

5. Comments and Responses

This chapter includes a reproduction of, and responses to, each letter received during the public review period. Comments are presented in their original format in Appendix A, along with annotations that identify each comment number. Responses to those individual comments are provided in this chapter alongside the text of each corresponding comment. Letters follow the same order as listed in Chapter 4, List of Commenters, of this Final EIR and are categorized by:

- A. Agencies and Service Providers
- B. Private Individuals and Organizations

Where the same comment has been made more than once, a response may direct the reader to another numbered comment and response. Where a response requires revisions to analysis presented in the Draft EIR, these revisions are explained and shown in Chapter 3, Revisions to the Draft EIR, of this Final EIR.

Exhibits referenced in responses to comments are included in the commenters' original comment letters and are included in Appendix A of this Final EIR.

MASTER RESPONSE

In order to minimize duplication and to provide a more comprehensive discussion, a “Master Response” has been prepared for comments that are outside the scope of the Draft EIR and CEQA. Responses to individual comments reference this Master Response as appropriate. The Master Response is intended to provide a general response to several comments on the given subject. The Master Response may provide more information than requested by any individual comment. Conversely, the Master Response may not provide a complete response to a given comment, and additional information may be contained in the individual response to that comment. The Master Response is provided below.

STANDARDS FOR RESPONSES TO COMMENTS, AND FOCUS OF REVIEW OF COMMENTERS

PROJECT MERITS

Often during review of an EIR, the public raises issues that relate to qualities of the project itself or the project's community consequences or benefits, personal wellbeing and quality of life, and economic or financial issues (referred to here as “project merits”), rather than the environmental analyses or impacts and mitigations raised in

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the EIR. However, consistent with the California Environmental Quality Act (CEQA) Guidelines Section 15131, Economic and Social Effects, the Draft EIR is not meant to address these issues, rather, the purpose of CEQA and the Draft EIR is to fully analyze and mitigate the project's potentially significant physical impacts on the environment to the extent feasible.

In accordance with Sections 15088 and 15132 of the State CEQA Guidelines, a Final EIR must include a response to comments on the Draft EIR pertaining to environmental issues analyzed under CEQA. Several of the comments provided in response to the Draft EIR express an opinion for or against the project or a project alternative, but do not pertain to the adequacy of the analysis or conclusions in the Draft EIR. Rather, these opinions relate to the merits of the project.

Lead Agency review of environmental issues and project merits are both important in the decision of what action to take on a project, and both are considered in the decision-making process for a project. However, as part of the environmental review process, a Lead Agency is only required by CEQA to respond to environmental issues that are raised. The Planning Commission and City Council will hold publicly noticed hearings to consider action on the merits of the project for approval or disapproval. The Planning Commission and City Council will consider both the EIR and project merit issues that have been raised.

Section 15204(a) of the State CEQA Guidelines provides direction for parties reviewing and providing comment on a Draft EIR, as follows:

In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

Therefore, in accordance with Section 15204(a), the City is not required to respond to comments that express an opinion about the project merits, but do not relate to environmental issues covered in the Draft EIR. Although such opinions and comments on the project merits that were received during the EIR process do not require responses in the EIR, as previously noted, they do provide important input to the process of reviewing the project overall. Therefore, merits and opinion-based comment letters are included in the EIR to be available for consideration by the decision-makers at the merits stage of the project.

SPECULATION WITHOUT SUBSTANTIAL EVIDENCE

Various comments assert or request that impacts should be considered significant or that significance conclusions of the EIR should be revised, but fail to provide substantial evidence in support of their assertion. Predicting the

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project's physical impacts on the environment without firm evidence based on facts to support the analysis would require a level of speculation that is inappropriate for an EIR.

