementation of the Bay-Delta Plan Amendment is uncertain for multiple reasons, as summarized below (bullets are excerpted from a detailed discussion provided by SFPUC to water agencies in support of 2020 UWMP development).

- First, since adoption of the Bay-Delta Plan Amendment, over a dozen lawsuits have been filed in both state and federal courts, challenging the SWRCB's adoption of the Bay-Delta Plan Amendment, including a legal challenge filed by the federal government, at the request of the U.S. Department of Interior, Bureau of Reclamation. This litigation is in the early stages and there have been no dispositive court rulings as of this date.
- Second, the Bay-Delta Plan Amendment is not self-implementing and does not automatically allocate responsibility for meeting its new flow requirements to the SFPUC or any other water rights holders.
- Third, in recognition of the obstacles to implementation of the Bay-Delta Plan Amendment, the SWRCB Resolution No. 2018-0059 adopting the Bay-Delta Plan Amendment directed staff to help complete a "Delta watershed-wide agreement, including potential flow measures for the Tuolumne River" by March 1, 2019, and to incorporate such agreements as an "alternative" for a future amendment to the Bay-Delta Plan to be presented to the SWRCB "as early as possible after December 1, 2019." In accordance with the SWRCB's instruction, on March 1, 2019, SFPUC, in partnership with other key stakeholders, submitted a proposed project description for the Tuolumne River that could be the basis for a voluntary substitute agreement with the SWRCB. On March 26, 2019, the SFPUC adopted Resolution No. 19-0057 to support its participation in the voluntary agreement negotiation process. However, as of October 29, 2021, state regulators announced that the Voluntary Agreement negotiations process has ceased, with no agreement reached.

Additionally, the SFPUC is pursuing numerous options to improve the supply reliability projected in its 2020 UWMP and meet its Level of Service Goals. In particular, the SFPUC's Water Supply Improvement Program and its Water Management Action Plan articulate the SFPUC's goals and objectives to improve the delivery reliability of the Regional Water System, including water supply reliability. The Water Supply Improvement Program includes several water supply projects. Its program goal is to improve the SFPUC's ability to reliably meet its retail and wholesale customer water needs in non-drought and drought periods. The anticipated completion date of the overall WSIP is May 2023. As of September 2020, Water Supply Improvement Program local projects are 100 percent complete and regional projects are 98.8 percent complete. The SFPUC also developed a Water Management Action Plan in 2016 to provide the information necessary to begin developing a water supply program for the 2019 to 2040 planning horizon. The SFPUC intends that the Water Management Action Plan will guide its efforts to continue to meet its commitments and responsibilities to its customers, including the Bay Area Water Supply and Conservation Agency member agencies (City of Millbrae 2021).

Through implementation of its Long-Term Water Supply Reliability Strategy, the Bay Area Water Supply and Conservation Agency is also actively evaluating opportunities to increase the supply reliability of the Regional Water System. The strategy includes short- and long-term implementation plans including water supply management projects that could be implemented to meet identified needs. Potential projects include recycled water projects, desalination projects, water transfer projects, and local capture and reuse projects (City of Millbrae 2021).

4.18.1.2 Wastewater Treatment

The City operates a WPCP that treats wastewater generated within the service area boundary. The plant is located on the eastern edge of the City limits adjacent to Highway 101 and near San Francisco Bay. Wastewater reaches the WPCP through a network of approximately 57 miles of sanitary sewer lines, which are primarily under gravity flow conditions. The City also operates three sanitary sewer pumping stations. The WPCP is designed for a dry-weather operation of 3 MGD, with a wet-weather peak capacity of 9 MGD. From February 2014 through June 2018, the WPCP treated a daily average of 1.5 MGD, with the highest reported average daily flow being 7.6 MGD (San Francisco Bay RWQCB 2019). Therefore, the WPCP had 1.5 MGD of unused permitted dry weather flow capacity. The City disposes of its treated effluent through a force main into San Francisco Bay.

4.18.1.3 Stormwater Management

Stormwater management in the City is subject to the Municipal Regional Stormwater NPDES Permit for the San Francisco Bay Region adopted in December 2013. The City's Municipal Code contains regulations related to stormwater management in Chapter 8.70 of the Municipal Code, Storm Water Management and Discharge. In addition, the State of California's Porter-Cologne Water Quality Control Act of 1969 and other state legislation require municipalities to protect water quality.

