

**APPENDIX A:**  
**NOTICE OF PREPARATION AND SCOPING COMMENTS**







# NOTICE OF PREPARATION ENVIRONMENTAL IMPACT REPORT CITY OF MILLBRAE

DATE: September 19, 2014

TO: State Clearinghouse  
State Responsible Agencies  
State Trustee Agencies  
Other Public Agencies  
Interested Organizations

FROM: Marty Van Duyn  
Community Development Project Manager  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030

SUBJECT: Notice of Preparation (NOP) of the Draft Environmental Impact for the Millbrae Station Area Specific Plan Update and Millbrae Transit-Oriented Development (TOD) Projects

LEAD AGENCY/SPONSOR: City of Millbrae Community Development Department

PROJECT TITLE: Millbrae Station Area Specific Plan Update

This NOP has been prepared for the EIR for the Millbrae Station Area Specific Plan Update, the Millbrae TOD #1 project, and the Millbrae TOD #2 project, herein referred to as "Project" or "proposed Project". The City of Millbrae (City) is the Lead Agency for the preparation of an EIR for the proposed Project. The determination to prepare an EIR was made by the City. This NOP is prepared in compliance with Section 15802 of the California Environmental Quality Act (CEQA) Guidelines. The City is soliciting comments on the scope and content of the EIR. The City will prepare one single EIR to address the environmental impacts associated with the broad policies of the Millbrae Station Area Specific Plan (Specific Plan) at a programmatic level and the environmental impacts associated with the two Millbrae TOD projects at a project level. The programmatic portion of the EIR will tend to be more qualitative in nature than the project-specific quantitative portion of the EIR. The proposed Project, its location and potential environmental effects are described below.

Members of the public and public agencies are invited to provide comments in writing as to the scope and content of the EIR. The City needs to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed Project. Your agency will need to use the EIR prepared by the City when considering your permits or other approvals for the Project.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but no later than the close of the 30-day NOP review period at 5:00 p.m. on October 19, 2014. A Scoping Meeting will be held on Tuesday, September 30, 2014 at the Millbrae Library, 1 Library Avenue, Millbrae, CA 94030.

Please send your comments to Marty Van Duyn, Community Development Project Manager, at the Community Development Department, 621 Magnolia Avenue, Millbrae, CA or email to [mvanduyn@ci.millbrae.ca.us](mailto:mvanduyn@ci.millbrae.ca.us) with "Millbrae Station Area Specific Plan Update EIR" as the subject. Please include a contact person for your agency.

Name: Marty Van Duyn, Community Development Project Manager

Signature: 

NOP – Millbrae Station Area Specific Plan Update EIR

September 19, 2014

## **1. Project Location, Description and Objectives**

This section describes the location, Project description, and objectives of the proposed Project.

### **PROJECT LOCATION**

As shown on Figure 1, Millbrae is located on the San Francisco peninsula, bordered by San Bruno to the north, San Francisco International Airport (SFO) and the San Francisco Bay to the east, Burlingame to the south, and the San Andreas Lake and Interstate 280 to the west. The Millbrae Station Area Specific Plan area (Plan Area) is located in the southeast corner of the city.

### **PROJECT DESCRIPTION & OBJECTIVES**

#### **a. Millbrae Station Area Specific Plan Update**

The City is undertaking a process to update the Specific Plan, which was initially developed and adopted in 1998, and supporting EIR. The Specific Plan, a programmatic document, would guide future public improvements and private development in the Plan Area over the next 25 years. The Specific Plan would re-establish a vision and framework for new development as a means to provide economic development to Millbrae and improve the quality of life of its residents. It is envisioned that the Plan Area would be developed with a mix of residential, office, hotel, and retail uses, with complementary open space. Approval of the Specific Plan will require amendments to the City's General Plan to ensure consistency between the two plans.

As shown in Figure 2, the Plan Area is approximately 116 acres in area (inclusive of existing roadways) and is generally bounded by Broadway to the west, Victoria Avenue and the Highline Canal limit it to the north, the Highway 101 interchange to the east, and the City of Burlingame to the south.

Buildout of the Specific Plan would result in approximately 1,653,000 square feet of office, 275,000 square feet of retail space, 1,750 residential units, and 360 hotel rooms.

Consistent with Section 15168 of the CEQA Guidelines a program-level EIR will be prepared to analyze the potential impacts of adopting and implementing the Specific Plan for the Plan Area, along with accompanying General Plan amendments. The Specific Plan will seek to accomplish the following objectives:

- Update and define the vision for the future of the Plan Area
- Create goals and policies intended to facilitate achievement of the vision
- Designate land for uses that implement the vision
- Update development standards for the form and physical design of new development within the Plan Area
- Provide recommendations for circulation and physical improvement required to support future buildout of the Plan Area
- Provide an implementation strategy and conceptual financing plan for achieving the goals in the Specific Plan

#### **b. Millbrae TOD #1 Project**

The Millbrae TOD #1 project proposes new mixed-use development on the Millbrae Serra Station properties, which are located immediately west of the Millbrae BART/Caltrain Station (Millbrae Station), east of Serra Avenue and El Camino Real, south of the northern boundary of the Millbrae Station Area Specific Plan (MSASP), and north of Linden Avenue. The Millbrae TOD #1 project proposes a mix of uses, including office, retail, residential, underground parking, a plaza, and an enclosed galleria retail corridor connecting Serra Avenue to the Millbrae Station platform. The Millbrae TOD #1 project would result in approximately 270,000 square feet of office, 32,000 square feet of retail space, and 500 residential units at buildout.

Consistent with Section 15161 of the CEQA Guidelines a project-level EIR will be prepared to analyze the potential impacts of constructing and operating the Millbrae TOD #1 project.

c. Millbrae TOD #2 Project

The Millbrae TOD #2 project proposes a mixed-use project for the BART-owned site, which is located immediately east of the Millbrae Station, south of the Highline Canal, west of Aviador Avenue, and north of Millbrae Avenue. This project would result in approximately 165,000 square feet of office, up to 47,000 square feet of retail space, 320 residential units, and 120 hotel rooms at buildout. This project also proposes a new surface parking lot for BART passengers on a parcel that is currently used as the City's storage yard, located north of the Highline Canal and south of the Bayside Manor neighborhood. In addition, two bridges over the Highline Canal (one for pedestrians and the other for vehicles) are proposed to connect the BART site to the proposed surface parking lot. In addition, the Millbrae TOD #2 project would relocate the bus intermodal facility and BART's existing surface parking spaces.

Consistent with Section 15161 of the CEQA Guidelines a project-level EIR will be prepared to analyze the potential impacts of constructing and operating the Millbrae TOD #2 project and relocating the bus intermodal facility and BART's existing surface parking spaces.

## **2. Public Agency Approvals**

The proposed Project would require adoption by the Millbrae City Council. The Planning Commission and other decision-making bodies would review the proposed Project and make recommendations to City Council. While other agencies may be consulted during the General Plan amendment process, their approval is not required for Project adoption. However, subsequent development under the General Plan Amendment and Rezoning may require approval of State, federal and responsible trustee agencies that may rely on the programmatic EIR for decisions in their areas of expertise.

For the two Millbrae TOD projects, outside agencies would need to provide approvals and permits.

The EIR will evaluate the impacts related to the issuance of the following land use permits from the City of Millbrae:

- Certification of EIR
- General Plan Amendment
- Rezoning approval
- Specific Plan approval
- Development Agreement approval
- Design Review approval
- Grading permits
- Building permits
- Subdivision Map

This Project will also require a number of approvals from other agencies that will require attention in the EIR, including, but not limited to:

- San Francisco Regional Water Quality Control Board for approval of permits relating to water quality
- California Department of Fish and Wildlife
- City/County of Association of Governments (C/CAG)
- Federal Aviation Administration (FAA)
- Caltrain
- Bay Area Rapid Transit (BART)
- United States Army Corps of Engineers (if wetlands or other waters of the U.S. are impacted)

### **3. Environmental Factors Potentially Affected**

The proposed Project could potentially affect the following environmental factors and each will be addressed in the EIR:

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

The following topics are likely to be associated with less-than-significant impacts and are not expected to be evaluated in detail in the EIR:

- Agriculture and Forestry Resources
- Mineral Resources.

### **4. ATTACHMENTS:**

Figure 1: Regional Context

Figure 2: Project Boundaries

**City of Millbrae  
Millbrae Station Area Specific Plan Update EIR**

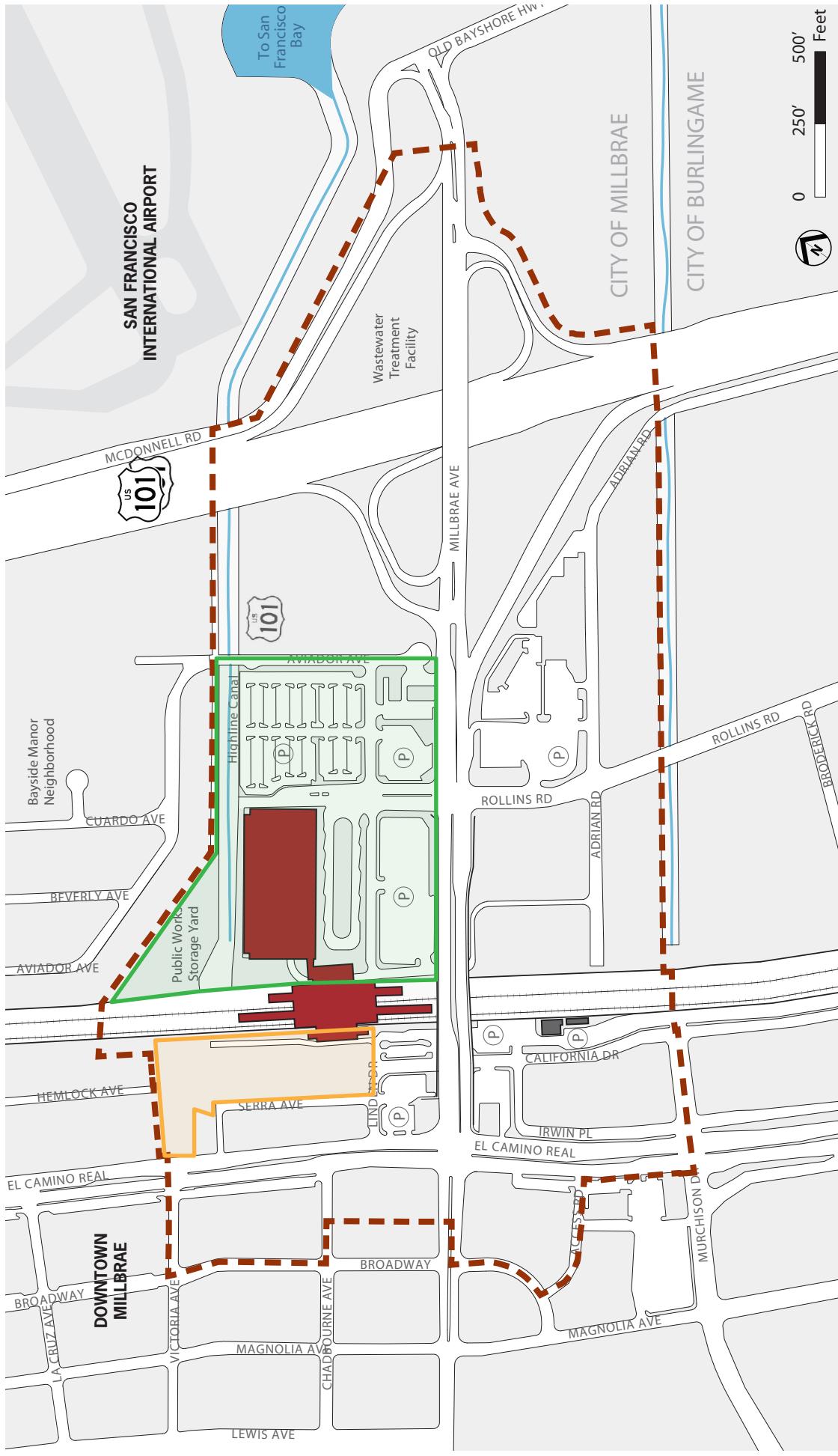
**Notice of Preparation**



City of Millbrae  
Millbrae Station Area Specific Plan (MSASP)

**FIGURE 1: REGIONAL CONTEXT**

**City of Millbrae**  
**Millbrae Station Area Specific Plan Update EIR**  
 Notice of Preparation



- Plan Area Boundary
- Millbrae BART/Caltrain Station & Parking Structure
- Railroad
- Millbrae TOD #2 Project Boundary
- Millbrae TOD #1 Project Boundary

**FIGURE 2: PROJECT BOUNDARIES**



# NOTICE OF PREPARATION ENVIRONMENTAL IMPACT REPORT CITY OF MILLBRAE

DATE: October 23, 2014

TO: State Clearinghouse  
State Responsible Agencies  
State Trustee Agencies  
Other Public Agencies  
Interested Organizations

FROM: Marty Van Duyn  
Community Development Project Manager  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030

SUBJECT: Notice of Preparation (NOP) of the Draft Environmental Impact for the Millbrae Station Area Specific Plan Update and Millbrae Transit-Oriented Development (TOD) Projects Comment Period Time Extension

LEAD AGENCY/SPONSOR: City of Millbrae Community Development Department

PROJECT TITLE: Millbrae Station Area Specific Plan Update

On September 19, 2014 the City of Millbrae, acting as the Lead Agency, issued the NOP of the EIR for the Millbrae Station Area Specific Plan Update, the Millbrae TOD #1 project, and the Millbrae TOD #2 project, herein referred to as "Project" or "proposed Project." In the interests of the citizens of Millbrae and all interested parties the City of Millbrae is extending the comment period of this NOP to 5:00 p.m. on Monday, November 24, 2014.

Note the boundary of the proposed Project as shown on the September 19<sup>th</sup> NOP has been slightly revised to show the precise boundary of the Project Study Area. No other aspects of the proposed Project have changed as a result of this revision.

The City is soliciting comments on the scope and content of the EIR. The City will prepare one single EIR to address the environmental impacts associated with the broad policies of the Millbrae Station Area Specific Plan (Specific Plan) at a programmatic level and the environmental impacts associated with the two Millbrae TOD projects at a project level. The programmatic portion of the EIR will tend to be more qualitative in nature than the project-specific quantitative portion of the EIR. The proposed Project, its location and potential environmental effects are described below.