CEQA Section 21082.2(a) requires that the Lead Agency “shall determine whether a project may have a significant effect on the environment based on substantial evidence in light of the whole record.” CEQA Guidelines Section 15384(a) clarifies that “ ‘substantial evidence’... means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency. Argument, speculation, unsubstantiated opinion or narrative evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment, does not constitute substantial evidence.” CEQA Guidelines Section 15384(b) goes on to state that “substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.” Where there are no facts available to substantiate a commenter's assertion that the physical environment could ultimately be significantly impacted as a direct result of the project, the City acting as the Lead Agency is not required to analyze that effect, nor to mitigate for that effect. Section 15204(c) of the CEQA Guidelines advises reviewers that comments should be accompanied by factual support:

Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

Under CEQA, the decision as to whether an environmental effect should be considered significant is reserved to the discretion of the Lead Agency based on substantial evidence in the record as a whole. The analysis of the Draft EIR is based on scientific and factual data, which has been reviewed by the Lead Agency and reflects its independent judgment and conclusions. CEQA permits disagreements of opinion with respect to environmental issues addressed in an EIR. As Section 15151 of the CEQA Guidelines states, even “[d]isagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts.”

CEQA Guidelines Section 15145 provides that:

If, after thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.

ADDITIONAL ANALYSIS

During the review period for the Draft EIR, members of the public submitted comments that requested additional analysis, mitigation measures, or revisions that are not provided in the Final EIR for reasons more specifically addressed in the individual comments. As described above, Section 15204(a) of the CEQA Guidelines provides that CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters.

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Section 15003 also explains the emphasis of CEQA upon good-faith efforts at full disclosure rather than technical perfection:

(i) CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure. A court does not pass upon the correctness of an EIR's environmental conclusions, but only determines if the EIR is sufficient as an informational document. (Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692).

(j) CEQA requires that decisions be informed and balanced. It must not be subverted into an instrument for the oppression and delay of social, economic, or recreational development or advancement. (Laurel Heights Improvement Assoc. v. Regents of U.C. (1993) 6 Cal.4th 1112 and Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553).

Sections 15204(a) and 15003 reflect judicial interpretation of CEQA. Under CEQA, lead agencies need only respond to significant environmental issues, and do not need to provide all information requested by reviewers, so long as a good faith effort at full disclosure is made in the EIR.

Responses to individual comments are presented in Table 5-1. Individual comments are reproduced from the original versions in Appendix A, along with the comment numbers shown in the appendix, followed by the response.

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TABLE 5-1 RESPONSE TO COMMENTS MATRIX

Number	Comment	Response
AGENCIES AND SERVICE PROVIDERS		
A1	Philip Crimmins, Aviation Environmental Specialist, California Department of Transportation, Division of Aeronautics	
A1-1	<p>The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety, noise, and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports. The following comments are offered for your consideration.</p> <p>The proposed project is for the adoption and implementation of the Millbrae Station Area Specific Plan and the construction of two transit oriented developments. The projected buildout summary of the project indicates that various land uses will be developed including office and retail buildings, multi-family residential units and hotel rooms. The project site is located approximately 1,900 feet southwest of Runway 1R at San Francisco International Airport (SFO).</p> <p>In accordance with CEQA, Public Resources Code Section 21096, the California Airport Land Use Planning Handbook (Handbook) must be utilized as a resource in the preparation of environmental documents for projects within airport land use compatibility plan boundaries or if such a plan has not been adopted, within two miles of an airport. The Handbook is a resource that should be applied to all public use airports and is available on-line at http://www.dot.ca.gov/hq/planning/aeronaut/documents/AirportLandUsePlanningHandbook.pdf. In accordance with California Public Utilities Code (PUC) Section 21676 et seq., prior to the amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within the planning boundary established by the airport land use commission (ALUC), the local agency shall first refer the proposed action to the ALUC.</p> <p>If the ALUC determines that the proposed action is inconsistent with the airport land use compatibility plan, the referring agency shall be notified; The local</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The City is aware of the procedures described by the commenter and is currently in the process of having the Millbrae Station Area Specific Plan Update reviewed by the ALUC prior to adoption of the Specific Plan Update for a determination of consistency with the ALUCP.</p> <p>Chapter 3, Project Description, of the Draft EIR, provides a description of the relationship between the Specific Plan Area and The Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport is the Airport Land Use Compatibility Plan (ALUCP) for the San Francisco International Airport (SFO). Chapter 4.9, Land Use and Planning, Chapter 4.7, Hazards and Hazardous Materials, and Chapter 4.10, Noise, of this Draft EIR, describe the consistency with the SFO ALUCP land use, safety, and noise criteria, respectively. No further response is required.</p>