The intent of these various laws and permits is to mitigate potentially detrimental effects of urban runoff through proper site design and source control early in the development review process, and to provide guidance in the selection of appropriate BMPs. BMPs are defined as methods, activities, maintenance procedures, or other management practices for reducing the amount of pollution entering a water body.

4.18.1.4 Solid Waste

Solid waste services within the City are provided by South San Francisco Scavenger Company, the firm franchised by the City to collect and dispose of refuse. The Scavenger Company also collects recyclables and yard trimmings at the curbside, along with food scraps. Waste collected from homes and businesses within the City is processed at Blue Line Transfer, Inc., a full-service public disposal and recycling facility in South San Francisco. Material that cannot be recycled or composted is transferred to the Ox Mountain Sanitary Landfill near Half Moon Bay. The current permitted disposal acreage is 173 acres, with a closure date of the facility scheduled for 2034; a longer period of operation may be allowed pending renewal of the landfill's permit (CalRecycle 2019). The landfill has a remaining capacity of approximately 22.2 million cy and has a maximum permitted capacity to receive up to 3,598 tons per day.

4.18.2 Previous Environmental Analysis

4.18.2.1 City of Millbrae General Plan EIR Summary

Chapter 4.7 of the City of Millbrae General Plan EIR discusses the potential impacts on utilities and service systems. The City of Millbrae General Plan EIR identified potentially significant impacts related to utilities and service systems, particularly to water distribution infrastructure, wastewater treatment capacity, and wastewater collection systems. Potential impacts to water supply, stormwater drainage and maintenance, and waste generation were considered less than significant. However, mitigation measures, existing local laws, and policies contained in the adopted 1998–2015

City of Millbrae General Plan would be implemented to reduce potential impacts on utilities and service systems to less-than-significant levels.

The following General Plan policies are applicable to the proposed project:

Policy LU5.1: **Adequacy of Public Infrastructure and Services.** Ensure that new and existing developments can be adequately served by municipal services and facilities in accordance with City standards. New projects which require construction or expansion of public improvements shall pay their fair share of the costs necessary to improve or expand infrastructure to serve them, including street improvements, parks, water storage tanks, sewer and water service, and other public services.

Policy LU5.5: **Adequate Utility Infrastructure.** Provide safe, reliable, and adequate utility infrastructure to meet the City's new and existing needs and to comply with applicable state, regional, and federal regulations, including: (1) water supply for existing and new normal and emergency needs; (2) sanitary sewer collection; (3) wastewater treatment and disposal; and (4) storm water collection as necessary to provide adequate drainage and flood protection during periods of high rain and high tides.

Policy LU5.6: **Recycled Water.** Consider the use of high quality recycled water for parks and private landscaping uses.

Policy LU5.7: **Water Conservation Techniques.** Promote the use of low-water-use and fire suppression landscaping and other water conservation measures.

Policy LU5.10: **Storm Water National Pollutant Discharge Elimination System (NPDES).** In coordination with the San Mateo City and County Association of Governments, continue to implement measures consistent with the San Mateo Countywide NPDES Stormwater Permit.

Policy LU5.11: **Integrated Waste Management.** Continue to manage the existing contract with South San Francisco City Scavengers to provide quality and cost effective solid waste removal throughout the City. Continue working to develop and implement an integrated waste management plan to meet the requirements of the California Integrated Waste Management Act (AB 939). Reduce the waste stream as required by State law.

4.18.2.2 Plan Bay Area EIR Summary

The following summarizes the potential impacts related to public utilities and facilities discussed in Chapter 3.14 of the Plan Bay Area EIR and includes the complete text of mitigation measures previously identified by the Plan Bay Area EIR that are applicable to the proposed project.

Impact PUF-1: New or Expanded Water, Wastewater, Stormwater, Electric, Natural Gas, or Telecommunications Facilities. The Plan Bay Area EIR analyzed the potential to require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects and determined that, even with implementation of Mitigation Measures PUF-1(a) through PUF-1(f), the impact would be significant

and unavoidable. The proposed project is not considered a transportation project; therefore, Mitigation Measures PUF-1(c) and PUF-1(d) are not applicable. In addition, the proposed project would not result in the need for relocation or construction of new or expanded; therefore, Mitigation Measures PUF-1(b), PUF-1(e), and PUF-1(f) are not applicable. The proposed project would implement Mitigation Measure UTIL-1 (PBA EIR MM PUF-1(a)) as discussed in Impact UTIL-1 in Section 4.18.3, Project-Specific Analysis.