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Name: Marty Van Duyn, Community Development Project Manager

Signature: Marty Van Duyn

NOP – Millbrae Station Area Specific Plan Update EIR

October 23, 2014

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Figure 2: Project Boundaries

**City of Millbrae  
Millbrae Station Area Specific Plan Update EIR**

**Notice of Preparation**



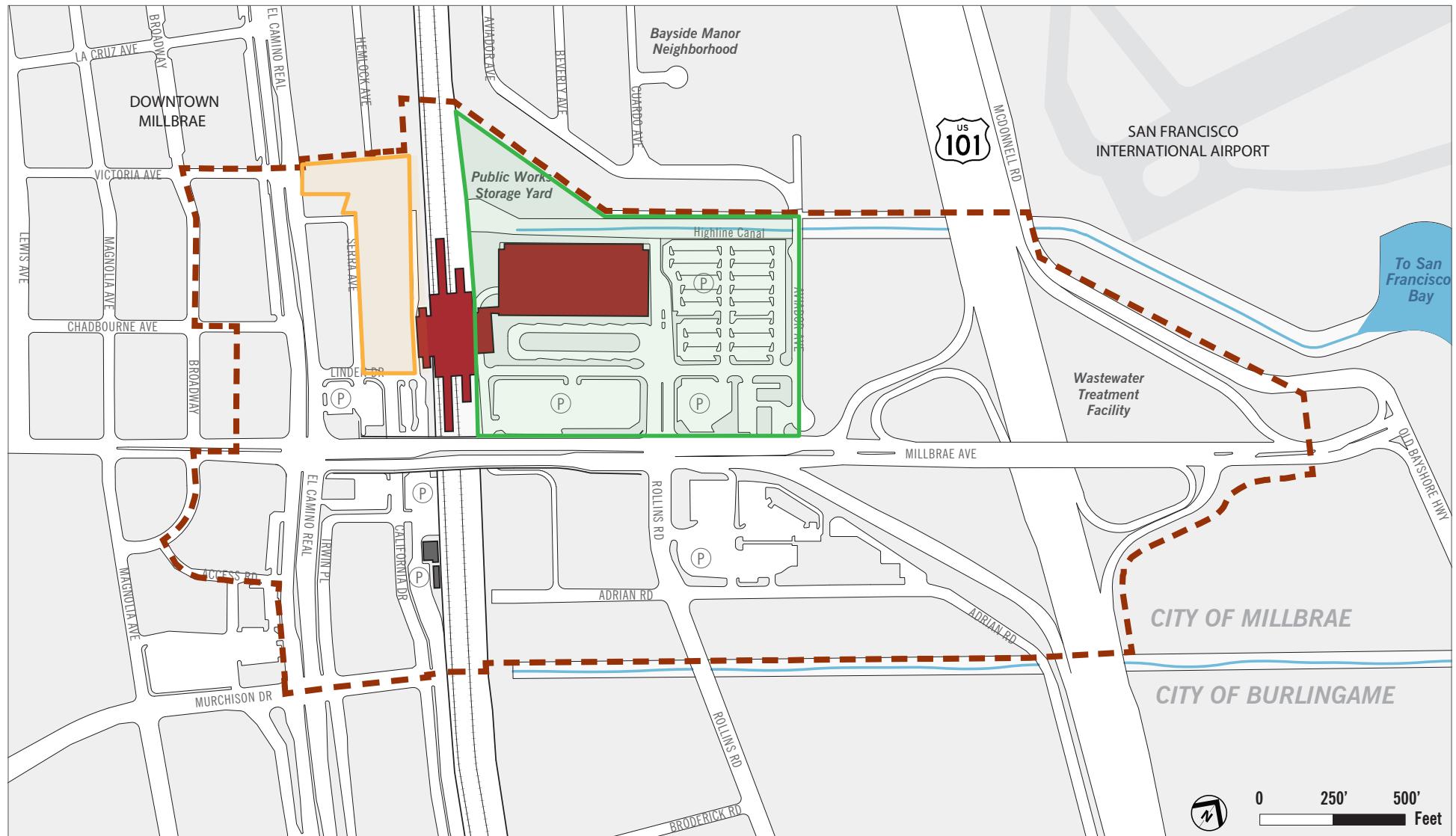
 City of Millbrae

 Millbrae Station Area Specific Plan (MSASP)

**FIGURE 1: REGIONAL CONTEXT**

City of Millbrae  
Millbrae Station Area Specific Plan Update EIR

Notice of Preparation



- Plan Area Boundary
- Millbrae BART/Caltrain Station & Parking Structure
- Railroad
- Millbrae Transit-Oriented Development (TOD) #1 Project Boundary
- Millbrae TOD #2 Project Boundary

**FIGURE 2: PROJECT BOUNDARIES**

***Comments Received on the Notice of Preparation for the Millbrae Station Area Specific Plan and  
Transit Oriented Developments #1 and #2 Project in the City of Millbrae***

#	COMMENTOR NAME AND ADDRESS	Project Description																		SUMMARY OF COMMENT	
		Aesthetics	Agriculture and Forestry	Air Quality	Biological Resources	Cultural Resources	Geology / Soils	Greenhouse Gas Emissions	Hazards / Hazardous Materials	Hydrology / Water Quality	Land Use and Planning	Mineral Resources	Noise	Population / Housing	Public Services	Recreation	Transportation / Traffic	Utilities / Service Systems	Construction Impacts	Alternatives	Other
<i><b>Verbal Comments from September 30, 2014 Scoping Meeting</b></i>																					
	Various commenters							•		•				•		•			•	Concerned about hotels, parking, transportation, bike and pedestrian access, types of retail, climate change adaptation, schedule of EIR, energy, crime and public services.	
<i><b>Written Comment Received between September 19, 2014 and December 1, 2014</b></i>																					
1	Ann Schneider 406 Palm Avenue Millbrae, CA 94030 (650) 697-6249 SchneiderAnn@juno.com September 30, 2014							•		•									•	Voices concern for lack of fiscal analysis, skepticism that financial analysis will say a hotel is necessary, and that no changes have been made to El Camino Real. Addresses: "Climate Adaptation; Deconstruction of Bldg Scheduled for demolition; safe + pleasant pedestrian bicycle areas."	
2	Janet Creech 939 Helen Drive Millbrae, CA 94030 (650) 624-9929 jntcreech@gmail.com September 30, 2014							•								•		•	•	Requests buildings to be energy efficient and produce their own energy with photovoltaic panels. Reminds that Millbrae is mandated by the state to reduce GHG levels by 15% from 2005 levels by 2015.	

<i>Comments Received on the Notice of Preparation for the Millbrae Station Area Specific Plan and Transit Oriented Developments #1 and #2 Project in the City of Millbrae</i>																								
#	<b>COMMENTOR NAME AND ADDRESS</b>		<b>SUMMARY OF COMMENT</b>																					
			Project Description	Aesthetics	Agriculture and Forestry	Air Quality	Biological Resources	Cultural Resources	Geology / Soils	Greenhouse Gas Emissions	Hazards / Hazardous Materials	Hydrology / Water Quality	Land Use and Planning	Mineral Resources	Noise	Population / Housing	Public Services	Recreation	Transportation / Traffic	Utilities / Service Systems	Construction Impacts	Alternatives	Other	Requests to be Notified
3	Dan Rogers 1101 Chadbourne Avenue Millbrae, CA 94030 (650) 697-1655 Drogers939@aol.com September 30, 2014																						Requests an equal proportion of development rights for Peter's Café and adjacent property to develop on their site. Requests any Site 1 parking garage to be subsidized by development #2 and that this garage be accessible from Victoria Avenue.	
4	Vincent A. Muzzi, Esq. 1818 Gilbreth Road, Suite 123 Burlingame, CA 94010 (650) 692-5406 vince@vmuzzi.com October 1, 2014		•								•		•			•		•					Requests parking time limitations along Millbrae Avenue from west of Lewis Avenue to Laurel Avenue; for estimated parking demand to be included in traffic analysis; for a publically funded west side garage along the El Camino Frontage; to make sure plan will accommodate any heights that the FAA/ALUC may approve during the plan's 20 year life; and to use form-based planning of multiple mixed uses. Allow for the plan to permit development agreements for projects over up to at least a 10 year term.	

#		COMMENTOR NAME AND ADDRESS		Comments Received on the Notice of Preparation for the Millbrae Station Area Specific Plan and Transit Oriented Developments #1 and #2 Project in the City of Millbrae																			
				Project Description	Aesthetics	Agriculture and Forestry	Air Quality	Biological Resources	Cultural Resources	Geology / Soils	Greenhouse Gas Emissions	Hazards / Hazardous Materials	Hydrology / Water Quality	Land Use and Planning	Mineral Resources	Noise	Population / Housing	Public Services	Recreation	Transportation / Traffic	Utilities / Service Systems	Construction Impacts	Alternatives
5		Marc Pfenninger AIA, LEEP AP Studios Architecture 405 Howard Street, Suite 488 San Francisco, CA 94105 (415) 732-5317 mpfenninger@studios.com October 8, 2014		•																			Propose the remainder of the general plan area study a height limit increase to maximum allowed by the FAA. Request height limit for Millbrae Serra Station Area (Site 1) be studied in the EIR process with a height that exceeds the FAA limit of 122 to 144 feet AMSL due to an ongoing application to the FAA for development to exceed current limits by up to 30 feet; and for EIR process evaluate these height limits for Site 1.
6		Kevin Gardiner City of Burlingame 501 Primrose Road Burlingame, CA 94010 (650) 588-7250 kgardiner@burlingame.org October 8, 2014				•												•			•		Requests traffic and air quality analysis to also include effects in the City of Burlingame. Lists current developments underway in North Burlingame and requests they be considered as part of any relevant analysis.
7 & 16		April Chan SamTrans/ CalTrain 1250 San Carlos Avenue San Carlos, CA 94070 (650) 508-6200 October 17, 2014 November 21, 2014																•	•	•	•	•	Requests to be included in all steps conducive to the completion of the EIR. Requests correction of TOD Site #1 on NOP project map so borders do not encroach on station facilities.

<i>Comments Received on the Notice of Preparation for the Millbrae Station Area Specific Plan and Transit Oriented Developments #1 and #2 Project in the City of Millbrae</i>																								
#	<b>COMMENTOR NAME AND ADDRESS</b>		<b>SUMMARY OF COMMENT</b>																					
			Project Description	Aesthetics	Agriculture and Forestry	Air Quality	Biological Resources	Cultural Resources	Geology / Soils	Greenhouse Gas Emissions	Hazards / Hazardous Materials	Hydrology / Water Quality	Land Use and Planning	Mineral Resources	Noise	Population / Housing	Public Services	Recreation	Transportation / Traffic	Utilities / Service Systems	Construction Impacts	Alternatives	Other	Requests to be Notified
8, 14 & 17	Gladwyn d'Souza, David Crabbe Sierra Club – Loma Prieta Chapter 3921 East Bayshore Road #240 Palo Alto, CA 94303 (650) 390-8411 October 17, 2014 November 20, 2014 November 24, 2014			•									•		•		•			•		Request to consider the MSASP separate from the Urban Republic and Serra Properties proposals. Has concerns with pedestrian safety, housing density, parking, community benefits, and bus convenience on El Camino Real. Recommends and undercrossing at East Millbrae Avenue and bike lanes. Also, includes questions why the Lucky/Walgreens site on Murchinson Drive was not included in the MSASP, and if future sea level rise will affect development. Requests to establish design criteria to support environmental energy and resource efficiency.		
9	Adina Levin Friends of CalTrain Peninsula Transportation Alternatives (650) 646-4344 aldeivnian@gmail.com October 19, 2014												•		•							Requests easier pedestrian access between the El Camino Real Crossing and the Station Area, and to include vehicle trip and mode share goals for the station area.		

<i>Comments Received on the Notice of Preparation for the Millbrae Station Area Specific Plan and Transit Oriented Developments #1 and #2 Project in the City of Millbrae</i>																								
#	<b>COMMENTOR NAME AND ADDRESS</b>		<b>SUMMARY OF COMMENT</b>																					
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10	Katy Sanchez Native American Heritage Commission 1550 Harbor Boulevard, Room 100 West Sacramento, CA 95691 (916) 373-3710 November 3, 2014							•															Provides recommendations to adequately assess and mitigate project-related impacts to archaeological resources.	
11	Erik Alm, AICP California Department of Transportation, District 4 111 Grand Avenue P.O. Box 23660, MS-10D Oakland, CA 94623 (510) 286-6053 November 4, 2014							•			•						•					•	Encourages coordination with CalTrans in preparation of the Traffic Impact Study, outlines elements that should be included in the Traffic Impact Study. Encourage development to facilitate walking, biking, and mass transit. Requires EIR to include documentation of a current archaeological record search. Requires an encroachment permit for work that encroaches onto the state right of way.	

#		Comments Received on the Notice of Preparation for the Millbrae Station Area Specific Plan and Transit Oriented Developments #1 and #2 Project in the City of Millbrae																							
		Commentor Name and Address		Project Description	Aesthetics	Agriculture and Forestry	Air Quality	Biological Resources	Cultural Resources	Geology / Soils	Greenhouse Gas Emissions	Hazards / Hazardous Materials	Hydrology / Water Quality	Land Use and Planning	Mineral Resources	Noise	Population / Housing	Public Services	Recreation	Transportation / Traffic	Utilities / Service Systems	Construction Impacts	Alternatives	Other	Requests to be Notified
12	Marian Lee Caltrain Modernization Program Peninsula Corridor Joint Powers Board 1250 San Carlos Avenue San Carlos, CA 94070 (650) 508-6200 November 19, 2014	•	•	•												•	•	•	•	•	•	•	•	Includes a listing of anticipated levels of analysis for various elements which are to be reviewed in the DEIR. Other topics discussed include capacity and access for transit and other modes to support the EIR's trip generation; consistency of the traffic analysis' trip generation and parking demand assumptions with growth forecasts from Caltrain, BART, and other transit services; that transportation enhancement mitigation be contemporaneous with development; and that impacts be mitigated locally when possible.	
13	John Bergener San Francisco International Airport - Bureau of Planning and Environmental Affairs P.O Box 8097 San Francisco, California 94128 (650) 821-5000 November 20, 2014																					•	Requests that the EIR describe the proposed Project's consistency with Airport Land Use Compatibility Plan policies including those related to the effects of airport noise, portions of the Project within protected zones, and airspace protection. Additionally, it is requested that the EIR examine traffic and access impacts.		

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		Aesthetics	Agriculture and Forestry	Air Quality	Biological Resources	Cultural Resources	Geology / Soils	Greenhouse Gas Emissions	Hazards / Hazardous Materials	Hydrology / Water Quality	Land Use and Planning	Mineral Resources	Noise	Population / Housing	Public Services	Recreation	Transportation / Traffic	Utilities / Service Systems	Construction Impacts	Alternatives	Other
15	Ben Tripousis California High Speed Rail Authority – Northern California Regional Office 100 Paseo de San Antonio, San Jose, California 95113 Ben.tripousis@hsr.ca.gov November 21, 2014										•										Emphasizes the importance of appropriate land use planning and requests that the EIR include a thorough evaluation of the indirect impacts of parking and access.
16	April Chan San Mateo County Transit District (SAMTRANS) 1250 San Carlos Avenue P.O. Box 3006 San Carlos, California 94070 (650) 508-6200 November 21, 2014											•		•	•						Includes a listing of anticipated levels of analysis for various elements which are to be reviewed in the DEIR. Other topics discussed include capacity and access for transit and other modes to support the EIR's trip generation; consistency of the traffic analysis' trip generation and parking demand assumptions with growth forecasts from Caltrain, BART, and other transit services; that transportation enhancement mitigation be contemporaneous with development; and that impacts be mitigated locally when possible.