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TABLE 5-1 RESPONSE TO COMMENTS MATRIX

Number	Comment	Response
A2	Traci Choi, Community Builder, Housing Leadership Council of San Mateo County	
A2-1	Thank you for the opportunity to comment on the Millbrae State Area Specific Plan Update. I am writing on behalf of the Housing Leadership Council of San Mateo County (HLC). HLC works with communities and their leaders to produce and preserve quality affordable homes in San Mateo County. We seek to promote policies and plans that enable equitable growth in our communities and a viable quality of life.	The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
A2-2	We support Millbrae's efforts to encourage higher density and mixed-use development in the MSASP. However, we want to ensure that development in these high opportunity areas takes place in an equitable manner- providing balanced housing opportunities for a range of economic levels and avoiding the potential displacement of existing lower income communities living in proximity to the Plan Area. We are pleased to see that the Plan includes a policy (P-H3) to require at least 15% affordability for residential projects within the Plan Area. However, we have a number of concerns regarding the effectiveness of this policy:	The comment expresses a concern of the commenter. The basis for the commenter's concern is described in their comments that follow and each of these comments is more precisely addressed in the responses to comments provided below. The comment is acknowledged and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
A2-3	According to the DEIR, implementation of the MSASP could generate up to 1,440 new housing units. TOD #1 and TOD #2 are expected to generate 831 new housing units. However, it is unclear how many of these units will be developed as rental or ownership units.	As described in Chapter 3, Project Description of the Draft EIR in Section 3.1.5, Summary of the Total Buildout Projections, the proposed Specific Plan Update would result in a total of 1750 multi-family units of which 500 units would be within the TOD #1 project site and 321 units would be in the TOD #2 project site. As described in Chapter 3 in Section 3.3.4.4, Residential, the proposed TOD #1 project would involve construction of 500 market-rate rental apartment units and as described in Section 3.4.4.5, Residential, the proposed TOD #2 project would involve construction of 321 market-rate rental apartment units. The determination of rental or ownership units for future projects under the Specific Plan would occur on a case by case basis.
A2-4	Under the <i>Palmer v. City of Los Angeles</i> case local jurisdictions can no longer require affordability restrictions on new rental units, the 15% inclusionary requirement only applies to ownership units. Unless a significant number of residential units are developed for purchase, a 15% affordability policy would not be effective in meeting the needs of many moderate- to low- income households.	This provides background information on affordable housing law and speculates that a 15 percent affordability policy would not meet the needs of many moderate-to low-income households. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is

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TABLE 5-1 RESPONSE TO COMMENTS MATRIX

