

4. Environmental Analysis

This chapter of the Draft Environmental Impact Report (Draft EIR) is made up of 14 sub-chapters which evaluate the direct, indirect, and cumulative environmental impacts of the proposed Project. In accordance with Appendix F (Energy Conservation) and Appendix G (Environmental Checklist) of the California Environmental Quality Act (CEQA) Guidelines, the potential environmental effects of the proposed Specific Plan Update and the proposed TOD #1 and TOD #2 projects (i.e. the proposed Project) are analyzed for the following environmental issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology, Soils, and Seismicity
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation and Traffic
- Utilities and Service Systems

FORMAT OF THE ENVIRONMENTAL ANALYSIS

Each sub-chapter is organized into the following sections:

- **Environmental Setting** provides an overview of federal, State, regional and local laws and regulations relevant to each environmental issue, together with a description of the existing environmental conditions, providing a baseline against which the impacts of the proposed Project can be compared.
- **Standards of Significance** refers to the quantitative or qualitative standards or conditions used to compare the existing setting with and without the proposed Project to determine whether the impact is significant. These standards are based primarily on the CEQA Guidelines, and may reflect established health standards, ecological tolerance standards, public service capacity standards, and guidelines established by agencies or experts.

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- **Impact Discussion** gives an overview of potential impacts of the proposed Project and explains why impacts were found to be significant or less than significant prior to mitigation. This subsection also includes a discussion of cumulative impacts of the proposed Project. Impacts and mitigation measures are numbered consecutively within each topical analysis and begin with an acronymic or abbreviated reference to the impact section. The following symbols are used for individual topics:
 - AES – Aesthetics
 - AQ – Air Quality
 - BIO – Biological Resources
 - CULT – Cultural Resources
 - GEO – Geology, Seismicity, and Soils
 - GHG – Greenhouse Gas Emissions and Sustainability
 - HAZ – Hazards and Hazardous Materials
 - HYDRO – Hydrology and Water Quality
 - LU – Land Use
 - NOISE – Noise
 - POP – Population and Housing
 - PS – Public Services and Recreation
 - TRANS – Transportation and Circulation
 - UTIL – Utilities and Service Systems

LEVELS OF SIGNIFICANCE

As noted above, the significance criteria are identified before the impact discussion subsection, under the subsection, “Standards of Significance.” For each impact identified, a level of significance is determined using the following classifications:

- *Significant* (S) impacts describe effects that exceed an established or defined threshold.
- *Less-than-significant* (LTS) impacts describe effects that are noticeable, but do not exceed established or defined thresholds, or are mitigated below such thresholds.
- *No impact* describes the circumstances where there is no adverse effect on the environment.

For each impact identified as being significant, the EIR provides mitigation measures to reduce, eliminate, or avoid the adverse effect. If the mitigation measures would reduce the impact to a less-than-significant level successfully, this is stated in the EIR. However, *significant and unavoidable* (SU) impacts are described where mitigation measures would not diminish these effects to less-than-significant levels.

CUMULATIVE IMPACT ANALYSIS

A cumulative impact consists of an impact created as a result of the combination of the project evaluated in the EIR, together with other reasonably foreseeable impacts not caused by the proposed Project. Section 15130 of the CEQA Guidelines requires an EIR to discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." Used in this context, cumulatively considerable means that the incremental effects of an individual 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.

Where the incremental effect of a project is not "cumulatively considerable," a Lead Agency need not consider that effect significant, but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. Where the cumulative impact caused by the project's incremental effect and the effects of other reasonably foreseeable projects is not significant, the EIR must briefly indicate why the cumulative impact is not significant.

The cumulative impacts discussions in Chapters 4.1 through 4.14 explain the geographic scope of the area affected by each cumulative effect (e.g. immediate project vicinity, city, county, watershed, or air basin). The geographic area considered for each cumulative impact depends upon the impact that is being analyzed. For example, in assessing aesthetic impacts, the pertinent geographic study area is the vicinity of the areas of new development under the proposed Project from which the new development can be publicly viewed and may contribute to a significant cumulative visual effect. In assessing macro-scale air quality impacts, on the other hand, all development within the air basin contributes to regional emissions of criteria pollutants, and basin-wide projections of emissions is the best tool for determining the cumulative effect.