#		Comments Received on the Notice of Preparation for the Millbrae Station Area Specific Plan and Transit Oriented Developments #1 and #2 Project in the City of Millbrae																				
		Project Description	Aesthetics	Agriculture and Forestry	Air Quality	Biological Resources	Cultural Resources	Geology / Soils	Greenhouse Gas Emissions	Hazards / Hazardous Materials	Hydrology / Water Quality	Land Use and Planning	Mineral Resources	Noise	Population / Housing	Public Services	Recreation	Transportation / Traffic	Utilities / Service Systems	Construction Impacts	Alternatives	Other
18	Laura Thompson Bay Trail Project – Association of Bay Area Governments P.O. Box 2050 Oakland, California 94604 (510) 464-7900 November 24, 2014									•					•	•				•		Expresses concerns related to the continuation of the Bay Trail through Millbrae. Requests that the proposed Specific Plan allow for a variety of options to extend the trail to the north. Suggests the inclusion of several policies in the EIR. Includes considerations for the design of Millbrae TOD #1 and #2 Projects. Finally, the letter includes a listing of documents which the author suggests should be referenced in the Specific Plan.
19	Charles E. Francher, Jr. Fancher Partners, LLC, Mall Buisness, LLC 895 Dove Street, 3 <sup>rd</sup> Floor Newport Beach, California 92660 fancherco@msn.com (949) 955-7999 November 25, 2014									•									•	•	Requests that the EIR address how densities permitted in the proposed Specific Plan can be equitably allocated among the parcels. Disagrees with an assumption that surplus densities may be entitled by the City. Calls for the use of "Transferable Development Rights."	
20	Phyllis Kilgore 311 Aviador Avenue Millbrae, California 94030 December 2, 2014															•					Suggests that a bicycle path should not go through Bayside Manor.	

<i>Comments Received on the Notice of Preparation for the Millbrae Station Area Specific Plan and Transit Oriented Developments #1 and #2 Project in the City of Millbrae</i>																		
#	<b>COMMENTOR NAME AND ADDRESS</b>																	<b>SUMMARY OF COMMENT</b>
Project Description	Aesthetics	Agriculture and Forestry	Air Quality	Biological Resources	Cultural Resources	Geology / Soils	Greenhouse Gas Emissions	Hazards / Hazardous Materials	Hydrology / Water Quality	Land Use and Planning	Mineral Resources	Noise	Population / Housing	Public Services	Recreation	Transportation / Traffic	Utilities / Service Systems	Construction Impacts
21	David F. Cushing Federal Aviation Administration 1000 Marina Blvd., Suite 220 Brisbane, CA 94005 December 1, 2014	•	•					•	•	•		•	•		•	•		Other
																		Requests to be Notified



Scoping Meeting Notes  
September 30, 2014

I'm concerned about the emphasis on hotels. Current Mayor wanted nothing but a hotel. You are heavily emphasizing the hotels even though in the 2<sup>nd</sup> outreach meeting my group specifically said "no hotel." Hotel came back up. We have plenty of hotels now at 60% capacity and I am concerned that if we build more, we hurt our current hotels. Does the market analysis take into account the 400 room hotel the airport plans to build?.

You mentioned that there won't be any parking analysis in specific plan?

With all the new hotels and development, the intersections on Millbrae ave. will be effected. How are you going to study that?

You were talking about bike and ped. friendly design. Have they identified routes for bike and ped. around El Camino?

After the combined planning commission and city council meeting, it (the plan) showed no changes on El Camino Real. It was going to stay just and wide and just the same. How is it going to become more bike and ped. friendly?

What kind of retail will be built? What kind of office space?

When the BART lots are built upon will they be creating parking some place else?

Does current CEQA analysis include climate change adaptation? Does it include green building practices? Does it include bird friendly building design? Impact to birds?

Spring 2013 winter? Does that refer to this coming winter in a month or two or fall of 2015? Maybe use Q1 or Q2 instead?

Are you going to address bike and ped. crossing over El Camino?

The utility issues and climate action plans. Will you study how these buildings will decrease power use?

What about a west side garage? We must understand the impacts to intersections from people driving to current BART parking garage.

Will you study crime problems that come from folks who use BART?

Will you analyze the possibility for underground parking, green roofs, and the ability for green areas to grow food locally?

Is the project going to seal off Hemlock? Bike and pedestrians might walk through there?

Our cars on Plum ave. are hit all the time and police and fire don't care. There are people parking 3 and 4 days there. I can see this is not part of the EIR or your fiscal report.

This development will create more waste water. Are you taking that into account?

Can we submit comments after tonight? Where can we drop them off?

Can all residents get notices?

CITY OF MILLBRAE  
MILLBRAE STATION AREA SPECIFIC PLAN UPDATE EIR SCOPING MEETING

ENVIRONMENTAL SCOPING COMMENT CARD

Please fill out this card with any comments you have related to EIR scoping

Name: Ann Schneider Phone #: 650 697-6249  
Address: 406 Palm Ave. Email: SchneiderAnn@juno.com

Issues - Concern in Fiscal Analysis - that questions asked/or criteria considered by City staff in doing this study are weighted by the wants + interests of specific current & former council members. Several of whom have said hotel & only hotel on Site 5 & 6. We were told this draft fiscal analysis WILL Be available including base criteria.

Specific Station Area Transportation

I am concerned that given our council's push for hotel all the financial will just coincidentally say we HAVE to HAVE hotel

Concern that 3-4 meeting so far - still nothing showing any changes to El Camino Rd. So since this is all waiting on the "Station Access Plan" how can the 2 developers move or work on their developments.

Terry McCracken -

Climate Adaptation

Deconstruction of Bldg scheduled for demolition

Safe & pleasant pedestrian & ~~bicyc~~ bicycle areas.

CITY OF MILLBRAE  
MILLBRAE STATION AREA SPECIFIC PLAN UPDATE EIR SCOPING MEETING

ENVIRONMENTAL SCOPING COMMENT CARD

Please fill out this card with any comments you have related to EIR scoping

Name: janet creech Phone #: 650 624 9929

Address: 939 Helen Drive Email: jntcreech@gmail.com  
Millbrge

please be sure that I receive all public  
mailings + emails.

It is important that the buildings are produce  
their own electricity— all roofs with PV panels.  
And that buildings are energy efficient

Millbrge

We are mandated by the State to  
reduce Green house gas by 15% from  
2005 levels by 2015

thats daunting!

CITY OF MILLBRAE  
MILLBRAE STATION AREA SPECIFIC PLAN UPDATE EIR SCOPING MEETING

ENVIRONMENTAL SCOPING COMMENT CARD

Please fill out this card with any comments you have related to EIR scoping

Name: Dan Rogers Phone #: 650-697-1655

Address: 1101 Chablon Email: drogers939@aol.com

1.) Request: Peters Cafe and Adjacent (city destined property) be entitled for an equal proportion of development rights including uses as millbrae Scrra Project  
① is entitled to develop on their site

2) Any Westside Garage placed on site 1 is subsidized by Dev #2 on the BART site as it is a replacement parking for parking on the BART site. Any compensation to include land cost + development costs for said parking, plus it is to be a benefit for Site 1 density as parking is added to site 1.

3.) Evaluate a "Westside Garage" from the perspective of reducing traffic at the Millbrae Street & CR intersection by the transit user to be able

Don't forget to turn in your comment card before leaving the meeting!

to access a Westside Garage on site 1 from the southbound CR travellers entering site 1 via Victoria Street and 11th Street from Millbrae

**From:** Vince Muzzi [mailto:[vince@vmuzzi.com](mailto:vince@vmuzzi.com)]  
**Sent:** Wednesday, October 01, 2014 5:38 PM  
**To:** <[mvanduyn@ci.millbrae.ca.us](mailto:mvanduyn@ci.millbrae.ca.us)>  
**Subject:** Scoping for EIR

Marty,

In response to the observations reported by persons attending yesterday's Millbrae Station Area EIR scoping session, I would like to point out that there are a significant number of vehicles that appear to be parked by BART and CalTrain commuters at various neighborhood locations in proximity to the BART station which are likely to escape any traffic and parking studies being done for the Millbrae Station Area Plan. All along Millbrae Avenue from Lewis to Laurel Avenue commuter cars are parked without any limitation posted. The same is true in neighborhood streets westerly of Lewis Avenue. Posting these areas with 4 or 6 hours parking (with residents of these neighborhoods having permits to allow them such parking on their immediate streets) would limit long term parking use by commuters who should be using the BART parking and would give a much more accurate number of traffic and parking impacts of west side demands at the BART station. The same is also true on Insomuch Drive on both the Millbrae and Burlingame side of the street. Even if these areas are not posted now, the community be demanding such posting, if not part of the studies to come with the proposed plan revision, our project, or on completion of any such projects. To not include the reallocation of these "off-site" commuter cars impacts in any study of the EIR would be a significant deficiency.

As requested yesterday and just to make it official:

Please include:

(1) In the traffic studies for the update of the Millbrae Station Specific Plan and the two TOD projects relevant data regarding the number of AM and daily trips from El Camino and Millbrae Avenue over the Millbrae overpass to Rollins Road for persons who presently park at the BART Station site using Rollins Road and PM and daily trips from the BART Station out of Rollins Road to the Millbrae Avenue overpass to El Camino and Millbrae Avenue.. Please include the estimated parking demand for such vehicles in the existing BART parking area and any benefit to having those cars stay on El Camino and make use of parking at new additional parking at Site One.

(2) the study of a publicly funded (BART, CalTrain, SamTrans, Bullet Train, City, Assessment District, or P3 funded) west side garage below grade along the El Camino Frontage in combination with the proposed Site One TOD to relocate and absorb the traffic impacts and parking from the BART/Republic project and other transit and project impacts.

(3) In any EIR study of project heights any impacts other than FAA issues so that the plan will accommodate any heights that the FAA and Airport Land Use Commission and City may deign to approve for the Station Area during the plans 20 year life. We will be applying for FAA and ALUC height increases on our project, but it would be good to know that there are no other EIR issues that have not been evaluated should the FAA heights be adjusted during the plan's life and which could be simply covered by a negative declaration.

(4) An evaluation that allows for the City's plans to be able to establish and use "form based planning" (or plug and play) of multiple mixed uses that covers a flexible gamut of numbers of multiple uses within the Station Area Plan and specifically within Site One.

(5) Allow for the plan to permit development agreements for projects over up to at least a 10 year term since there may be projects in the Station Area which will require the security of a greater time line for assemblage or to avoid the unpredictable and unanticipated effects of market demand, the local and national economy to finance development of any approved projects.

Thanks,

Millbrae Serra Station, LLC by

Vincent A. Muzzi, Managing Member

--

[Vincent A. Muzzi, Esq.](#)  
[1818 Gilbreth Road, Suite 123](#)  
[Burlingame, CA 94010](#)  
[\(650\) 692-5406 Office](#)  
[\(650\) 697-4177 Fax](#)  
[vince@vmuzzi.com](mailto:vince@vmuzzi.com)

**From:** Marc Pfenninger [mailto:[mpfenninger@studios.com](mailto:mpfenninger@studios.com)]  
**Sent:** Wednesday, October 08, 2014 12:01 PM  
**To:** [mvanduyn@ci.millbrae.ca.us](mailto:mvanduyn@ci.millbrae.ca.us)  
**Cc:** Vince Muzzi; Sal Ariganello  
**Subject:** Scoping For EIR For SITE 1, Millbrae Serra Station

Marty,

Thank you for your time to discuss the height issues as it relates to the EIR scoping you are performing, and specifically for the Site 1 development that Mr. Muzzi represents (Millbrae Serra Station LLC). Here is the information you requested in regards to height limits we will be proposing;

1. To be clear propose that the remainder of the general plan area (areas outside our site) study a height limit increase to the maximum allowed by the FAA.
2. For the Millbrae Serra Station Area (Site 1), we propose a height limit be studies in the EIR process that exceeds the FAA limit. We are in the process of formulating an application to the FAA for development to exceed the current limits by up to 30 feet. And therefore propose the EIR study this limit, contingent on FAA approval. Below you will find the information you requested;
  - a. The current FAA height limit for site 1 is roughly 122' to 144' Above Mean Sea Level (AMSL). These numbers are rounded up, and they vary within this range across the site.
  - b. Our application to the FAA will propose exceeding this by up to 30'
  - c. Therefore the height limit we will be asking the FAA to approve will be a range between 152' and 174' AMSL.
  - d. Please keep in mind that this range is across the entire site-1 area.
3. We would like the EIR process to evaluate these height limits for the Millbrae Station Area (Site-1).

Based on our discussion we understand you will forward this information to your EIR consultants to be included in the evaluation process.

Please let me or Vince Muzzi know if you have any questions.

Cordially,

Marc Pfenninger AIA, LEEP AP  
*Principal*  
**STUDIOS** architecture

*Please note our new suite number:*  
405 Howard Street, Suite 488 ~ San Francisco, CA 94105  
415 732 5317 **direct** | 415.398.7575 **main** | **STUDIOS.com**



# CITY OF BURLINGAME

City Hall – 501 Primrose Road  
Burlingame, California 94010-3997



## COMMUNITY DEVELOPMENT DEPARTMENT

Planning Division  
PH: (650) 558-7250  
FAX: (650) 696-3790

October 7, 2014

Marty Van Duyn, Project Manager  
Community Development Department  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030

RE: Notice of Preparation of Draft Environmental Impact Report (DEIR) for the Millbrae Station Area Specific Plan Update and Millbrae Transit-Oriented Development (TOD) Projects

Dear Mr. Van Duyn,

Thank you for the opportunity to comment on the scope of the Draft Environmental Impact Report (DEIR) to be prepared for the Millbrae Station Area Specific Plan Update and Millbrae Transit-Oriented Development (TOD) Projects.

As noted in the Notice of Preparation, buildout of the Specific Plan would result in development of approximately 1,653,000 square feet of office, 275,000 square feet of retail space, 1,750 residential units, and 360 hotel rooms. Two specific development projects are being reviewed within the plan area: the Millbrae TOD #1 project with approximately 270,000 square feet of office, 32,000 square feet of retail space and 500 residential units, and the Millbrae TOD #2 project with approximately 165,000 square feet of office, up to 47,000 square feet of retail space, 320 residential units, and 120 hotel rooms.

The Millbrae Station Area Specific Plan boundary is adjacent to the City of Burlingame along its southern border. Traffic from the two TOD projects and future planned development within the specific plan boundaries have the potential to impact traffic on Burlingame streets and intersections, particularly along El Camino Real and Rollins Road. Please ensure that the traffic analysis takes into account the impacts to Burlingame streets and intersections on a project level, under full build-out of the Millbrae Station plan area, and with future development planned within the North Burlingame/Rollins Road Specific Plan Area. The air quality impacts associated with any increases in traffic in Burlingame should also be evaluated.

Currently, there are two development projects under construction in the North Burlingame Area:

1. **1800 Trousdale Drive**, a five-story, 25-unit residential condominium.
2. **1818 Trousdale Drive**, a four-story, 79-unit assisted living facility.

In addition, there are two development applications located in the North Burlingame Area that have been submitted to the Community Development Department for review. The environmental analysis of these projects is now underway.

1. **1600 Trousdale Drive**, a new six-story 124-unit assisted living facility (to replace a one-story office building)
2. **1008-1028 Carolan Avenue & 1007-1025 Carolan Avenue**, new, 290-unit apartment and townhome development (to replace existing automobile-related commercial uses).