Number	Comment	Response
A2-5	<p>AB 2135- Surplus Land and Affordable Housing: These concerns also bring us to the issue of the application of AB 2135, a bill signed into law on September 27, 2014¹, which amends current law (Chapter 677) regarding surplus land and affordable housing. Existing law requires a local agency disposing of surplus land to give first priority in a purchase or lease to an entity agreeing to use the site for housing for persons of low or moderate income (Section 54222). AB 2135 amended existing law to further require an entity proposing to use the surplus land for developing low and moderate-income housing to agree to make at least 25% of total units as affordable rental or ownership units (Section 54222.5). If the price or terms cannot be agreed upon after a good faith negotiation period of at least 90 days, the land may be disposed of to any developer, but will be required to include at least 15% of the units as affordable rental or ownership units (Section 54233).</p> <p>The Department of Housing and Community Development released a memo² on March 27, 2015, summarizing that AB2135 requires:</p> <ul style="list-style-type: none"> • The qualified entity proposing purchase or lease of the surplus land for affordable housing to agree to make available to lower income households a minimum of 25% of total units at an affordable housing cost for a period of at least 55 years. <p>We urge the City and BART to abide by the new provisions of AB 2135. This would allow the City to require a minimum 25% affordability requirement for the TOD #2 site, which is anticipated to generate 321 new housing units. This would also align with both the state and city's goals of encouraging transit ridership by providing housing opportunity for people who live and work within walking distance to major transit stations. It is well documented that lower-income</p>	<p>required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. The Commenter provides an opinion about the effectiveness of the affordable housing policy in the Specific Plan Update, but provides no substantial evidence for this opinion. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p> <p>The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process.</p> <p>The proposed Specific Plan Area, and specifically the TOD #2 project site, is not considered "surplus land" as defined under applicable law as described by the Commenter and, as such, is not subject to AB 2135. As described under Government Code Section 54221, Surplus Land Act, the term 'surplus land' means "land owned by any local agency, that is determined to be no longer necessary for the agency's use, except property being held by the agency for the purpose of exchange." The TOD #2 project site is currently used for BART parking and an intermodal bus facility. The site is currently the subject of a TOD development proposal, and has not been deemed to be "no longer necessary" for use by BART.</p> <p>See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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Number	Comment	Response
	<p>communities utilize public transit at higher rates than others. We respectfully request the City to work with BART representatives and housing developers to create a development proposal that would include at least a 25% inclusionary requirement with deeper levels of affordability.</p> <p>Footnote 1: http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB2135 Footnote 2: http://www.hcd.ca.gov/housing-policy-development/docs/ab2135-ta-memo032715.pdf</p>	
A2-6	<p>We have also seen in other Downtown Station Area planning processes across the region where increased development has put significant pressures on housing costs, as landlords and property owners see an opportunity to charge a premium for their proximity to transit-accessible areas, retail, and other amenities. On a local and regional level, this has effectively codified the systematic displacement of lower-income communities living within and in close proximity to these downtown areas. We respectfully request that the City include a local analysis to consider this concern and propose robust programs to assist and protect existing residents living in and near the MSASP area.</p>	<p>Consistent with the CEQA Guidelines Section 15131, Economic and Social Effects, the Draft EIR is not meant to address quality of life, and economic or financial issues, rather, the purpose of CEQA and the Draft EIR is to fully analyze and mitigate the Project's potentially significant physical impacts on the environment to the extent feasible. Furthermore, predicting the Project's physical impacts on the environment without firm evidence based on facts to support the analysis would require a level of speculation that is inappropriate for an EIR. As described in Chapter 3, Project Description, of this Draft EIR, the proposed Specific Plan Update would allow an increase in the total number of housing units in the Specific Plan Area (1,440 net new housing units). The Specific Plan Area has one housing unit incidental to a commercial building on the TOD #1 project site that would be redeveloped to a mixed-use complex. Since implementation of the proposed Specific Plan Update would result in a net increase in housing, it would not require replacement housing outside the Specific Plan Area. Therefore, impacts related to the displacement of housing would be less than significant. Displacement of existing residents in the Specific Plan Area as a result of rising home prices or rents due to new development would be speculative given that there are no policies in the Specific Plan that stipulate rent increases or other cost increases associated with cost of living; therefore, no additional analysis is required as part of this EIR. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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Number	Comment	Response
A2-7	Thank you for your consideration and we look forward to continue working with the City through the planning process.	The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
A3	Ellen Smith, Manager, Strategic and Policy Planning, BART Planning, Development, Construction	
A3-1	Attached please find BART's letter responding to the July 21 letter from the SM County Housing Leadership Council to the Mayor and Council regarding AB 2135 and affordable housing on the BART Station property. Please contact me if you would like further information.	The comment introduces the attachments to the comment letter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
A3-2	(See attached file: Letter to SM Housing Leadership AB 2135 205 July 27.pdf) (See attached file: Letter SM Housing Leadership Council- 2015-07-21.pdf)	The comment acknowledges the attachments to the comment letter, which are provided below. The City has examined the attachments and concluded that they do not warrant any revisions to the EIR. No further response is required.
Attachment A3-1	Letter from BART to Housing Leadership Council of San Mateo County dated July 27, 2015	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
Attachment A3-2	Letter from Housing Leadership Council of San Mateo County to Mayor Robert Gottschalk and City Council Members dated July 21, 2015	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
A4	Richard M. Newman, City of Millbrae Liaison to SFO, City of Millbrae	
A4-1	Acting as the City of Millbrae Liaison to the San Francisco International Airport, I am forwarding the following materials, at the direction of City Manager Marcia Raines:	The comment introduces the attachments to the comment letter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The attachments serve as background material for the City in determining project approval. No further response is required.
A4-2	1. Letter dated July 30, 2015 from John Bergener, San Francisco International Airport (SFO) Planning Director, to Karen McDonald, Federal Aviation Administration (FAA) Southwest Regional Office, regarding several recent OE/AAA cases submitted in the City of Millbrae.	The comment acknowledges the attachments to the comment letter, which are provided below. The City has examined the attachment and concluded that they do not warrant any revisions to the EIR. No further response is required.
A4-3	2. Four letters dated July 30, 2015 from the Karen McDonald, Specialist at the FAA to Sigrid R. Waggener, each including a Public Notice of an aeronautical study and declaring that the proposed structure for the stated proposed building	The comment acknowledges the attachments to the comment letter, which are provided below. The City has examined the attachment and concluded that they do not warrant any revisions to the EIR. No further response is required.