PBA EIR MM PUF-1(a): Implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

- For projects that could increase demand on water and wastewater treatment facilities, coordinate with the relevant service provider to ensure that the existing public services and utilities could accommodate the increase in demand. If the current infrastructure servicing the project site is found to be inadequate, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities

Impact PUF-2: Water Supply. The Plan Bay Area EIR analyzed the potential impacts related to insufficient water supplies to serve expected development and determined that, even with the implementation of Mitigation Measures PUF-2(a), PUF-2(b), and PUF-2(c), the impact would be significant and unavoidable. The proposed project is not considered a transportation project; therefore, Mitigation Measures PUF-2(b) and PUF-2(c) are not applicable. The proposed project would implement Mitigation Measure UTIL-3 (PBA EIR MM PUF-2(a)) as discussed in Impact UTIL-1 in Section 4.18.3, Project-Specific Analysis.

PBA EIR MM PUF-2(a): Implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

- For projects that could increase demand for water, coordinate with the relevant water service provider to ensure that the provider has adequate supplies to accommodate the increase in demand. This can and should be documented in the form of an SB 610 Water Supply Assessment, an SB 221 Water Supply Verification, or other capacity analysis.
- Implement water conservation measures that result in reduced demand for potable water. This could include reducing the use of potable water for landscape irrigation (such as through drought-tolerant plantings, water-efficient irrigation systems, the capture and use of rainwater) and the use of water-conserving fixtures (such as dual-flush toilets, waterless urinals, reduced flow faucets).
- Coordinate with the water provider to identify an appropriate water consumption budget for the size and type of project and designing and operating the project accordingly.
- For projects located in an area with existing reclaimed water-conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects shall install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.

- Apply Tier 1 or Tier 2 CALGreen standards as mandatory local requirements, which reduce water use by 12 and 20 percent, respectively, and require additional qualifying elective actions.

Impact PUF-3: Wastewater Treatment Capacity. The Plan Bay Area EIR analyzed the potential impacts related to inadequate wastewater treatment capacity to serve new development and determined that, with the implementation of Plan Bay Area Mitigation Measure PUF-3, the impact would be less than significant. The proposed project would implement Mitigation Measure UTIL-4 (PBA EIR MM PUF-3) as discussed in Impacts UTIL-1 and UTIL-3 in Section 4.18.3, Project-Specific Analysis.

PBA EIR MM PUF-3: Implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

- During the design and CEQA review of individual future projects, determine whether sufficient wastewater treatment capacity exists for a proposed project. These CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.
- Require compliance with Mitigation Measure PUF-2(a), and MTC shall require implementation of Mitigation Measures PUF-2(b) and PUF-2(c), as feasible based on project- and site-specific considerations to reduce water usage and, subsequently, some wastewater flows.

Impact PUF-4: Insufficient Landfill Capacity. The Plan Bay Area EIR analyzed the potential impacts related to insufficient landfill capacity to serve new development while complying with applicable regulations and determined that, even with the implementation of Mitigation Measure PUF-4, the impact would be significant and unavoidable. As discussed in Impact UTIL-4, there would be adequate landfill capacity for the proposed project. Therefore, Mitigation Measure PUF-4 is not applicable (refer to Section 4.18.3, Project-Specific Analysis).

4.18.3 Project-Specific Analysis

Impact UTIL-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

AND

Impact UTIL-3: Result in a determination by the wastewater treatment provider, which serves or may serve the proposed project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact Analysis

Water

The project site is currently connected to the City's municipal water supply system. As shown in Table 2.2.-3 in Chapter 2, Project Description, the project site has a current water demand of 63,670 gallons per day (gpd), which would increase to 113,183 gpd under the proposed project for the residential component and the hotel component (Appendix A). This would represent a total increase in necessary water capacity by 49,513 gpd (or approximately 55.46 AFY) with the proposed project (Appendix A). The increase in water needed to support the proposed project would represent a less than 1 percent increase in the total capacity estimated. Refer to Impact UTIL-2 for a discussion of the proposed project's impacts on water supply.