These projects should be considered as a part of the analysis of potential cumulative impacts which may occur as a result of the projects.

We look forward to reviewing the Draft EIR for these projects when it becomes available. If you have any questions, please contact me at [kgardiner@burlingame.org](mailto:kgardiner@burlingame.org).

Sincerely,



Kevin Gardiner  
Planning Manager

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EXECUTIVE DIRECTOR

October 17, 2014

RECEIVED

OCT 23 2014

City of Millbrae

Community Development Department

Marty Van Duyn  
Community Development Project Manager  
Community Development Department  
City of Millbrae  
621 Magnolia Avenue,  
Millbrae, CA 94030

Re: NOP of Draft Environmental Impact Report for the Millbrae Station Area Specific Plan Update and Millbrae Transit-Oriented Development (TOD) Projects.

Dear Mr. Van Duyn,

The San Mateo County Transit District has received the Notice of Preparation (NOP) of the Draft Environmental Impact Report (EIR) for the Millbrae Station Area Specific Plan Update and Millbrae Transit-Oriented Development (TOD) Projects.

The District is the administrative body for the principal transit systems in San Mateo County, namely SamTrans (bus service) and Caltrain (commuter rail). Both, SamTrans and Caltrain, provide important transit services at the Millbrae Bart/Caltrain Station.

As indicated in the NOP, the City of Millbrae is initiating a Program Level EIR to meet the requirements of the California Environmental Quality Act (CEQA) guidelines for the Millbrae Station Area Specific Plan. The District is aware of the different components of the proposed plan and has some concerns on the impacts that such plan could pose on transit access and connectivity. The District, therefore, requests to be included in all the steps conducive to the completion of the subject EIR so that the following areas would be adequately addressed in the environmental document:

- Development Footprint
- Traffic and circulation impacts and mitigation
- Impacts to regional transit movement and other modes of transportation
- Travel and parking demands consistent with ridership growth forecasts from Caltrain, SamTrans and BART
- Bus and Shuttles
- Taxi/Rideshares and Kiss & Ride
- Pedestrian and Bicycle Connectivity
- Station Access

Lastly, we would like to note that the NOP project map designates two specific development sites within the larger station area. As drawn, the borders of "TOD Site #1," on the west side of the station, appear to encroach onto station facilities and into areas of right of way owned by the JPB and the San Mateo County Transit District. We would like to see this map corrected.

We appreciate the willingness of city staff to discuss by phone today the process and the opportunities that will be available to seek revisions and modifications that will address our concerns. We are encouraged by the commitments expressed today and the clear

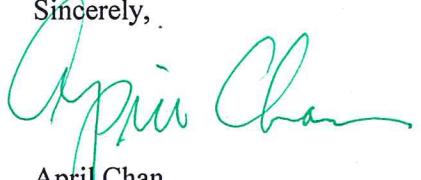
Marty Van Duyn

October 17, 2014

Page 2 of 2

desire of city staff to proceed in a cooperative and collaborative way. We are eager to partner with the city to achieve this important plan and to pursue our common interests for a successful project that assures it is fully functional as a transit center.

Sincerely,



April Chan

Executive Officer of Planning and Development



*Loma Prieta Chapter serving San Mateo, Santa Clara & San Benito Counties*

October 17, 2014

Chair and Members of the Millbrae City Council &  
Mr. Marty Van Duyn – Community Development Project Manager  
C/O City Clerk  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA. 94030

**Re: Millbrae Station Area Specific Plan (MSASP) & Draft EIR**

Dear Chair and Members of the City Council & Mr. Van Duyn:

Thank you for providing the opportunity for the Sierra Club Loma Prieta Chapter Sustainable Land Use Committee to comment on the proposed MSASP. As an environmental organization working towards reducing local greenhouse gas emissions, we encourage the development of higher density, mixed-use development near major transit stations.

Although the MSASP is still in the conceptual development stage, we believe the general direction of the MSASP looks to have many features that make it an appealing Plan.

1. Mixed use development
2. Pedestrian priority areas
3. Designated bicycle routes

Once the draft MSASP is released to the public, the Sierra Club's Sustainable Land Use Committee will evaluate it using our *Guidelines for Downtown and Station Area Plans* <http://lomaprieta.sierraclub.org/sustain/guidelines> to decide whether it will qualify for Sierra Club endorsement. Meanwhile we have some concerns that we ask you to consider in both the specific plan and the upcoming DEIR.

**1. Approval of Urban Republic and Serra Properties proposals** - We understand the approval process for these two developments will be done in parallel with approval of the MSASP. We are concerned that the specifics of each of these proposals may unduly influence the final elements of the MSASP and urge you to consider the MSASP separate from these two proposals. For example, there are elements of the 1998 Plan that these two proposals do not include which we feel should be considered such as a pedestrian bridge crossing over El Camino Real and a pedestrian / bike undercrossing beneath E. Millbrae Avenue.

**2. El Camino Real & East Millbrae Avenue**

The vital pedestrian access routes needed to make this plan work are very problematic.

- a. El Camino Real is currently three lanes each way - a very busy street which is a major impediment to pedestrians trying to cross from the multi-modal center to properties west of El Camino. The evolving MSASP shows enhanced at-grade street crossings at Victoria Avenue, Millbrae Avenue, and Murchinson Drive, but no direct crossing from the multi-modal station to the west side of El Camino Real. This requires pedestrians and bicyclists to take a circuitous route to cross El Camino. The 1998 Specific Plan included a potential pedestrian bridge overcrossing of El Camino in alignment with a new pedestrian plaza between the Caltrain station and El Camino. Such a bridge would solve the pedestrian crossing problem and should be seriously considered in

the MSASP. An alternative, is to reduce El Camino to two traffic lanes each way rather than three and to add a center island, bulb outs, landscaping, and other amenities to slow traffic and improve pedestrian safety at enhanced on-grade street crossings in support of the vision put forth in the Grand Boulevard Initiative.

- b. East Millbrae Avenue is a major physical and visual impediment to integrating the Plan areas north and south of E. Millbrae Avenue. The current Plan relies on Rollins Road to connect the two sides, but that will require a safe and inviting auto / pedestrian / bike crossing at the intersection of Rollins Road and E. Millbrae Avenue which, given Rollins Road's close proximity to the 101 off ramp, will be difficult to do. The 1998 Specific Plan addressed this problem by including a direct 'subway' pedestrian / bicycle crossing under E. Millbrae Avenue to facilitate pedestrian and bike access to properties south of E. Millbrae Avenue. The current Republic Urban proposal does not include such a link. A direct, attractive and safe pedestrian-priority connection between properties north and south of E. Millbrae Avenue should be included in the MSASP.
- c. Improving the safety and convenience of street crossing on these two thoroughfares, could go a long way toward helping the city improve the Walk Score for the project area. <http://www.walkscore.com/>.

### **3. Promote walking, biking, and transit-use as projects are developed within the MSASP**

- a. Assure pedestrian safety: Pedestrian convenience should be the primary design criteria. Sidewalks and street crossings should be designed to assure public safety.
- b. Walks: Provide walkways that are wide and protected from traffic by landscaped strips or parked cars. They should be attractive to encourage walking, and include street trees where practical. Street crossings should include curb bulb-outs to shorten the time pedestrians are in the cross walk.
- c. Public plazas: Provide conveniently located and attractive pedestrian-oriented public plazas as stand-alone features and/or combined open space with nearby projects.
- d. Connectivity: Provide direct connections to the city's existing public sidewalks and urban trail system and provide a major pedestrian connection to the west side of El Camino Real and the South side of E. Millbrae Avenue.
- e. Safe Routes to School: Design new pedestrian plazas and walkways to meet "Safe Routes to School" criteria.
- f. Block size: Break up large building blocks with pedestrian alleés, pass through lobby, or pathway every 50' in order to make walking the most convenient, fastest, and pleasurable mode of transportation to get around.
- g. Traffic speed: Limit traffic speed in pedestrian-priority areas to 15 mph maximum. Studies show that pedestrian vs. auto fatalities are greatly reduced at this speed.
- h. Improve bus stops: Encourage bus use by working with the city and SamTrans to provide benches or seats in rain-protected shelters at conveniently located bus stop(s) and install nighttime illumination of the bus stop(s).
- i. Issue Free Transit Passes: Provide every tenant (residential and commercial) with free transit passes for the first five years or more of tenancy to encourage transit use. This requirement is being implemented in many cities as part of Climate Action Plans in order to meet state law mandates for Air Quality goals.
- j. Implement relevant portions of the City's Bicycle Master Plan as it relates to the MSASP.
- k. Bike Parking: Provide one free gender-secure bike parking spot per unit and 10% or more bikes per car parking ratio for public and guest parking.

- l. Way-finding: Provide way-finding signage with directions to nearby bike routes.
- m. Bike share: Provide bike share on-site or within 3 blocks of the development.
- n. Shuttles and car share: Provide public or employee shuttle stops and car-share parking on-site or on adjacent streets to help commuters make the “last mile” connection to their place of work or home.
- o. Mobility Management: Support a mobility management program to increase demand for alternative transportation by providing convenient and cost saving technology such as apps for peer-to-peer car share and smart cards for easy transit access and payments.

**4. Housing Density and Affordable Housing** - The amount of affordable housing, if any, is undefined and the total number of potential housing units in the MSASP is also undefined. The MSASP should include 40 units per acre or more of housing including at least 15% affordable units to house enough residents to support the local retail stores and to increase transit ridership.

**5. Reduce Parking** - Given that structured parking spaces generally cost \$30,000 - \$40,000 or more per space to build and that this site is a transit-oriented site, the number of parking spaces per unit should be reduced to one car per unit or less and the money saved on constructing parking used to build additional housing units and to support related community benefits such as child care and green space.

Please refer to the Sierra Club’s White Paper: *Recommendations for Housing Affordability, Reduced Parking Cost and Congestion* for further strategies for reducing parking costs <http://lomaprieta.sierraclub.org/sustain/guidelines> (bottom of page).

- a. Reduce parking ratio: The MSASP is a great opportunity to do a truly Transit-Oriented Development, not an auto-oriented development. This means that parking ratios should be severely reduced from that of non-transit-oriented developments. A recent study conducted by San Jose State University (SJSU) and Santa Clara Valley Transportation Authority (VTA) found that parking usage rates at 12 transit-oriented developments near VTA light rail and Caltrain stations were significantly “over parked”<sup>1</sup>. Over parking is bad for the development as it increases cost. It is also bad for the City’s Climate Action Plan that counts on TOD to reduce greenhouse gases due to traffic. By improving the Walk Score as suggested in 2c, Millbrae could further reduce the need to drive. A more appropriate parking ratio for a TOD is one car per unit or less.
- b. Provide shared parking: The developers should offer shared parking where commuters and retail customers can use on-site parking during the day and residential tenants can use the parking at night. This would reduce the overall number of parking spaces required and reduce project cost.
- c. Fund enforcement of Millbrae's Residential Permit Parking program: Currently we understand that the program is unenforced in surrounding neighborhoods. Enforcement would make parking changes in the station area feasible and acceptable.
- d. Provide unbundled parking: Unbundled parking in residential dwellings (i.e. the cost to park a car is separate from unit rent) can make units more affordable for those who do not drive and prefer not to own a car. This provides a real incentive for residents to consider alternative modes of transportation by reflecting the true cost of parking. People often self select to live near transit because they prefer to use alternative modes of transportation and the MSASP should include features that attract these non-drivers (often young professionals, empty nesters, and senior citizens).
- e. Parking permits: Opposition to unbundled and reduced parking may come from nearby residential and commercial neighbors where free parking is provided. They may be concerned that residents in the MSASP will choose to park on neighboring streets rather than pay to park in their own development. One strategy to

overcome this resistance is to establish residential permit parking in residential areas adjacent to new development which limits the time that unpermitted parking is allowed. Installing parking meters in commercial districts is also effective.

- f. Pay parking in-lieu fee: Contribute a in-lieu fee to build nearby public satellite parking to serve the development. If public satellite parking is located off-site, but close by, it can reduce the number of cars that need to be parked on-site and allow some on-site areas that would have been dedicated to parking to be used to increase retail or housing units, thus increasing overall project rental and tax income.
- g. Congestion pricing: Owners of the development or the city to establish a congestion pricing program in and adjacent to the MSASP to help even out parking demand at different times of the day.

<sup>1</sup> The 2010 collaborative research with San José State University (SJSU) and VTA titled “*A Parking Utilization Survey of Transit-Oriented Development Residential Properties in Santa Clara County*” found that parking usage rates at 12 transit-oriented developments (TOD) near VTA light rail and Caltrain stations were significantly over parked. The peak parking utilization surveys were conducted mid-week between 12:00 midnight and 4:00 a.m., and all 12 TOD residential sites offered more parking supply than parking demand (actual use). Nearly 26 percent of parking spaces for the 12 survey sites were not utilized (2,496 unused). SJSU and VTA estimated the 2,496 unused parking spaces for the 12 TOD sites would represent approximately \$37.4 million in opportunity cost.

## **6. Provide Community Benefits**

- a. Community Benefit Agreement: Enter into a community benefit agreement with the city that outlines the development's contributions to the community. Community benefits may include living wages, local hiring and training programs, affordable housing, day care facilities, a community meeting room, public parks and plazas, and environmental remediation, as well as funds for community programs such as shuttles, beautification, and neighborhood improvements.
- b. Development fees: Contribute a donation or pay development fees for community benefits such as maintenance and upgrade of on-site and off-site public parks and trails, restoration of existing natural features, and on-site agriculture or community gardens.

**7. Bus convenience** - The Plan does not currently include a designated bus stop on El Camino Real for access to the multi-modal station. The current circuitous route used by SamTrans to service the station is very inefficient and time consuming. A clearly defined bus stop on El Camino Real (opposite the proposed pedestrian plaza leading to the multi-modal station as visualized in the 1998 Plan) should be included in the MSASP.

**8. Lucky / Walgreens Site** - We are curious why the Lucky / Walgreens site on Murchinson Drive was not included in the MSASP. It is only slightly beyond the 800' walk circle, but easily within ¼ mile of the multi-modal station. Surely, this site should be included in a 20 year plan which could see either Lucky or Walgreens move out of the area.

**9. Sea Level Rise** What impact will future seal level rise have on development in the MSASP? If significant impact is probable, what strategies to prevent flooding and storm damage are built into the Plan?

## **10. Environment, Energy, and Resource Efficiency:**

- a. Air quality: Assure development meets regional air quality goals including the requirements of BAAQMD's latest Clean Air Plan and Regional Transportation Plan for the Bay Area.
- b. Building and site construction:
  - 1) Meet minimum LEED Silver or 75 points Green Point Rating.
  - 2) Include Net Zero Energy design for renewable energy and to meet Climate Action Plan goals (e.g. solar panels, and energy efficient fixtures).
  - 3) Incorporate bird-friendly design to reduce bird deaths from collisions with buildings.
  - 4) Include sustainable landscaping and/or roof top gardens.
  - 5) Include Class 2 electric car charging stations for at least 10% of parking spaces.