Section 15130 of the CEQA Guidelines permits two different methodologies for completion of the cumulative impact analysis:

- The 'list' approach permits the use of a list of past, present, and probable future projects producing related or cumulative impacts, including projects both within and outside the city; and
- The 'projections' approach allows the use of a summary of projections contained in an adopted plan or related planning document, such as a regional transportation plan, or in an EIR prepared for such a plan. The projections may be supplemented with additional information such as regional modeling.

This EIR uses the projections approach and takes into account growth from the proposed Project within the Millbrae city boundary and Sphere of Influence (SOI), in combination with impacts from projected growth in the rest of Santa Mateo County and the surrounding region, as forecast by the Association of Bay Area of Governments (ABAG). In each section of Chapter 4, the cumulative impacts discussion is based on the cumulative development described in Chapter 6, CEQA-Mandated Assessments, of this Draft EIR. The following provides a summary of the cumulative impact scope for each impact area:

- **Aesthetics:** The cumulative setting for visual impacts includes potential future development under the proposed Project combined with effects of development on lands adjacent to the Specific Plan Area within the city.

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- **Air Quality:** Cumulative air quality impacts could occur from a combination of the proposed Project combined with regional growth within the San Francisco Bay Area Air Basin.
- **Biological Resources:** The geographic scope of the cumulative analysis for biological resources considers the 5-mile radius surrounding the Specific Plan Area.
- **Cultural Resources:** Cumulative impacts to cultural resources could occur from development planned for under the proposed Project and the regional vicinity of Millbrae.
- **Geology, Soils, and Seismicity:** Potential cumulative geological impacts could arise from a combination of the development of the proposed Project together with future development in the immediate vicinity of the adjoining jurisdictions.
- **Greenhouse Gas Emissions:** The cumulative impact analyses for greenhouse gas (GHG) emissions is related to the ongoing development in Millbrae and the entire region. Because GHG emissions are not confined to a particular air basin but are dispersed worldwide, the cumulative analysis focuses on the global impacts.
- **Hazards and Hazardous Materials:** This chapter analyzes potential cumulative hazardous impacts that could arise from a combination of the development of the proposed Project together with the regional growth in the immediate vicinity of the Specific Plan Area.
- **Hydrology and Water Quality:** The geographic context used for the cumulative assessment of water quality and hydrology impacts is the Millbrae Creek Watershed and the Green Hills Creek Watershed, which encompasses the entire Specific Plan Area.
- **Land Use and Planning:** The geographic context for the cumulative land use and planning effects occur from potential future development under the General Plan combined with effects of development on lands adjacent to the Specific Plan Area within the San Francisco International Airport area to the east, the City of Burlingame to the south.
- **Noise:** The analysis addresses the operational and construction noise and vibration impacts of the proposed Project on the noise environment in the Specific Plan Area and the surrounding area. The traffic noise levels are based on cumulative traffic conditions that take into account cumulative development in the region.
- **Population and Housing:** Impacts from cumulative growth are considered in the context of their consistency with regional planning efforts.
- **Public Services and Recreation:** Cumulative impacts are considered in the context of the growth from development under the proposed Project within the city combined with the estimated growth in the service areas of each service provider.
- **Transportation and Circulation:** The analysis of the proposed Project addresses cumulative impacts to the transportation network in Millbrae and the surrounding area. Projected 2040 traffic impacts at Project buildout are calculated using data from the City and neighboring jurisdictions regarding recently approved projects, approved-but-not-constructed projects and future projects. These data are used to generate trips using industry-standard trip rates and the trips are manually assigned to the transportation network. This traffic assignment is used as the basis for cumulative traffic and is refined for growth in Millbrae under the proposed Project. The projected 2040 vehicle miles at Project buildout are calculated using data from Santa Clara Valley

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Transportation Authority's (VTA)- City/County Association of Governments of San Mateo County (C/CAG) Travel Demand Forecast model, which incorporates county and regional growth projections from ABAG; these data were then adjusted to account for growth in Millbrae under the proposed Project.

- **Utilities and Service Systems:** Cumulative impacts are considered in the context of the growth from development under the proposed General Plan within the city combined with the estimated growth in each utility's service area.

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