The proposed project would require new lateral connections to the existing 6-inch waterline in Center Street, including fire, domestic, and irrigation. However, no upgrades or capacity increases are anticipated for the existing water main in Center Street. Although the increase in water would result in a less than 1 percent increase in the estimated water capacity of the City, Mitigation Measure UTIL-1 (PBA EIR MM PUF-1(a)), and Mitigation Measure UTIL-2 (PBA EIR MM PUF-2(a)) would be required to ensure that coordination with the City and SFPUC occurs to confirm that there would be sufficient capacity available to serve the proposed project. This coordination occurred during preparation of this SCEA, and it was determined that sufficient capacity exists, and the proposed project would not result in the relocation or construction of new or expanded facilities (Appendix A). Therefore, impacts would be less than significant with mitigation incorporated.

Wastewater

The proposed project would be served by the WPCP operated by the City. As shown in Table 2.2-4 in Chapter 2, Project Description, based on available wastewater generation factors, the proposed project would generate a combined 98,419gpd of wastewater, which would be an 43,054 gpd increase from existing conditions (Appendix A). The WPCP is designed for a dry-weather operation of 3 MGD, with a wet-weather peak capacity of 9 MGD. From February 2014 through June 2018, the WPCP treated a daily average of 1.5 MGD, with the highest reported average daily flow being 7.6 MGD (San Francisco Bay RWQCB 2019). Therefore, the WPCP had 1.5 MGD of unused permitted dry weather flow capacity in 2019. The proposed project would represent a less than 1 percent of the unused capacity for the WPCP. Actual generation rates would likely be lower due to water conservation measures such as CALGREEN, Title 24 of the CCR, and the City of Millbrae Model Water Efficient Landscape Ordinance. Additionally, the increase in wastewater generated from the proposed project would be accommodated in the existing 8-inch gravity main in Center Street, via a new connection to the line. However, no upgrades or capacity increase are anticipated for the existing sewer line in Center Street. Although the proposed project would result in a less than 1 percent increase in the wastewater treatment capacity of the WPCP, Mitigation Measure UTIL-2 (PBA EIR MM PUF-2(a)) and Mitigation Measure UTIL-3 (PBA EIR MM PUF-3) would be required to ensure that coordination with the WPCP occurs and that there would be sufficient capacity available to serve the proposed project. This coordination occurred during preparation of this SCEA, and it was determined that sufficient capacity exists, and the proposed project would not result in the

relocation or construction of new or expanded facilities (Appendix A). Therefore, impacts would be less than significant with mitigation incorporated.

Stormwater

The project site is currently served by the City's storm drain system and has 255,286 square feet of impervious surface and 38,520 square feet of pervious surface. The proposed project would create approximately 227,672 square feet of impervious surface. Therefore, the proposed project would result in a net decrease of approximately 27,614 square feet of impervious surface on the project site. The proposed project would comply with the C.3 requirements of the San Mateo County MRP and provide approximately 66,134 square feet of pervious surface consisting of bioretention basins and flow-through planters, which would collect and treat surface runoff prior to entering the piped storm drain system. The proposed project would connect to the existing 42-inch storm drain line in Center Street and would install approximately 500 feet of 12-inch reinforced concrete pipe along Center Street to tie into the City's existing storm drain system. As such, the proposed project would not require the construction of new stormwater drainage facilities and there would be sufficient stormwater capacity to serve the proposed project. Therefore, impacts would be less than significant.

Electricity, Natural Gas, and Telecommunications

The proposed project would connect to existing electrical infrastructure, underground overhead power lines running along Center Street, and remove the joint poles along Center Street along the project site frontage, thereby improving safety and the appearance of the street. New connections would be made to the existing natural gas lines in Center Street. The proposed project would include energy conservation features, including homes that are energy efficient, with a goal to exceed the state's current Title 24 requirements by meeting current Tier 2 Energy Efficiency standards. Furthermore, the proposed project would include 17 electric vehicle stalls and the infrastructure necessary to install charging stations. The proposed apartment complex would also be prepped for installation of rooftop solar panels. Energy supplies would come from PG&E, which would have sufficient capacity to serve the proposed project. The proposed project would also connect to existing telecommunication facilities. Therefore, impacts would be less than significant.