- 6) Deconstruct 70% minimum existing parking lots and structures so materials can be reused or recycled to reduce landfill.
- 7) Use FSC certified wood for at least 75% of wood used to build the development.
- 8) Provide a grey water reuse program.
- 9) Install on-site sewage treatment facility.
- 10) Incorporate Low Impact Development such as pervious paving and vegetated swales to benefit water supply and contribute to water quality protection.

#### **11. Summary of our Concerns:**

- a. Develop the MSASP with an independent eye so that the Urban Republic Proposal and the Serra Properties proposal do not unduly influence the Plan.
- b. Plan for safe pedestrian crossings at both El Camino Real and E. Millbrae Avenue.
- c. Pedestrian priority, convenience, and safety should be the primary design criteria for developments within the MSASP.
- d. Include at least 40 units or more per acre density and 15% affordable housing in the Plan. Affordable units are especially important along the Grand Boulevard corridor, and are a consideration for MTC funding for road and transit improvements in the PDA corridor.
- e. Reduce parking.
- f. Provide community benefits.
- g. Provide a safe and inviting bus stop on El Camino Real for direct access to the proposed plaza leading to the multi-modal station, and include additional bus stop(s) elsewhere in the MSASP as needed.
- h. Include the Lucky / Walgreens site in the MSASP.
- i. Establish design criteria to support environmental energy and resource efficiency.

Thank you for considering our comments for this station area plan. We look forward to reviewing the draft MSASP when it is issued.

Respectively Submitted,

Gladwyn d'Souza



Sustainable Land Use Committee  
Sierra Club Loma Prieta Chapter

**From:** aldeivnian@gmail.com [mailto:aldeivnian@gmail.com] **On Behalf Of** Adina Levin  
**Sent:** Sunday, October 19, 2014 10:06 PM  
**To:** mvanduyn@ci.millbrae.ca.us; alouis@ci.millbrae.ca.us  
**Subject:** Millbrae Station Area Specific Plan & Draft EIR

Dear Chair and Members of the City Council & Mr. Van Duyn:

Thank you for providing the opportunity for Friends of Caltrain / Peninsula Transportation Alternatives to comment on the proposed Millbrae Station Area Specific Plan. We are a group with over 3500 participants on the Caltrain corridor in favor of effective transit and transit-supportive policies.

We are strongly supportive of a plan that will evolve the station area into a destination that provides economic development, jobs, and homes, taking full advantage of the robust transit resources in the station area.

There is an important transition under way in the way that transportation impacts are assessed under the California Environmental Quality Act. According to new rules required by SB743 passed last year, the primary transportation impact metric is changing from automotive delay at intersections, most likely to vehicle miles travelled per capita. ([http://www.opr.ca.gov/s\\_sb743.php](http://www.opr.ca.gov/s_sb743.php)) If a location generates VMT per capita that is lower than the regional average, that is a favorable result. The new rules will take effect immediately for locations like the Millbrae Station Area with high-quality transit. Therefore for the longevity of the plan and consistency with the new policy, the EIR should calculate VMT impacts.

We support strong elements of the plan to reduce VMT impacts.

Currently, the station area is a challenge to reach or to leave on foot or by bicycle. While the city has made improvements to the El Camino crossing, the connections are not sufficiently easy to use and safe. Options for lane reductions to reduce crossing distances should be studied for the potential to reduce vehicle trips to and from local Millbrae destinations.

The plan should vehicle trip and mode share goals for the station area, including requirements for developers and funding for shared programs via a Transportation Management Association. Programs should include discount transit passes for 40 years (per the requirements of the TransForm GreenTrip program <http://www.transformca.org/sites/default/files/discount-transit-passes.pdf>), as well as carshare and unbundled parking). Such a strong plan can create justification for deeper vehicle trip reduction and lower VMT impacts. Market trends in the most recent economic cycle make these transportation benefits into a business benefit for developers and for tenants.

Support for affordable housing near transit is a powerful strategy to reduce vehicle miles travelled according to a recent report from TransForm. In addition, this strategy can help

mitigate displacement of residents, as new jobs in the station area will include both high and low wage jobs.

<http://www.transformca.org/transform-report/why-creating-and-preserving-affordable-homes-near-transit-highly-effective-climate>

Thank you very much for your consideration.

Sincerely,

- Adina

Adina Levin

Friends of Caltrain - <http://greencaltrain.com>

Peninsula Transportation Alternatives - <http://peninsulatransportation.org>

650-646-4344



November 3, 2014

RECEIVED

NOV 10 2014

Marty Van Duy  
City of Millbrae Community Development Department  
621 Magnolia Avenue  
Millbrae, CA 94030

City of Millbrae

Community Development Department

RE: SCH# 2014092061 Millbrae Station Area Specific Plan Update, San Mateo County.

Dear Mr. Van Duy,

The Native American Heritage Commission (NAHC) has reviewed the Notice of Preparation (NOP) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:
  - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
  - A Sacred Lands File Check. **USGS 7.5-minute quadrangle name, township, range, and section required**
  - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached**
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) Guidelines §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Lead agencies should include in their mitigation plan provisions for the disposition of recovered cultural items that are not burial associated, which are addressed in Public Resources Code (PRC) §5097.98, in consultation with culturally affiliated Native Americans.
  - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, PRC §5097.98, and CEQA Guidelines §15064.5(e), address the process to be followed in the event of an accidental discovery of any human remains and associated grave goods in a location other than a dedicated cemetery.

Sincerely,

*Katy Sanchez*  
Katy Sanchez  
Associate Government Program Analyst

CC: State Clearinghouse

**Native American Contacts  
San Mateo County  
November 3, 2014**

Jakki Kehl  
720 North 2nd Street  
Patterson , CA 95363  
jakkikehl@gmail.com  
510-701-3975

Ohlone/Costanoan

Muwekma Ohlone Indian Tribe of the SF Bay Area  
Rosemary Cambra, Chairperson  
P.O. Box 360791 Ohlone / Costanoan  
Milpitas , CA 95036  
muwekma@muwekma.org  
(408) 205-9714  
(510) 581-5194

Coastanoan Rumsen Carmel Tribe  
Tony Cerdá, Chairperson  
240 E. 1st Street Ohlone/Costanoan  
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(909) 629-6081

Ohlone/Costanoan

The Ohlone Indian Tribe  
Andrew Galvan  
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Fremont , CA 94539 Bay Miwok  
chochenyo@AOL.com Plains Miwok  
(510) 882-0527 Cell Patwin  
(510) 687-9393 Fax

Trina Marine Ruano Family  
Ramona Garibay, Representative  
30940 Watkins Street Ohlone/Costanoan  
Union City , CA 94587 Bay Miwok  
soaprootmo@comcast.net Plains Miwok  
(510) 972-0645 Patwin

Indian Canyon Mutsun Band of Costanoan  
Ann Marie Sayers, Chairperson  
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ams@indiancanyon.org  
(831) 637-4238

Amah Mutsun Tribal Band of Mission San Juan Bautista  
Irene Zwierlein, Chairperson  
789 Canada Road Ohlone/Costanoan  
Woodside , CA 94062  
amahmutsuntribal@gmail.com  
(650) 400-4806 Cell  
(650) 332-1526 Fax

Linda G. Yamane  
1585 Mira Mar Ave Ohlone/Costanoan  
Seaside , CA 93955  
rumsien123@yahoo.com  
(831) 394-5915

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting Native Americans with regard to cultural resources for the proposed  
SCH # 2014092061 Millbrae Station Area Specific Plan Update. San Mateo County.

## Native American Contacts San Mateo County November 3, 2014

Amah Mutsun Tribal Band of Mission San Juan Bautista  
Mission, CA

Michelle Zimmer

Woodside , CA 94062

amahmutsuntribal@gmail.com

(650) 851-7747 Home

(650) 332-1526 Fax

This list is current only as of the date of this document.

**Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.**

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed SCH # 2014092061 Millbrae Station Area Specific Plan Update, San Mateo County.

---

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN JR., Governor

**DEPARTMENT OF TRANSPORTATION****DISTRICT 4**

111 GRAND AVENUE  
P.O. BOX 23650, MS-10D  
OAKLAND, CA 94623-0660  
PHONE (510) 286-6053  
FAX (510) 286-5559  
TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)

*Flex your power!  
Be energy efficient!*

November 4, 2014

SMVar025  
SCH# 2014092061

Mr. Marty Van Duyn  
City of Millbrae  
Community Development Department  
621 Magnolia Avenue  
Millbrae, CA 94030

Dear Mr. Van Duyn:

**Millbrae Station Area Specific Plan Update – Notice of Preparation**

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above project. The following comments are based on the Notice of Preparation. As lead agency, the City of Millbrae (City) is responsible for all project mitigation, including any needed improvements to state highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. The project's specific traffic mitigation fee should be identified. Any required roadway improvements should be completed prior to issuance of the project's Certificate of Occupancy. An encroachment permit is required for work in the state right of way (ROW), and Caltrans will not issue a permit until our concerns are adequately addressed. Therefore, we strongly recommend that the City work with both the applicant and Caltrans to ensure that project issues are resolved during the environmental process, and in any case prior to submittal of a permit application. Further comments will be provided during the encroachment permit process; see the end of this letter for more information regarding encroachment permits.

***Traffic Impact Study***

One of Caltrans' ongoing responsibilities is to collaborate with local agencies to avoid, eliminate, or reduce to insignificant levels potential adverse impacts to the state highway system from local development projects. We recommend using the Caltrans *Guide for the Preparation of Traffic Impact Studies* (TIS Guide) for determining which scenarios and methodologies to use in the analysis. We encourage the City to coordinate preparation of the Traffic Impact Study (TIS) with our office, and we would appreciate the opportunity to review the scope of work. Please include the information detailed below in the TIS to ensure that project-related impacts to state roadway facilities are thoroughly assessed. The TIS Guide is available at the following website: [http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf).

Mr. Marty Van Duyn/City of Millbrae

November 4, 2014

Page 2

The TIS should include:

1. Vicinity map, regional location map, and a site plan clearly showing project access in relation to nearby state roadways. Ingress and egress for all project components should be clearly identified. The state ROW should be clearly identified.
2. The maps should also include project driveways, local roads and intersections, parking, and transit facilities.
3. Project-related trip generation, distribution, and assignment. The assumptions and methodologies used to develop this information should be detailed in the study, and should be supported with appropriate documentation.
4. Average Daily Traffic, AM and PM peak hour volumes and levels of service (LOS) on all significantly affected roadways, including crossroads and controlled intersections for existing, existing plus project, cumulative and cumulative plus project scenarios. Calculation of cumulative traffic volumes should consider all traffic-generating developments, both existing and future, that would affect study area roadways and intersections. The analysis should clearly identify the project's contribution to area traffic and degradation to existing and cumulative LOS. Lastly, the Caltrans LOS threshold, which is the transition between LOS C and D, and is explained in detail in the *Guide for the Preparation of Traffic Impact Studies*, should be applied to all state facilities. Please note, Caltrans considers LOS by itself as an inadequate measure of effectiveness (MOE) for describing traffic operational conditions since it may actually mask a deficient condition on one or more approaches. As for intersection analysis the accepted MOEs used by Caltrans include flow (output), average control delay, queue (length or number of vehicles), and Volume/Capacity (V/C) ratio. For freeway and ramp operations, flow (output), speed, and travel time/delay are the accepted MOEs in addition to LOS.
5. Schematic illustration of traffic conditions including the project site and study area roadways, trip distribution percentages and volumes as well as intersection geometrics, i.e., lane configurations, for the scenarios described above.

If the proposed project will not generate the amount of trips needed to meet Caltrans trip generation thresholds, an explanation of how this conclusion was reached must be provided.

#### ***Vehicle Trip Reduction***

Caltrans both commends and encourages the City to locate needed housing, jobs and neighborhood services near major mass transit centers, with connecting streets configured to facilitate walking and biking, as a means of promoting mass transit use and reducing regional vehicle miles traveled and traffic impacts on the state highways.

We also encourage you to further develop Travel Demand Management policies to encourage usage of nearby public transit lines and reduce vehicle trips on the state highway system. These

Mr. Marty Van Duyn/City of Millbrae

November 4, 2014

Page 3

policies could include lower parking ratios, car-sharing programs, bicycle parking and showers for employees, and providing transit passes to residents and employees, among others. For information about parking ratios, see the Metropolitan Transportation Commission (MTC) report *Reforming Parking Policies to Support Smart Growth* or visit the MTC parking webpage: [http://www.mtc.ca.gov/planning/smart\\_growth/parking/](http://www.mtc.ca.gov/planning/smart_growth/parking/).

In addition, secondary impacts on pedestrians and bicyclists resulting from any traffic impact mitigation measures should be analyzed. The analysis should describe any pedestrian and bicycle mitigation measures and safety countermeasures that would in turn be needed as a means of maintaining and improving access to transit facilities and reducing vehicle trips and traffic impacts on state highways.

#### ***Cultural Resources***

Caltrans requires that a project environmental document include documentation of a current archaeological record search from the Northwest Information Center of the California Historical Resources Information System if construction activities are proposed within the state ROW. Current record searches must be no more than five years old. Caltrans requires the records search, and if warranted, a cultural resource study by a qualified, professional archaeologist, and evidence of Native American consultation to ensure compliance with California Environmental Quality Act, Section 5024.5 and 5097 of the California Public Resources Code, and Volume 2 of Caltrans' Standard Environmental Reference (<http://ser.dot.ca.gov>). These requirements, including applicable mitigation, must be fulfilled before an encroachment permit can be issued for project-related work in state ROW; these requirements also apply to National Environmental Policy Act documents when there is a federal action on a project. Work subject to these requirements includes, but is not limited to: lane widening, channelization, auxiliary lanes, and/or modification of existing features such as slopes, drainage features, curbs, sidewalks and driveways within or adjacent to the state ROW.

#### ***Encroachment Permit***

Work that encroaches onto the state ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating the state ROW must be submitted to: Office of Permits, California Department of Transportation, District 4, P.O. 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans during the encroachment permit process. See the website link below for more information.  
<http://www.dot.ca.gov/hq/traffops/developserv/permits/>

Please forward at least one hard copy and one CD of the environmental document, along with the TIS, including Technical Appendices, as soon as they are available.

Mr. Marty Van Duyn/City of Millbrae  
November 4, 2014  
Page 4

Please feel free to call or email Sandra Finegan at (510) 622-1644 or [sandra.finegan@dot.ca.gov](mailto:sandra.finegan@dot.ca.gov) with any questions regarding this letter.

Sincerely,



ERIK ALM, AICP  
District Branch Chief  
Local Development – Intergovernmental Review

c: State Clearinghouse



TOM NOLAN, CHAIR  
 JOSÉ CISNEROS  
 MALIA COHEN  
 ROSE GUILBAULT  
 ASH KALRA  
 ADRIENNE TISSIER  
 PERRY WOODWARD  
 KEN YEAGER

MICHAEL J. SCANLON  
 EXECUTIVE DIRECTOR

November 19, 2014

Mr. Marty Van Duyn  
 Community Development Project Manager  
 Community Development Department  
 621 Magnolia Avenue,  
 Millbrae, CA 94030

Re: NOP of Draft Environmental Impact Report for the Millbrae Station Area Specific Plan Update and Millbrae Transit-Oriented Development (TOD) Projects.