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	in the location specified in each, exceeds obstruction standards. Each letter addresses slightly different geographical points in the same project.	
A4-4	I note that Mr. Bergener has authorized me to submit these materials as comments on both the Millbrae Station Area Specific Plan and the Millbrae Station Area Plan Update and Transit-Oriented Development #1 & #2, during the comment period. I further note that SFO intends to submit separate comments on both plans which cover a broader scope than the materials submitted today. Mr. Bergener had indicated that the questions of the applicable height standards addressed in his letter to the FAA attached hereto, have been adequately addressed in the letters from the FAA, also attached.	The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
A4-5	I would ask that these letters be accepted in the normal course of comments on the captioned plans.	The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project. The City has examined the attachments and concluded that they do not warrant any revisions to the EIR.
Attachment A4-1	Letter from SFO to Federal Aviation Administration dated July 30, 2015	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
Attachment A4-2	Letter from Federal Aviation Administration to Burke Williams & Sorenson LLP dated July 30, 2015	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
Attachment A4-3	Letter from Federal Aviation Administration to Burke Williams & Sorenson LLP dated July 30, 2015	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
Attachment A4-4	Letter from Federal Aviation Administration to Burke Williams & Sorenson LLP dated July 30, 2015	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
Attachment A4-5	Letter from Federal Aviation Administration to Burke Williams & Sorenson LLP dated July 30, 2015	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.

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Number	Comment	Response
A5	John Bergener, Planning Director, Bureau of Planning and Environmental Affairs, San Francisco International Airport	
A5-1	<p>Thank you for notifying San Francisco International Airport (SFO or the Airport) of the Notice of Availability of the Draft Environmental Impact Report (DEIR) for the Millbrae Station Area Specific Plan Update and Transit-Oriented Development (TOD)# 1 and TOD#2 projects. We appreciate this opportunity to comment on the DEIR and coordinate with the City of Millbrae (the City) in its evaluation of land use compatibility issues that the Specific Plan Update and the TOD projects may pose.</p> <p>The Specific Plan area is in an urbanized location in the City of Millbrae, encompassing the existing BART and Caltrain Millbrae station and future station infrastructure for the California High Speed Rail. The proposed projects analyzed by the DEIR include both the Specific Plan Update and associated General Plan and Zoning Ordinance amendments, and the separate proposed TOD#1 and TOD#2 projects. The build out under the Specific Plan as proposed under the Update would include offices, retail, and multi-family residential units in a mixed-use context, and a 100 to 125 room hotel.</p> <p>The proposed projects and the corresponding evaluation in the DEIR raise the following primary concerns for the Airport: (1) the height limits proposed under the Specific Plan Update and under the TOD# 1 project exceed the height limits identified in the Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (ALUCP) as necessary in order to be consistent with the ALUCP, and (2) the DEIR evaluation of land use and hazard impacts does not in all cases reflect the inconsistency with the ALUCP. This letter will address these issues as they relate to the DEIR, but also express the Airport's general concern about height limits proposed that would be inconsistent with the ALUCP and create potential safety hazards to air operations at SFO.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment introduces the commenters concerns that are described in their comments that follow and each of these comments is more precisely addressed in the responses to comments provided below. The comment is acknowledged and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.</p>
A5-2	<p>Further, to our knowledge, the Airport Land Use Commission (ALUC) has not had the opportunity to review the DEIR or to undertake a consistency review of the Specific Plan Update and the TOD projects proposed under the Specific Plan. Recognizing that the City of Millbrae should have this review before taking any discretionary action on the Specific Plan Update and the TOD#1 and TOD#2</p>	<p>As described in Chapter 1, Introduction, of the Draft EIR, in compliance with Section 21080.4 of the California Public Resources Code, the City circulated the Notice of Preparation (NOP) of an EIR for the proposed Project to the Office of Planning and Research (OPR) State Clearinghouse (SCH), as well as interested agencies and persons, on September 19, 2014 for a 30-day review period. In the interests of the</p>