Level of Significance Before Mitigation

Potentially Significant Impact.

Mitigation Measures

Mitigation Measure UTIL-1 (PBA EIR MM PUF-1(a): Water and Wastewater Treatment Facilities); UTIL-2 (PBA EIR MM PUF-2(a): Water Supply); and UTIL-3 (PBA EIR MM PUF-3: Wastewater Treatment Capacity) are required.

Level of Significance After Mitigation

Less Than Significant Impact With Mitigation.

Impact UTIL-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact Analysis

Potable water is currently provided to the project site by the City and SFPUC. As shown in Table 2.2-3 in Chapter 2, Project Description, the project site has a current water demand of 63,670 gpd, which would increase to 113,183 gpd with the proposed project (Appendix A). This would represent a total increase in necessary water capacity by 49,513 gpd (or approximately 55.46 AFY) for the proposed project (Appendix A).

SB 610 requires cities and counties to confirm through a water supply assessment (WSA) that sufficient water supply sources are available before certain large developments are approved (California Water Code Sections 10910 through 10915). The WSA for a project must be included in that project's CEQA documentation. A WSA must be prepared if a project includes, among other things (1) the equivalent demand of 500 residential units; (2) a shopping center or business establishment that employs more than 1,000 persons or has a floor space of more than 500,000 square feet; or (3) a commercial office building that employs more than 1,000 persons or has a floor space of more than 250,000 square feet. A WSA is not required for the proposed project because the proposed project would result in 384 new residential units and an approximately 135,967-square-foot hotel, employing up to 90 full-time employees, which would be less than the 500 residential units, 1,000 persons or 250,000 square feet of floor space associated with a commercial office building use under SB 610. In addition, the future 200-room hotel would replace an existing 220-room hotel, resulting in less water use due to the reduction in guest rooms and more efficient water use due to construction of a new hotel building. Therefore, the proposed project would not meet any of the requirements for preparation of a WSA. According to the 2020 UWMP the total water supply available to the City is estimated to be approximately 4,238 AFY between 2025 and 2045 (City of Millbrae 2021). The increase in water needed to support the proposed project would, therefore, represent a less than 1 percent increase in the total capacity estimated.

However, as noted above, implementation of the Bay-Delta Plan Amendment would result in reduced SFPUC water deliveries to the City during dry years. For the City, the water supply reliability results indicated a potential SFPUC water supply shortfall of generally 38 percent in consecutive years of a multiple year dry period if the Bay-Delta Plan Amendment were not implemented and up to 64 percent in the third through fifth years of a multiple year dry period if the Bay-Delta Plan Amendment were implemented as it currently stands (City of Millbrae 2021).

Although the impact of the Bay-Delta Plan Amendment is severe, the City has a six-stage Water Shortage Contingency Plan, recently updated to align with the new Water Code requirements, which has triggering levels based on percent reductions in normal supply. These stages range in magnitude from less than 5% to over 50%, and include measures to help reduce water use, prohibit non-essential uses, and allocate available supplies to the uses deemed most critical. The City also maintains a comprehensive water conservation program, which includes a host of Demand Management Measures implemented by the City to improve water use efficiency. In addition, SFPUC is currently implementing projects to help mitigate the effects of the Bay-Delta Plan Amendment should it be implemented. These projects are further discussed in the 2020 UWMP.

As indicated above, without implementation of the Bay-Delta Plan Amendment, the City would generally have sufficient water supplies during normal and dry hydrologic conditions to meet the City's projected water demands, including the project's estimated water demand, in addition to the

City's existing and other planned future uses. With implementation of the Bay-Delta Plan Amendment, the City would need to implement its six-stage Water Shortage Contingency Plan and conservation measures. Therefore, the incremental increase in water consumption from the proposed project would be able to be served by existing and projected future supplies during normal, single dry years, and multiple dry years, and the impact would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact UTIL-4: 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?