Dear Mr. Van Duyn,

On behalf of the Peninsula Corridor Joint Powers Board (JPB), Caltrain is submitting the following comments on the Notice of Preparation (NOP) of the Draft Environmental Impact Report (EIR) for the Millbrae Station Area Specific Plan (MSASP) Update and Millbrae Transit-Oriented Development (TOD) Projects. Caltrain staff appreciates your accommodation of our request for an extension of the NOP comment period.

The Millbrae Intermodal Transit Center is the San Francisco Peninsula's premier intermodal hub, providing critical access to regional transit systems and to the San Francisco International Airport. The Intermodal Station has also been identified as a future station for California's High Speed Rail system, a designation that will further enhance its importance. As one of the station's transit operators, Caltrain enthusiastically supports the City of Millbrae's vision for vibrant, station area development that supports the overall function of the transit center. We look forward to continued work with the City, BART, Samtrans and the development community to achieve this outcome.

Within the City's update of the Millbrae Station Area Specific Plan, we look forward to assisting the city develop a plan and accompanying program-level environmental analysis that comprehensively addresses our critical areas of concern: bus and shuttle transit access, capacity, and circulation, pedestrian and bicycle connectivity and facilities, and auto access and circulation including private auto, taxi, rideshare and kiss and ride.

We anticipate seeing this analysis conducted comprehensively for the MSASP area using travel and parking demand consistent with ridership and growth forecasts provided by transit operators and consistent with their ongoing local and system wide capital plans (including the Caltrain Modernization Program, Samtrans bus improvements, and future High Speed Rail services). We also look forward to seeing a detailed capital improvement and implementation component of the MSASP that identifies the process and mechanisms that will be used to phase, fund and construct the shared infrastructure and improvements that serve the entire MSASP area. We anticipate that any transportation enhancements needed to mitigate the impacts of the plan's build out will be contemporaneous with development and will not defer mitigation.

At this time we are concerned that the NOP does not include sufficient detail on either of the proposed Transit Oriented Development sites. Because of this we are unable to provide project-level scoping comments to inform the development of the draft environmental document. We look forward to supporting site planning efforts for both developments and anticipate providing detailed, project-level comments at a future date. We expect that any project-level impacts identified in the analysis will be mitigated locally and contemporaneously with development.

Caltrain staff is particularly appreciative of the efforts of the City, BART and Republic Urban to solicit our input on site plan concepts for TOD #2 and we will continue to support their planning and design efforts as the project moves forward.

TOD #1 is an extraordinarily sensitive site for Caltrain's station access and transit needs. We anticipate working with the City and relevant stakeholders to provide detailed input regarding the development's site plan and its accommodation of transit access facilities. We acknowledge that the site presents unique property ownership and phasing challenges and we are ready to assist the City and development stakeholders as they develop and environmentally clear an MSASP and TOD #1 site plan that respects and enhances the existing 1998 MSASP design for transit facilities on the west side of the station.

We look forward to working with you on this important effort. Sebastian Petty, Senior Planner with the Caltrain modernization Program will continue to be the agency's key contact for this project. Please contact him at 650-622-7831 or [pettys@samtrans.com](mailto:pettys@samtrans.com) if you have any questions.

Sincerely,



Marian Lee

Executive Officer, Caltrain Modernization Program

Copy: April Chan  
Mark Simon  
Chuck Harvey



San Francisco International Airport

November 20, 2014

Mr. Marty Van Duyn  
Community Development Project Manager  
621 Magnolia Avenue  
Millbrae, CA 94030

***Subject: Millbrae Station Area Specific Plan Update EIR Notice of Preparation***

Dear Mr. Van Duyn:

Thank you for notifying San Francisco International Airport (SFO or the Airport) that the City of Millbrae (Millbrae) is preparing an Environmental Impact Report (EIR) for the Millbrae Station Area Specific Plan (Specific Plan) and for two Millbrae Transit Oriented Development (TOD) projects within the Specific Plan boundaries (collectively the Proposed Project). The EIR will address the Specific Plan at a programmatic level and the TOD projects at a project level. The development of the Specific Plan area is of great interest to the Airport as the Millbrae Multimodal Station will be a primary connection point between the Airport and future development of High Speed Rail including early electrification and greater frequency of Caltrain service. We appreciate this opportunity to coordinate with Millbrae in considering and evaluating potential land use compatibility issues that this and similar projects may pose.

SFO staff has reviewed the revised EIR Notice of Preparation for the Proposed Project and the alternatives that will be evaluated in the forthcoming Draft EIR. The Project involves significant office, retail, and residential development within the Project site. Build out of the 116 acres of the Specific Plan over the next 25 years would result in approximately 1,653,000 square feet of office, 275,000 square feet of retail space, 1,750 residential units, and 360 hotel rooms. SFO submits the following comments for consideration in scoping the environmental analysis.

Millbrae, including the Proposed Project site area, is located within the Airport Influence Areas A and B, as defined in the Comprehensive Airport Land Use Compatibility Plan for the Environs of SFO (ALUCP). The ALUCP was adopted by the City/County Association of Governments of San Mateo County (C/CAG) in 2012 and addresses issues related to compatibility between airport operations and surrounding proposed land use development, considering noise impacts, safety of persons on the ground and in flight, height restrictions/airspace protection, and overflight notification. The forthcoming Draft EIR should describe the Proposed Project's consistency with ALUCP policies.

In evaluating the Proposed Project land use scenario, which proposes 1,750 new residential units, the EIR must consider the effects of noise on residential uses. Although most of the Proposed Project site is not within the Airport's 65 dB CNEL noise contour, it is subject to frequent overflights from aircraft arriving to or departing from SFO and the site is located near the Airport's primary departure runways. Additionally, the Project site is exposed to noise from Highway 101, BART, Caltrain, and the future California High Speed Rail line. The EIR should describe the Proposed Project's consistency with noise policies described in the ALUCP NP-1 through NP-4, and noise impacts on sensitive receptors and any necessary mitigation measures should be fully evaluated in the EIR.

**AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO**

EDWIN M. LEE  
MAYOR

LARRY MAZZOLA  
PRESIDENT

LINDA S. CRAYTON  
VICE PRESIDENT

ELEANOR JOHNS

RICHARD J. GUGGENHIME

PETER A. STERN

JOHN L. MARTIN  
AIRPORT DIRECTOR

Portions of the Proposed Project site area are within the Runway Protection Zone (RPZ), Inner Approach/Departure Zone (IADZ), and Inner Turning Zone (ITZ) as described in the ALUCP. The forthcoming Draft EIR should describe the Proposed Project's consistency with land use criteria within these runway end safety zones as described in the ALUCP SP-1 through SP-3.

The Proposed Project site area lies beneath critical aeronautical surfaces associated with aircraft flight operations at SFO. The forthcoming Draft EIR should describe the Proposed Project's consistency with airspace protection policies as described in the ALUCP AP-1 through AP-4.

Access to the Airport's property bounded by Aviador Avenue, Millbrae Avenue, Highline Canal and Highway 101 called the Aviador site or Site 7 in the Specific Plan has a single access route from Millbrae Avenue via Rollins Road to Garden Lane to Aviador Avenue. This site is typically used by the Airport for temporary construction staging, utility access, and other limited uses subject to approval by the Federal Aviation Administration. The forthcoming Draft EIR should examine traffic and access impacts of the Proposed Project to ensure that adequate and unimpeded access to all parcels in the Proposed Project boundaries is maintained.

The Airport appreciates your consideration of these comments. Please include SFO's Bureau of Planning and Environmental Affairs on the distribution list for the Draft EIR. If I can be of assistance as the City considers airport land use compatibility as it relates to this project or future projects, please do not hesitate to contact me at (650) 821-7867 or at [john.bergener@flysfo.com](mailto:john.bergener@flysfo.com).

Sincerely,



John Bergener  
Airport Planning Director  
Bureau of Planning and Environmental Affairs

cc: Nixon Lam, SFO, Environmental Affairs Manager  
Sandy Wong, C/CAG  
Richard Newman, ALUC



*Loma Prieta Chapter serving San Mateo, Santa Clara & San Benito Counties*

November 20, 2014

Mr. Marty Van Duyn – Community Development Project Manager [mvanduyn@ci.millbrae.ca.us]  
Community Development Department  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA. 94030

**Re: Millbrae Station Area Specific Plan (MSASP) Update DEIR**

Dear Mr. Van Duyn:

Thank you for providing the opportunity for the Sierra Club Loma Prieta Chapter Sustainable Land Use Committee to comment on the NOP for the MSASP DEIR. As an environmental organization working towards reducing local greenhouse gas emissions, we encourage the development of higher density, mixed-use development near major transit stations.

Once the DEIR is released to the public, the Sierra Club's Sustainable Land Use Committee will evaluate it using our Guidelines for Downtown and Station Area Plans [<http://lomaprieta.sierraclub.org/sustain/guidelines>] to decide whether it will qualify for Sierra Club endorsement. Meanwhile we have some issues that we ask you to include in the upcoming DEIR.

**1. Approval of Urban Republic and Serra Properties proposals** - We understand the project-specific DEIR for these two developments will be done in parallel with approval of the overall MSASP DEIR. We are still concerned that these two projects are being considered congruent with the overall station area plan and seem to be having a disproportionate influence on the final elements of the MSASP. We urge you to consider the MSASP as a stand-alone document separate from these two proposals. Our concern is that the potential maximum commercial square footage, mixed-uses, and residential densities that are most appropriate for this Station Area Plan in this location will not be met by these two proposals which seem less dense than they might be. This site, adjacent to the only major multi-modal station on the Peninsula, should be developed to its maximum density to truly support the transit options available to it. Develop the MSASP first and ask these two developers to present proposals that conform to the Plan rather than the other way around.

**2. El Camino Real & East Millbrae Avenue** - The vital pedestrian access routes needed to make this plan work are very problematic and the DEIR should specifically address the environmental and safety benefits of a variety of options for improving these two major arteries including a pedestrian/bike bridge over El Camino Real and a pedestrian/bike undercrossing of E. Millbrae Avenue as suggested in the 1998 MSASP. The DEIR should also include a thorough examination of street storm water control systems and their impacts on ground water and Bay water pollution, along with a study of different options for Sustainable/Complete Streets designs to improve public safety, reduce air and water pollution, and reduce Greenhouse Gas Emissions (GHG).

El Camino Real is currently three lanes each way - a very busy street which is a major impediment to pedestrians and bicyclists trying to cross from the multi-modal center to properties west of El Camino. The evolving MSASP shows enhanced at-grade street crossings at Victoria Avenue, Millbrae Avenue, and Murchinson Drive, but no direct crossing from the multi-modal station to the west side of El Camino Real. This requires pedestrians and bicyclists to take a circuitous route to cross El Camino. The 1998 Specific Plan included a potential pedestrian bridge overcrossing of El Camino in alignment with a new pedestrian plaza between the Caltrain station and El Camino. Such a bridge would solve the pedestrian crossing problem and should be included in the MSASP and in the DEIR. The MSASP and DEIR

should also consider changes to El Camino Real which use a Sustainable/Complete Streets strategy to reduce El Camino Real to two traffic lanes each way rather than three and adding a center island, bulb outs, landscaping, and other amenities to slow traffic and improve pedestrian safety at enhanced on-grade street crossings in support of the vision put forth in the Grand Boulevard Initiative.

East Millbrae Avenue is a major physical and visual impediment to integrating the Plan areas north and south of E. Millbrae Avenue. The current Plan relies on Rollins Road to connect the two sides, but that will require a safe and inviting auto/pedestrian/bike crossing at the intersection of Rollins Road and E. Millbrae Avenue which, given Rollins Road's close proximity to the 101 off ramp, will be difficult to do. The 1998 Specific Plan addressed this problem by including a direct 'subway' pedestrian/bicycle crossing under E. Millbrae Avenue to facilitate pedestrian and bike access to properties south of E. Millbrae Avenue. The current Republic Urban proposal does not include such a link. The MSASP and the DEIR should include an analysis of a direct, attractive and safe pedestrian-priority connection between properties north and south of E. Millbrae Avenue.

### **3. Promote walking, biking, and transit-use as projects are developed within the MSASP**

- a. **Traffic impacts:** The DEIR should not use Level of Service (LOS) to determine traffic impacts. State Law SB743<sup>1</sup> directed the Governor's Office of Planning and Research to amend the CEQA Guidelines for Environmental Impact Reports to revise the way traffic impacts are studied<sup>2</sup>. The DEIR traffic impact study should analyze mode share for all four mobility modes – walking, bikes, transit, and autos – to determine the impacts this mix of travel modes will have on auto vehicle miles traveled (VMT), and the overall environmental, health, and safety impacts of all four modes on the people who use them. It should not study the potential traffic impacts on specific intersections (LOS) which places the efficiency of auto use above all other modes. Every person who walks, bikes, or uses transit to move from place to place is one person who is not using a personal automobile, thus VMT, traffic congestion, pollution, and GHG emissions are reduced and individual health is improved.
- b. **Assure pedestrian safety:** The DEIR should include the environmental, health, and safety benefits that will come from requiring that pedestrian convenience be the primary design criteria, with bicycles second, transit third, and autos last.
- c. **Walks:** The MSASP and DEIR should study alternative ways to provide pedestrian walkways that are wide and protected from traffic by landscaped strips, parked cars, bollards, or other methods, to determine which approaches are most likely to improve pedestrian use and safety. They should further include the safety benefits (reduced accidents) of enhanced street pedestrian crossings and curb bulb-outs which shorten the time pedestrians are in the cross walk.
- d. **Street trees:** The DEIR should include the benefits of street trees, both for sequestration of GHG, reduction of air pollution, and shading to reduce the urban heat island effect where heat builds up from paving, buildings, and autos.
- e. **Public plazas:** The DEIR should include the environmental, health, and safety benefits of attractive pedestrian-oriented public plazas.
- f. **Block size:** The DEIR should include the circulation, GHG, and traffic reduction benefits of breaking up large building blocks with pedestrian alleés, pass through lobbies, or pathways every 50' in order to make walking the most convenient, fastest, and most pleasurable mode of transportation to get around<sup>3</sup>.
- g. **Traffic speed:** The DEIR should include the safety benefits of limiting traffic speed in pedestrian-priority areas to 15 mph maximum. Studies show that pedestrian vs. auto fatalities are greatly reduced at this speed.
- h. **Improve bus stops:** The DEIR should study the impacts on bus ridership based on bus stop design. Bus stops should include benches or seats in rain-protected shelters with nighttime illumination. Attractive stops will attract the maximum number of riders thus reducing GHG emissions and single-occupancy vehicle pollution.