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	<p>projects, the Airport requests an extension of the DEIR public review comment period, as the next ALUC committee meeting is scheduled for September 25, 2015, and the City/County Association of Governments of San Mateo County (C/CAG) Board acting as the formal ALUC would not see this until October.</p>	<p>citizens of Millbrae and all interested parties, the City extended the comment period of the NOP to November 24, 2014 for a 67-day review period. In accordance with Section 15105 of the CEQA Guidelines, the Draft EIR requires a 45-day review period. As described in Chapter 1, the Draft EIR was available for review by the public and interested parties, agencies, and organizations for a 45-day comment period starting on Wednesday, June 24, 2015 and ending on Monday, August 10, 2015. As such, CEQA requirements related to the review period for the Draft EIR were fulfilled. San Francisco International Airport (SFO) and City/County Association of Governments of San Mateo County (C/CAG) have been noticed at each phase of the CEQA noticing process.</p> <p>Additionally, as described in Chapter 3, Project Description, of the Draft EIR, as part of the planning process, a Technical Advisory Committee (TAC) was established that included representatives from SFO and C/CAG, which serves as the Airport Land Use Commission (ALUC) for San Mateo County. The TAC met three times during the planning process to identify critical issues, review technical studies and the market assessment, and review the preliminary alternative. Following a joint Planning Commission/City Council meeting and third TAC meeting, the draft alternative that is the subject of this Draft EIR was selected for inclusion in the proposed Specific Plan Update.</p> <p>As described in Response to Comment A1-1, the City is aware of the procedures described by the commenter and is currently in the process of having the Millbrae Station Area Specific Plan Update reviewed by the ALUC prior to adoption of the Specific Plan Update for a determination of consistency with the ALUCP.</p>
A5-3	<p>Height Limits</p> <p>The ALUCP provides that in order to be consistent with the ALUCP, "the maximum height of a new building must be the lower of (1) the height shown on the critical aeronautical surfaces map (ALUCP Exhibits IV-17 and IV -18), or (2) the maximum height determined not to be a 'hazard to air navigation' by the FAA in an aeronautical study prepared pursuant to the filing of Form 7460-1." (Refer to ALUCP, Policy AP-3 at p. IV -59).</p>	<p>The comment is noted. As described in Chapter 4.9, Land Use and Planning, of the Draft EIR, impacts related to height limit consistency with the Specific Plan Update for the TOD #1 project site were determined to be significant and unavoidable as they exceed the height limits of the Specific Plan Update (i.e. 136 feet proposed compared to 120 feet allowed).</p>