Impact Analysis

Solid waste services within the City are provided by South San Francisco Scavenger Company, the firm franchised by the City to collect and dispose of refuse. The Scavenger Company also collects recyclables and yard trimmings at the curbside, along with food scraps. Waste collected from homes and businesses within the City is processed at Blue Line Transfer, Inc., a full-service public disposal and recycling Facility in South San Francisco. Material that cannot be recycled or composted is transferred to the Ox Mountain Sanitary Landfill near Half Moon Bay. The current permitted disposal acreage is 173 acres, with a closure date of the facility scheduled for 2034; a longer period of operation may be allowed pending renewal of the landfill's permit (CalRecycle 2019). The landfill has a remaining capacity of approximately 22.2 million cy and has a maximum permitted capacity to receive up to 3,598 tons per day.

The project site currently accommodates 23 residents, 220 hotel rooms, and 108 employees. Using the waste generation factor of 2.9 pounds per resident per day, 2 pounds per hotel room per day, and 11.5 pounds per employee per day, respectively, a total of approximately 319 tons of solid waste per year are currently generated at the project site, as shown in Table 4.18-1. Using the same factors, the proposed project would generate 1,048 residents, 200 hotel rooms and 90 employees, resulting in the generation of approximately 818 tons of solid waste per year, as shown in Table 4.18-2. As a result of new residential and increased hotel uses assumed by the proposed project, solid waste generated by the proposed project would be greater than what is currently generated. Table 4.18-2 shows that solid waste generated by the proposed project is estimated to be approximately 818 tons per year, which is 499 tons per year more than current uses (CalRecycle 2018, 2020).

Table 4.18-1. Existing Estimated Solid Waste Generation

Existing Component		Generation Rate	Pounds per Day	Tons per Day	Tons per year
Apartment Units	20 residents	2.9 (lbs/person/day)	58	0.029	10.58
Single-Family Residence	3 residents	2.9 (lbs/person/day)	8.7	0.004	1.46
Hotel Rooms	220	2 (lbs/room/day)	440	0.22	80
Hotel Employees	108	11.5 (lbs/employee/day)	1,242	0.621	227
Total	-	-	**1,749**	**0.874**	**319**

Note:
lbs = pounds
Source: CalRecycle 2018, 2020

Table 4.18-2. Proposed Estimated Solid Waste Generation

Project Component		Generation Rate	Pounds per Day	Tons per Day	Tons per year
Proposed Apartment Complex	1,048 residents	2.9 (lbs/person/day)	3,039	1.52	555
Proposed Apartment Complex Employees	4 employees	11.5 (lbs/employee/day)	46	0.023	8.40
Future Hotel Rooms	200	2 (lbs/room/day)	400	0.20	73
Future Hotel Employees	90 employees	11.5 (lbs/employee/day)	1,035	0.52	190
Total	**-**	**-**	**4,520**	**2.26**	**826.4**

Note:
lbs = pounds
Source: CalRecycle 2018, 2020

Solid waste from the project site would be transferred to the Ox Mountain Landfill in Half Moon Bay. As described above, the Ox Mountain Landfill is permitted to receive up to 3,598 tons of waste per day. Remaining capacity is approximately 22.2 million cy. Based on the Ox Mountain permitted intake of 3,598 tons per day, the increase in project-generated waste of 1.386 tons per day would represent approximately 0.038 percent of daily capacity. The actual percentage would probably be less as all hotel rooms would not be occupied daily, and employees would not likely work 365 days per year. The proposed project would also include recycling and green waste services as required by state and local objectives to reduce solid waste. Therefore, the proposed project contribution to solid waste facilities would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact UTIL-5: Comply with federal, state, and local statutes and regulations related to solid waste?

Impact Analysis

As the City continues to promote additional diversion, there is expected to be no adverse impact on meeting waste diversion goals as a result of implementation of the proposed project. Additional waste generated by the proposed project would likely be further offset by increased diversion, though even at existing rates it is expected that there is sufficient landfill capacity to meet demand.

In accordance with state mandates, cities and counties must reduce per capita waste disposal through source reduction, recycling, and composting activities. The proposed project would include onsite recycling, which would comply with federal, state, and local statutes. Therefore, impacts are anticipated to be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

4.19 Wildfire

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project;				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
c) 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?	☐	☐	☐	☒

4.19.1 Environmental Setting

Climate change is expected to increase the frequency and severity of wildfires in California by altering precipitation and wind patterns, changing the timing of snowmelt, and inducing longer periods of drought. 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. 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 (SRAs), which are managed by CAL FIRE. All incorporated areas and other unincorporated lands are classified as Local Responsibility Areas.