- i. **Free Transit Passes:** The DEIR should include the impacts on transit ridership when every tenant (residential and commercial) is provided with a free transit pass for the first five years or more of tenancy to encourage transit use. The more people ride mass transit, the fewer vehicles are on the roads and VMT, air pollution and GHG emissions are reduced. This helps meet BAAQD air quality standards. This requirement is being implemented in many cities as part of their CAP in order to meet state law mandates for Air Quality goals.
- j. **Bicycle master plan:** The DEIR should include the mode share of bicycle use and its impact on circulation and traffic if bike routes within the MSASP connect directly with the city's overall bicycle route system vs. if bike circulation within the MSASP is not directly connected to the city's overall bicycle routes<sup>4</sup>. More people will choose to ride bikes if there are clearly designated and connected bike routes throughout the city. Discontinuous bike routes discourage bike ridership.
- k. **Bike Parking:** The DEIR should include the impacts on bicycle use depending on the number and type (secure or insecure) of bike parking spots provided for residents, public, and guest parking throughout the MSASP. Every bike used, removes one person from driving their car thus reducing air pollution and GHG emissions.
- l. **Bike share:** The DEIR should include how bike share on-site or within 3 blocks of the development can increase bike use and reduce air pollution, VMT and GHG emissions.
- m. **Shuttles and car share:** The DEIR should include how public or employee shuttle stops and car-share parking on-site or on adjacent streets can help commuters make the "last mile" connection to their place of work or home without using a car. This reduces air pollution, VMT, and GHG emissions and can help the city meet its Climate Action Plan obligations.

**4. Housing Density and Affordable Housing** - The DEIR should include how much housing is needed to support the retail stores anticipated in the MSASP and what type of housing is best suited to increase transit ridership. Special emphasis should be placed on how much, and what types of affordable housing is needed to support lower-income workers who serve the local economy. Affordable housing close to transit allows lower-income workers to get to work without use of a car which assures mobility equality and reduces VMT, air pollution and GHG emissions. Sierra Club *Guidelines* set out a minimum of 40 units per acre of housing with 15% minimum affordable.

**5. Reduced Parking** – The DEIR should include a study of the relative costs and benefits of various types of structured and unstructured parking spaces and the impacts if parking spaces are reduced and the monies saved used to build more retail, commercial and residential space. What is the impact if the number of parking spaces per unit is reduced to one car per unit or less with the money saved by constructing less parking used to build additional housing units and to support related community benefits such as child care and green space<sup>5</sup>

Please refer to the Sierra Club's White Paper: Recommendations for Housing Affordability, Reduced Parking Cost and Congestion for further strategies for reducing parking [ <http://lomaprieta.sierraclub.org/sustain/guidelines> ] (bottom of page). The impacts of each of these strategies should be studied to determine how much they might contribute to reducing VMT, air pollution and GHG emissions, and aid the city in meeting its CAP goals.

- a. **Reduced parking ratio:** Analyze the environmental impacts of a parking ratio of one car per unit or less<sup>6</sup>.
- b. **Shared parking:** Include a study of the impacts when developers offer shared parking where commuters and retail customers can use on-site parking during the day and residential tenants can use the parking at night<sup>7</sup>. This reduces the overall number of parking spaces required which reduces the amount of traffic generated by the Plan thus reducing air pollution and GHG emissions, and also reduces the developer's parking costs.
- c. **Parking Permits:** Currently we understand that there is a parking permit program in some of the neighborhoods around the MSASP, but is under-funded and unenforced. The DEIR should include a study of how greater funding and enforcement of a robust neighborhood parking permit program would make reduced parking in the MSASP more acceptable to the neighbors. Opposition to unbundled and reduced parking usually come from nearby residential and commercial neighbors where free parking is provided. They express concern that residents in the MSASP will choose to park on neighboring streets rather park in

their own developments. Neighborhood objections can be overcome with a strong residential permit parking program in residential areas adjacent to new development which limits the time that unpermitted parking is allowed. Installing parking meters in commercial districts is also effective.

- d. **Unbundled parking:** Include a analysis of how unbundled parking in residential developments can reduce VMT, air pollution and GHG emissions, and make units more affordable for those who do not drive and prefer not to own a car. Unbundled parking is a useful strategy to reduce auto use and help make housing more affordable. Also, study how unbundled parking can provide a real incentive for residents to consider alternative modes of transportation by reflecting the true cost of parking thus reducing auto traffic congestion and VMT.
- e. **Parking in-lieu fee:** Include a study of how an in-lieu fee used to build nearby public satellite parking can serve the development in the MSASP. If public satellite parking is located off-site, but close by, it can reduce the number of cars that need to be parked on-site and allow some on-site areas that would have been dedicated to parking to be used to increase retail or housing units, thus increasing overall project rental and tax income.
- f. **Congestion pricing:** Analyze how traffic pollution can be reduced if the owners of the development or the city establish a congestion pricing program in, and adjacent to the MSASP to help even out parking demand at different times of the day.

## **6. Community Benefits**

- a. **Community Benefits Agreement:** Study how a community benefits agreement between developers and the city can assure that future developments within the MSASP will contribute to the overall improvement of the community. A Community Benefit Agreement outlines the development's contributions to community benefits that may include living wages, local hiring and training programs, affordable housing, preferences for retaining local businesses, day care facilities, a community meeting room, public parks and plazas, and environmental remediation, as well as funds for community programs such as shuttles, beautification, and neighborhood improvements.
- b. **Development fees:** Include a study of how a donation or payment of a development fee for community benefits such as maintenance and upgrade of on-site and off-site public parks and trails, restoration of existing natural features, and on-site agriculture or community gardens can benefit the environment and the community.

**7. Bus convenience** – Study the location(s) of planned bus stops within the MSASP. Will these bus stops encourage riders to take the bus to the multi-modal station rather than driving their cars thus reducing VMT, air pollution and GHG emissions?

**8. Lucky / Walgreens Site** – Include the Lucky / Walgreens site on Murchinson Drive in the MSASP.

**9. Sea Level Rise** Include a analysis of what impact future sea level rise will have on development in the MSASP. If significant impact is probable, what strategies to prevent flooding and storm damage are built into the Plan?

## **10. Environment, Energy, and Resource Efficiency:**

- a. **Air quality:** The DEIR should be written to assure development in the MSASP meets regional air quality goals including the requirements of BAAQMD's latest Clean Air Plan and Regional Transportation Plan for the Bay Area.
- b. **Building and site construction:** The DEIR should include a study of the impacts of all the building and construction measures the city will require within the MSASP to improvement the environment, assure energy efficiency and reduce resource use. Some strategies the city can include are:
  - 1) Meet minimum LEED Silver or 75 points Green Point Rating.

- 2) Include Net Zero Energy design for renewable energy and to meet Climate Action Plan goals (e.g. solar panels, and energy efficient fixtures).
- 3) Incorporate bird-friendly design to reduce bird deaths from collisions with buildings.
- 4) Include sustainable landscaping and/or roof top gardens to absorb GHG and reduce building heat load.
- 5) Include Class 2 electric car charging stations for at least 10% of parking spaces to reduce GHG emissions.
- 6) Deconstruct 70% minimum existing parking lots and structures so materials can be reused or recycled to reduce landfill.
- 7) Use FSC certified wood for at least 75% of wood used for construction to maintain sustainable forests.
- 8) Provide a grey water reuse program to reduce water use.
- 9) Install on-site sewage treatment facility to reduce the cost and materials used for infrastructure otherwise required to treat sewage off-site.
- 10) Incorporate Low Impact Development such as pervious paving and vegetated swales to reduce water pollution and contribute to water quality protection.

## **11. Summary of our Concerns:**

- a) Develop the DEIR with an independent eye so that the Urban Republic and the Serra Properties proposals do not unduly influence the Plan.
- b) Include alternatives for safe pedestrian crossings at both El Camino Real and E. Millbrae Avenue.
- c) Do not use LOS to determine traffic impacts. Instead use travel mode share to analyze traffic impacts.
- d) Include the positive impacts when pedestrian priority, convenience, and safety are the primary design criteria for developments within the MSASP.
- e) Include recommendations for the desired number of housing units to provide a population large enough to support the retail uses within the MSASP, and include recommendations for the desirable ratio of affordable units to market rate units to serve local employees, especially lower-income employees.
- f) Include a study of the impacts of reduced parking within the MSASP.
- g) Include a study of the costs and benefits of a Community Benefit Agreement.
- h) Include a study of the impacts of bus stop design and locations on overall bus use.
- i) Include the Lucky / Walgreens site in the MSASP.
- j) Include potential impacts of future sea level rise.
- k) Include a study of what design criteria will be used to promote environmental, energy, and resource efficiency.

Thank you for considering our recommendations for what should be included in the MSASP DEIR. We look forward to reviewing the draft when it is issued.

Respectively Submitted,

Gladwyn D'Sousa  
 Sustainable Land Use Committee  
 Sierra Club Loma Prieta Chapter  
 Contact person: David Crabbe [dcarch@comcast.net]

<sup>1</sup> Excerpts from Executive Summary of Senate Bill SB743.

"On September 27, 2013, Governor Brown signed [Senate Bill 743](#) (Steinberg, 2013). Among other things, SB 743 creates a process to change the way we analyze transportation impacts under the California Environmental Quality Act (Public Resources Code section 21000 and following) (CEQA). Currently, environmental review of transportation impacts focuses on the delay that vehicles experience at intersections and on roadway segments. That delay is often measured using a metric known as "level of service," or LOS. Mitigation for increased delay often involves increasing capacity (i.e. the width of a roadway or size of an intersection), which may increase auto use and emissions and discourage alternative forms of transportation. Under SB 743, the focus of transportation analysis will shift from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks and promotion of a mix of land uses".

"SB 743 requires the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines (Title 14 of the California Code of Regulations sections and following) to provide an alternative to level of service for evaluating transportation impacts. The alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (New Public Resources Code Section 21099(b)(1).) Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

<sup>2</sup>Excerpt from draft of changes to the CEQA Guidelines implementing SB 743. (Emphasis in bold by Sierra Club).

"Subdivision (b)(1) also gives examples of projects that might have a less than significant impact with respect to vehicle miles traveled. For example, **projects that locate in areas served by transit, where vehicle miles traveled is generally known to be low, may be considered to have a less than significant impact.** (See, e.g., California Air Pollution Control Officers Association, "[Quantifying Greenhouse Gas Mitigation Measures](#)," (August 2010).) Further, projects that are shown to decrease vehicle miles traveled, as compared to existing conditions, may be considered to have a less than significant impact. Such projects might include, for example, the addition of a grocery store to an existing neighborhood that enables existing residents to drive shorter distances. Notably, in describing these factors, the Guidelines use the word "may" to signal that a lead agency should still consider substantial evidence indicating that a project may still have significant vehicle miles traveled impacts. For example, the addition of regional serving retail to a neighborhood may draw customers from far beyond a single neighborhood, and therefore might actually increase vehicle miles traveled overall. **Similarly, a project located near transit, but that also includes a significant amount of parking might indicate that the project may still generate significant vehicle travel".**

<sup>3</sup>BART's *Transit Oriented Development Guidelines*, [[www.bart.gov/sites/default/files/docs/TOD\\_Guidelines.pdf](http://www.bart.gov/sites/default/files/docs/TOD_Guidelines.pdf)] Guideline 10, states: "The size and layout of blocks near the station should anticipate the need for direct pedestrian paths". Para. 10 also includes a diagram showing how "New sidewalks can give pedestrians "shortcuts" through the station area making it more walkable"..

<sup>4</sup>BART's *Transit Oriented Development Guidelines*, Guideline 2, states: "BART stations should be served by ... bicycle routes that extend beyond the immediate station area".

<sup>5</sup>BART's *Transit Oriented Development Guidelines*, Guideline 6, states: "BART stations should be located in active, walkable, developed areas that can support ridership growth **with reduced reliance on additional parking**". (emphasis by Sierra Club)

<sup>6</sup>BART's *Transit Oriented Development Guidelines*, Guideline 30, states: "Residential parking provisions should generally be lower in a BART TOD than in neighborhoods further from BART". BART's Guideline 33 states: "Parking provisions for commercial use in the station area should generally be lower than provisions for commercial uses further from BART".

<sup>7</sup>BART's *Transit Oriented Development Guidelines*, Guideline 26, states: "BART parking facilities should be sized and located to enhance shared-use strategies with other station area destinations whose periods of demand compliment BART's".



# CALIFORNIA

## High-Speed Rail Authority

Northern California Regional Office

November 21, 2014

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CHIEF EXECUTIVE OFFICER

Mr. Marty Van Duyn  
Community Development Project Manager  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030

Transmitted via E-mail to [mvanduyn@ci.millbrae.ca.us](mailto:mvanduyn@ci.millbrae.ca.us)

Dear Mr. Duyn:

The California High-Speed Rail Authority is pleased to continue our ongoing work with the City of Millbrae to craft a Specific Plan Update that will redefine a vision for the 116 acres in the vicinity of the Millbrae BART/Caltrain (and future high-speed rail) station. We are optimistic that continued investment in clean, convenient transportation options will spark economic development in Millbrae and improve the quality of life of its residents and visitors. Matching that investment with appropriate land-use planning is critical to ensure that the Millbrae Station becomes a vibrant travel crossroads.

Creating a vibrant transportation hub that leverages private investment into more pedestrian-scale development and reduces reliance on the automobile will require keen attention to both quantitative and qualitative details. We request that the City of Millbrae's EIR include thorough evaluation of the indirect impacts of parking and multimodal station access. We look forward to working with the city on those topics, as well as assessing space requirements in and around the station for rail and transit patrons.

Thank you. I look forward to working with you to plan and develop the Millbrae Station area.

Sincerely,

  
Ben Tripousis  
Northern California Regional Director  
(408) 447-5631  
[ben.tripousis@hsr.ca.gov](mailto:ben.tripousis@hsr.ca.gov)

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November 21, 2014

Marty Van Duyn  
 Community Development Project Manager  
 Community Development Department  
 621 Magnolia Avenue  
 Millbrae, CA 94030

Dear Mr. Van Duyn:

**Re: NOP of Draft Environmental Impact Report for the Millbrae Station Area Specific Plan Update and Millbrae Transit-Oriented Development Projects**

The San Mateo County Transit District (SamTrans) appreciates the extended opportunity to provide comments on the Notice of Preparation (NOP) of the Draft Environmental Impact Report (EIR) for the Millbrae Station Area Specific Plan Update (MSASP) and Millbrae Transit-Oriented Development (TOD) Projects. We value our strong working relationship with the City and look forward to continuing to partner with you on your efforts to redefine the station area.

This letter supplements our comments on October 17, 2014 and focuses on ensuring that the Draft EIR helps protect this intermodal station's critical role in accommodating the region's growth.

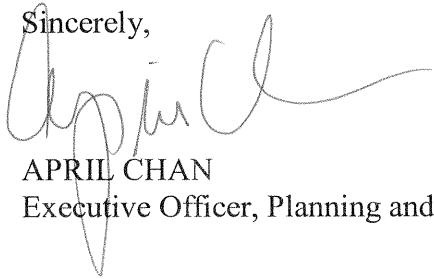
1. At a programmatic level, the EIR should address whether there is sufficient capacity and access for transit and other modes to support the EIR's trip generation, mode split, trip distribution and assignment assumptions that are critical to the traffic impact analysis. This capacity and access should be consistent with existing agreements governing right-of-way.
2. The traffic analysis' trip generation and parking demand assumptions should be consistent with ridership growth forecasts from Caltrain, BART, and other transit services.
3. Transportation enhancements needed to accommodate and mitigate impacts from build-out of the Plan should be contemporaneous with development throughout the MSASP.
4. Because of the distinct nature of travel and access needs on each side of the rail corridor, impacts should be mitigated locally where possible (e.g., impacts on Site 1 should be mitigated on Site 1).