While all of California is subject to some degree of wildfire hazard, there are specific features that make certain areas more hazardous. CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors (PRC 4201-4204 and Government Code 51175-89). Factors that can increase an area's susceptibility to fire hazards include slope, vegetation type and condition, and atmospheric conditions. CAL FIRE has identified two types of wildland fire risk areas: 1) wildland areas that may contain substantial forest fire risks and hazards, and 2) very high fire hazard severity zones. Each risk area carries code requirements to reduce the potential risk of wildland fires. Under state regulations, areas within very high fire hazard risk zones must comply with specific building and vegetation management requirements intended to reduce property damage and loss of life within these areas.

There are no wildlands located within the city. According to CAL FIRE, there are no very high fire hazard severity zones within the Local Responsibility Area in proximity to the project site. Likewise,

there are no moderate, high, or very high fire hazard severity zones in the SRAs in the vicinity of the project site (CAL FIRE 2008).

4.19.2 Previous Environmental Analysis

4.19.2.1 City of Millbrae General Plan EIR Summary

The General Plan EIR did not address the issue of "wildfire" because it's publication in 1998 preceded adoption of the 2019 CEQA Appendix G Checklist Questions. Issues related to wildland fires are discussed in Chapter 8 of the General Plan EIR. According to the General Plan EIR, in 1998, steep and densely vegetated areas accounted for a large portion of Millbrae's total undeveloped acreage. Since then, much of the City has become developed areas, with extensive concrete and built-up areas that are not prone to wildfires (City of Millbrae 1998b). There are no General Plan policies related to wildfires that are relevant to the proposed project.

4.19.2.2 Plan Bay Area EIR Summary

Although the Plan Bay Area EIR does not contain a separate section for analyzing impacts related to wildfires, Chapter 3.9 of the Plan Bay Area EIR evaluated the potential impacts related to hazards (including wildfire risk) that may result from future development. The Plan Bay Area EIR determined that impacts related to wildfire would be significant and unavoidable even with implementation of Mitigation Measure HAZ-7. Mitigation Measure HAZ-7 is not applicable to the proposed project because it is not located in a state responsibility area, or a very high fire hazard severity zone (refer to Impact HAZ-7 in Section 4.8.3, Project-Specific Analysis).

4.19.3 Project-Specific Analysis

Impact WF-1: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: that is:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impact Analysis

The proposed project is not located in an SRA or a very high fire hazard severity zone (CAL FIRE 2008). The project site is in an urban area, surrounded by existing development, including buildings, roadways, and associated infrastructure. Although the area does contain some landscaping and a

few street trees, these are not considered wildland areas and would not pose a significant wildfire risk. The nearest wildland area is the San Francisco State Fish and Game Refuge, which is located approximately 1.5 miles west of the project site. Existing residences and roadways separate this park from the project site. Therefore, the proposed project would have a no impact related to wildfire risk.

Level of Significance Before Mitigation

No Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

No Impact.

4.20 Mandatory Findings of Significance

	Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Does the Project have the potential to 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, 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?	☐	☒	☐	☐
b)	Does the Project have impacts that are individually limited, but cumulative considerable? ("Cumulative 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)?	☐	☒	☐	☐
c)	Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Impact MFS-1: Does the Project have the potential to 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, 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?

AND

Impact MFS-3: Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Impact Analysis

As described in Section 4.3 Biological Resources, and Section 4.4, Cultural Resources, the proposed project would not 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, 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 with the implementation of the included mitigation measures. Therefore, the impact would be less than significant with mitigation incorporated.

Additionally, the proposed project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less-than-significant levels through the implementation of the applicable mitigation measures identified in Sections 4.2, Air Quality; 4.6, Geology and Soils; 4.8, Hazards and Hazardous Materials; 4.9,

Hydrology and Water Quality; 4.12, Noise; 4.15, Recreation; 4.16, Transportation; 4.17, Tribal Cultural Resources and utilities and service systems;. Therefore, the impact would be less than significant with mitigation.

Impact MFS-2: Does the Project have impacts that are individually limited, but cumulative considerable? ("Cumulative 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)?