Mr. Van Duyn  
November 21, 2014  
Page Two

5. Because of the lack of project-specific information on TOD 1 and TOD 2, we are not able to provide specific comments, but look forward to continuing to work with you on defining conceptual site plans for both.

We support the City's cooperative effort to work with SamTrans, Caltrain, BART, and the developers to develop Station and TOD plans that accommodate a variety of access modes and connections to Caltrain, SamTrans and BART. We look forward to working with you to achieve this goal.

Sincerely,

A handwritten signature in black ink, appearing to read "April Chan".

APRIL CHAN  
Executive Officer, Planning and Development

From: dcarch@comcast.net [mailto:dcarch@comcast.net]  
Sent: Monday, November 24, 2014 12:42 PM  
To: mvanduyn@ci.millbrae.ca.us  
Cc: D'Souza, Gladwyn; Dev, Gita; Adina Levin; McClure, Bonnie; Rosales, Kenneth  
Subject: Millbrae DEIR NOP (Addendum)

Mr. Van Duyn:

This is an addendum to our NOP letter sent earlier. Under Para. 2, we recommended consideration of a pedestrian bridge over El Camino Real opposite the multi-modal station. It has been pointed out to us that such a bridge would require ADA access which could be quite difficult to achieve especially on the west side of El Camino. We therefore withdraw our recommendation for a bridge; however, we still recommend the under crossing at E. Millbrae Avenue.

Instead of a bridge, we feel Millbrae needs a wider median at El Camino Real (ECR) where it meets Millbrae Ave., & each direction from there, especially north with more frequent electric signals for pedestrians including a pedestrian/bike crossing in front of the multi-modal station. We also recommend that ECR include bike lanes and un-loading spaces for pedestrians who are being dropped off at the BART & RR station. Parking drop-off lanes should be limited to 5 minutes only within walking distance of the station. We assume there are bus and taxi spaces inside the station area, but quick off-loading on ECR could eliminate traffic tie ups at the intersection. If the crossings of ECR are well signaled and the median wide enough, people will feel safe to cross the street and wait on the median if necessary. The extra signaling would slow traffic as well. ECR is exceptionally wide in Millbrae and intimidating to pedestrians. It would much better to have well marked street level pedestrian crossings with electric signals and a wide median in the middle.

David Crabbe  
Sierra Club Sustainable Land Use Committee



November 24, 2014

Marty Van Duyn  
Community Development Project Manager  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030

**Subject: Notice of Preparation for the Millbrae Station Area Specific Plan Update Environmental Impact Report**

Dear Mr. Van Duyn:

On behalf of the San Francisco Bay Trail Project, I am submitting comments on the Notice of Preparation for the Millbrae Station Area Specific Plan Update Environmental Impact Report. The San Francisco Bay Trail (Bay Trail) is a visionary plan for a shared-use bicycle and pedestrian path that will one day allow continuous travel around San Francisco Bay. Currently, 340 miles of trail have been completed. Eventually, the Bay Trail will extend over 500 miles to link the shoreline of nine counties, passing through 47 cities and crossing seven toll bridges.

Existing Bay Trail in Millbrae is located along the Shoreline at Bayfront Park east of Highway 101, just outside of the Specific Plan eastern boundary (see attached **Map A**). From Bayfront Park heading south, *over 25 miles* of continuous Bay Trail, except for two minor gaps in Burlingame, extend through six cities to the San Carlos Airport. This trail provides a valuable multi-jurisdictional long-distance recreation and commute corridor along the edge of the shoreline. Extending this trail north through Millbrae to the BART station and around the San Francisco International Airport to existing trail in San Bruno and South San Francisco is an important regional recreation and transportation goal.

### **Specific Plan**

A segment of proposed Bay Trail is located within the Millbrae Station Area Specific Plan boundaries (see attached **Map B**). The exact alignment of the Bay Trail segment is not yet known, so the Specific Plan recreation/transportation map should allow for a variety of options to extend the trail to the north.

The following policies are suggested for inclusion in the Specific Plan Environmental Impact Report:

- Create an environment that encourages walking and bicycling for people of all ages and abilities by building paved trails separated from vehicle traffic

- Construct a bicycle/pedestrian bridge over Highway 101 parallel to Millbrae Avenue that provides a safe and direct connection to Millbrae's San Francisco Bay shoreline
- Complete the Bay Trail as a path separated from traffic within the Specific Plan area and allow for future connections beyond the plan boundaries
- Encourage non-vehicular commuting to and from the Millbrae BART/Caltrain station by implementing effective strategies and amenities that promote the use of alternative transportation modes
- Provide trail connections between the Millbrae BART/Caltrain station and adjacent neighborhoods
- Provide bicycle/pedestrian connections between the Bay Trail spine and the development sites.
- Provide parks, landscaping and open space to create inviting public spaces for residents, workers, commuters and visitors.

### **Millbrae TOD #1 and #2 Projects**

The Millbrae TOD #1 and #2 Projects will bring a significant level of new activity to this area including permanent residents, shoppers, travelers and office workers. The project should be constructed in a way to encourage bicycle and pedestrian transportation to, from, and within the sites and the gap in the Bay Trail should be completed as part of these development projects. Attached **Map C** identifies a proposed Bay Trail alignment along the edge of both development sites.

The following are suggested for consideration in the Environmental Impact Report as part of the Millbrae TOD #1 and #2 Projects addressing potential Parks and Recreation and Transportation impacts:

- Construct the Bay Trail around the perimeter of the development sites between the existing trail at Hillcrest and the touchdown of the planned Millbrae Avenue bicycle/pedestrian bridge over Highway 101.
- Facilitate developer contribution to the planned bicycle/pedestrian bridge adjacent to Millbrae Avenue over Highway 101.
- Ensure that the entire Bay Trail alignment is a Class I Multi-Use pathway in order to complete separate trail users from traffic.
- Emphasize the importance of bicycle commuting to and from the project area and connections to transit.

The following plans/studies are relevant to the Bay Trail alignment in Millbrae and should be referenced in the Specific Plan and used to develop conditions of development.

- 1) BART Trail Segment Master Plan, 2004, City of Millbrae
- 2) San Francisco Airport Feasibility Study, 1997-1998, 2M Associates
- 3) San Francisco Bay Trail Plan, 1989, Association of Bay Area Governments

Thank you for considering these comments. Please contact me at 510-464-7935 or [laurat@abag.ca.gov](mailto:laurat@abag.ca.gov) if you have questions about this letter or the Bay Trail in general.

Sincerely,



Laura Thompson  
Bay Trail Project Manager

Attachments: Map A, Map B, Map C

# MAP A

There is a 4-mile gap in the Bay Trail between San Bruno and Millbrae.

Millbrae Station Area Specific Plan: includes a segment of proposed Bay Trail

Over 25 miles of continuous Bay Trail exist between Millbrae and San Carlos.



## MAP B



## MAP C



From: Chuck FANCHER [mailto:fancherco@msn.com]  
Sent: Tuesday, November 25, 2014 10:47 AM  
To: mvanduyn@ci.millbrae.ca.us  
Cc: blake.pogue@ppc-usa.com; Dan Rogers  
Subject: Millbrae station Area Specific Plan Update EIR

Mr. Van Duyn – as Owners in Equity of 10 El Camino Real, a parcel owned in fee by P&T Millbrae, LLC, Fancher Partners LLC and PPC Land Ventures, Inc. wish to record a comment addressing the scope or content of the EIR being conducted for Site One.

As the Specific Plan Update identifies uses and densities that can be supported under anticipated future development scenarios, and given that there are multiple parcels owned by different ownership interests within the Specific Plan area, it is important that the EIR analysis, and the subsequent zoning entitlements, address how the supportable or allowable densities can be equitably allocated among the parcels and unaffiliated owners so as to prevent an outcome in which parcels being developed later subsequent to entitlements are not faced with use rights being exhausted by prior developing parcels usurping available density quantities.

A solution to this potential inequity is not found in an assumption that surplus densities (densities greater than the market or the parcels can absorb or facilitate) may be entitled by the City. That presumption based on some presumptive forecast, if considered, cannot be relied upon to insure equitable distribution of development rights among parcels if for the only reason that certain entitled uses have greater economic value than others and those having greater value will be usurped before those having lesser value will be consumed. The City, through its entitlements may have to devise some form of “Transferable Development Rights” assigning proportionate development rights among all the entitled uses to all of the affected parcels, which could better insure that later developing parcels are not exposed to having their Specific Plan development rights diluted by early developing parcels usurping the densities. TDR’s, simply presented as a potential solution, are utilized in other states and cities and appear to have legal precedent to address prospective inequities in the utilization of use rights among multi-parcel districts.

This request is presented by Charles E. Fancher, Jr. and J. Blake Pogue, officers, respectively for Fancher Partners, LLC and PPC Land Ventures, Inc. Dan Rogers, as broker, is requested to forward this email to P&T Millbrae, LLC.

We would appreciate confirmation that our comment will be included in the EIR record. Thank you.



**Fancher Partners, LLC**  
Lifestyle Real Estate Development



**Mall Business, LLC**  
Regional Mall Repositioning

**Charles E. Fancher, Jr.** (949) 955-7999 [www.fancherpartners.com](http://www.fancherpartners.com)

Newport Plaza, 895 Dove Street, 3<sup>rd</sup> Floor, Newport Beach, CA 92660

RECEIVED

CC: Council  
MR  
MVD

DEC - 2 2014

December 2, 2013

CITY OF MILLBRAE  
ADMIN DEPT.

City Council  
City of Millbrae  
621 Magnolia Ave.  
Millbrae, CA 94030

Dear Council Members:

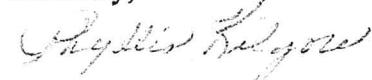
A Millbrae contract employee has told me that a bicycle path will be part of the development at Millbrae BART. However, he could not show me where it will be because the plans are not yet drawn.

Where would the bicycle path go? To El Camino Real? The development is practically on El Camino Real.

The bicycle path certainly **should not** go through Bayside Manor. The streets are too narrow for the addition of a bicycle path. A bicycle path would be a major safety nightmare for pedestrians, cars and bicycles.

I am hoping careful consideration on your part will prevent a bicycle path through Bayside Manor from happening. Thank you.

Sincerely,



Phyllis Kilgore  
311 Aviador Ave.  
Millbrae, CA 94030

Cc: Angela Louis, City Clerk  
Millbrae City Hall  
621 Magnolia Ave.  
Millbrae, CA 94030



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Western-Pacific Region  
San Francisco Airports District Office

1000 Marina Blvd., Suite 220  
Brisbane, CA 94005-1835

December 1, 2014

Marty Van Duyn  
Community Development Project Manager  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030



Subject: Millbrae Station Area Specific Plan Update; Environmental Impact Report -  
Notice of Preparation Comments

Dear Ms. Van Duyn:

We are responding to the City of Millbrae's (City) Environmental Impact Report Notice of Preparation (NOP) for the Millbrae Station Area Specific Plan Update (Specific Plan Update) issued on September 19, 2014. The Specific Plan Update is redefining the development plan for an area adjacent to the Millbrae Bay Area Rapid Transit (BART)/Caltrain Station at Millbrae Avenue. The City is considering a plan that provides for mixed use Transit-Oriented Development (TOD) that includes office, residential, hotel, open space, retail uses, and relocation of the existing BART parking lot and intermodal facility to accommodate the new development. The City's overall plan area is approximately 116 acres generally bounded by Broadway to the west, Victoria Avenue and the Highline Canal limit to the north, the Highway 101 interchange including a portion of McDonnell Road to the east, and the City of Burlingame to the south. Within the overall plan area there are two TOD project areas: TOD #1 identified as the Millbrae Serra Station properties and TOD #2 the BART – owned site.

We are confirming the input that the Federal Aviation Administration (FAA) provided to the City during the Workshop Technical Committee meetings. The FAA is concerned about, and would not concur with, any development proposals that could impact the safety and efficiency of existing and future aviation operations of San Francisco International Airport (SFO) or its property. Applicable standards include Federal Aviation Regulation Part 77 Objects Affecting Navigable Airspace (Part 77) and Advisory Circular (A/C) 150/5300-13A, *Airport Design*, approach/departure standards. Prior to proceeding with development of any Specific Plan Update, Part 77 requires that the project proponent file a FAA Form 7460-1, Notice of Proposed Construction or Alteration for completion of an Obstruction Evaluation/Airport Airspace Analysis (OE/AAA). Information for the OE/AAA and Form 7460-1 is located at: <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>.

We encourage the City to consider and abide by the *Airport Land Use Compatibility Plan (ALUCP) for Environs of San Francisco International Airport, November 2012*, which identifies applicable development and use standards for properties adjacent to and within airport property. Also, in order to avoid erroneous encroachment or other adverse effect to airport property, clearly identify the SFO property boundary within all project graphics, such

as Figure 2 – Project Boundaries. The City is responsible for ensuring that all proposed adjacent uses have no negative impact on SFO property.

The TOD #1 and TOD #2 would introduce 1,750 new residential units and 360 hotel rooms in an area beyond the Community Noise Equivalent Level 65 decibel contour of SFO. However, the area is subject to existing and future aircraft arrival or departure overflights, and noise from SFO operations will continue to be experienced in the area. We recommend that the residential and hotel structures be designed to ensure an acceptable interior noise level is maintained in the units and that aviation noise and airport location disclosures be included within the property profiles to avoid future complaints.

Due to the proximity of the site to SFO and the arrival and departures from Runways 1L and 1R, we request that the Specific Plan Update ensure that the proposed land use changes including any landscape features will not be permitted to become wildlife attractants. FAA A/C 150/5200-33B, *Hazardous Wildlife Attractants On or Near Airports*, identifies land-use practices and features that have the ability to attract hazardous wildlife to the vicinity of aviation operations. The A/C is available at the FAA website: [www.faa.gov](http://www.faa.gov).

We recommend that the City include the City/County Association of Governments of San Mateo County, Airport Land Use Commission in the NOP, Section 2 – Public Agency Approvals list due to the project location within the SFO ALUCP. Additionally, NOP Section 3 - Environmental Factors Potentially Affected, should include aviation activity or airport land use considerations in the Land Use and Planning, Noise, Population and Housing, Parks and Recreation, and Transportation and Traffic sections of the Environmental Impact Report (EIR).

We encourage the City to coordinate with Jon Bergener, Airport Planning Manager for SFO during the preparation of the EIR.

Your attention to these matters is appreciated. If you have any questions that you would like to discuss, I am available by phone at (650) 827-7601 or by email at [Dave.Cushing@faa.gov](mailto:Dave.Cushing@faa.gov); or you may reach Fernando Yanez, Airport Planner, at (650) 827-7615 or [Fernando.Yanez@faa.gov](mailto:Fernando.Yanez@faa.gov); or Camille Garibaldi, Environmental Protection Specialist at (650) 827-7613 or [Camille.Garibaldi@faa.gov](mailto:Camille.Garibaldi@faa.gov).

Sincerely,



David F. Cushing  
Acting Manager, San Francisco Airport District Office

cc:

John Martin, San Francisco International Airport  
John Bergener, San Francisco International Airport