Impact Analysis

A cumulative impact is one that results from the combined effects of past, present, and reasonably foreseeable future projects or activities. CEQA requires the disclosure of cumulative impacts to which the proposed project would contribute, and the importance of that contribution in the context of the cumulative impact. The Master EIR for the City of Millbrae 1998 General Plan and the 2050 Plan Bay Area EIR evaluated cumulative impacts associated with anticipated growth and development in the City as land use and zoning assumptions and in the Plan Bay Area process as PDAs. This SCEA's project-level cumulative impact analysis tiers off of both the City of Millbrae Master EIR for the 1998 General Plan and the 2050 Plan Bay Area EIR. Therefore, the only way the proposed project could result in a new cumulative impact would be from a new source of impact that was not previously identified in either the Master EIR for the 1998 General Plan or the 2050 Plan Bay Area EIR. Because this SCEA is required to use previously identified mitigation measures from the 1998 General Plan and/or the 2050 Plan Bay Area EIRs, only new project impacts that resulted in the need for a new project-specific mitigation measure, should be considered as contributing to the cumulative context of resource impacts. Both the 1998 General Plan and the 2050 Plan Bay Area EIR identified potentially significant impacts and prescribed mitigation to reduce them to a less-than-significant level. The 1998 General Plan documented significant and unavoidable cumulative impacts for transportation and circulation. Additionally, the 2050 Plan Bay Area EIR documented significant and unavoidable cumulative impacts related to air quality, land use and physical development, biological resources, public utilities and facilities, and public services and recreation.

As discussed in this SCEA, the proposed project would result in less-than-significant impacts related to land use, public utilities, and public services. The proposed project would also result in less-than-significant impacts related to air quality with the implementation of Mitigation Measure AIR-1 (PBA EIR MM AQ-2), which was previously identified in the 2050 Plan Bay Area EIR. Therefore, the proposed project would not contribute to a significant cumulative impact related to these topics identified in the 2050 Plan Bay Area EIR. As discussed below, project-specific mitigation measures were identified for biological resources, recreation, and transportation to reduce impacts to less-than-significant levels.

The proposed project was evaluated to determine if the incremental contribution from new impacts would contribute to a cumulative impact as identified in the Master EIR for the 1998 General Plan and 2050 Plan Bay Area EIR. For the proposed project, the only resources identified that would cause a need for a project-specific mitigation measure, thus needing to be evaluated, are the following: biological resources, geology and soils, hydrology and water quality, noise, recreation, and transportation.

As discussed in Section 4.3, Biological Resources, impacts on nesting birds and roosting bats would be limited to the construction phase, which is limited in duration and is geographically isolated to the project site and adjacent parcels, and would be reduced to a less-than-significant level with implementation of Mitigation Measures BIO-1 and BIO-2. Therefore, the proposed project would not contribute to a cumulative impact.

Impacts related to geology, hazards, hydrology and water quality, noise, and transportation would be reduced with implementation of Mitigation Measures GEO-1 (Implement Geotechnical Design Recommendations), GEO-2 (Prepare and Implement Dewatering and Shoring Plans), HYD-1 (Prepare and Implement a SWPPP), NOI-4 (Railroad Noise Reduction), TRANS-1 (Construction Traffic), and TRANS-2 (Driveway Distance). These mitigation measures are specific to the conditions of the project site and project design and/or are limited to the construction phase. Therefore, project impacts would be less than significant and would not contribute to a significant cumulative impact.

Impacts related to recreation would be reduced with implementation of Mitigation Measure REC-1 (Payment of Fees for Park Maintenance). This mitigation measure was developed to ensure that the proposed project contributes its fair share towards maintaining existing parkland in the city. Therefore, project impacts would be less than significant and would not contribute to a significant cumulative impact.

As all the resources and project-specific mitigation measures discussed above are specific to the conditions of the project site, project design, proportional to the project, and/or are limited to the construction phase, this greatly limits the project impacts' ability to contribute to a larger cumulative context that could result in a significant cumulative impact. Therefore, potential impacts associated with the proposed project would not increase the severity of any of the cumulatively considerable impacts from the levels identified and analyzed in the Master EIR for the 1998 General Plan and the 2050 Plan Bay Area EIR. The proposed project would result in a less-than-significant cumulative impact with implementation of the project-specific mitigation measures and/or applicable mitigation measures previously identified in the 2050 Plan Bay Area EIR.

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Chapter 5
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