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	<p>The heights shown on the ALUCP critical aeronautical surfaces map are a combination of SFO Terminal Instruments Procedures (TERPS) surfaces and One-Engine Inoperative (OEI) obstacle identification surfaces. While the Federal Aviation Administration (FAA) will make a determination of whether the Specific Plan Update and the TOD projects thereunder are at heights that would pose a hazard to air navigation, if the critical aeronautical surfaces map highlighted within the ALUCP requires a lower building height, then that lower height would control for purposes of consistency with the ALUCP.</p> <p>The estimated height limits above ground level (AGL) that would be allowed throughout the Specific Plan area based on the ALUCP critical aeronautical surfaces map as shown in Figure 1, attached. While the Specific Plan Update indicates that heights must be compatible with the ALUCP, the actual height limits currently shown within the Specific Plan Update at the TOD#1 project site may not be compatible with the ALUCP. In addition, the TOD# 1 project as described in the DEIR project description includes heights up to 136 feet AGL, which, as shown in Figure 1, attached, would not be compatible with the ALUCP.</p>	
A5-4	<p><u>DEIR Analysis</u> <i>Land Use and Planning</i></p> <p>There is an inconsistency in TOD#1 project's height limits between the DEIR and the Specific Plan. The DEIR states that the TOD#1 project proposes a maximum height of up to 136 feet subject to FAA and SFO approval, while the Specific Plan has the maximum heights in a range from 108 to 120 feet. The DEIR on page 4.9-18 identifies this as a significant unavoidable land use impact (LU-TOD#1-2) since the maximum height under the TOD #1 project exceeds the height limit under the Specific Plan Update, and because no mitigation to reduce the impact is available. However, on the following page it concludes that the proposed project (Specific Plan Update) is consistent with the ALUCP because the height of future development would be required to be consistent with Urban Design Policy PD2 (this policy would require building heights to comply with FAA standards and the ALUCP); therefore combined with land use compatibility and compliance with the FAA and ALUCP height approval process, impacts would be less than significant. The DEIR should clarify how the Specific Plan Update and</p>	<p>As described in Chapter 3, Project Description, the EIR is intended to disclose and assess potential environmental impacts associated with the adoption and implementation of the proposed Specific Plan Update and associated General Plan and Zoning Ordinance Amendments, and the proposed TOD #1 and TOD #2 projects, and to determine corresponding mitigation measures, as necessary. This EIR provides a project-level review of the proposed TOD #1 and TOD #2 projects and does not evaluate the impacts of other future specific, individual developments that may be allowed under the program-level review of the proposed Specific Plan Update. Each future project outside the TOD project sites would require environmental review, as required by CEQA, to secure the necessary discretionary development permits. Therefore, while subsequent environmental review may be tiered off the program-level review in this EIR, this EIR is not intended to address impacts of future individual projects. Subsequent projects will be reviewed by the City for consistency with the proposed Specific Plan Update, General Plan, Zoning Ordinance, and this EIR, and subsequent project-level environmental review will be conducted as required by CEQA. Accordingly, if future projects propose height limits that exceed the Specific Plan</p>

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	<p>the TOD#1 project thereunder, proposing height limits exceeding the maximum height limits of the ALUCP (and the Specific Plan in the case of TOD#1), can have a less than significant land use impact as discussed on page 4.9-19 of the DEIR, when TOD#1 is identified as a significant and unavoidable land use impact because it is inconsistent with the ALUCP.</p>	<p>Update, and subsequently the ALUCP, impacts associated with those projects would be found to have a significant consistency conclusion.</p> <p>As described in Chapter 4.9, Land Use and Planning, of the Draft EIR, the Specific Plan Update is consistent with the ALUCP and impacts related to consistency are found to be less than significant. The Specific Plan Update does not allow heights for future development to exceed the height limits of the ALUCP. The Specific Plan Update is evaluated on a programmatic level and considers impacts from future development other than TOD #1 and TOD #2 that are not currently defined at the project-level and not the subject of this EIR; therefore, the impact conclusion of less-than-significant at the programmatic-level is correctly identified as future projects would be required to comply with the height limits set forth in the Specific Plan, which are consistent with the ALUCP.</p> <p>As described in Chapter 4.9 and summarized above in Response to Comment A5-4, the Specific Plan Update includes a height limit ranging from 108 to 120 feet for the TOD #1 project site – consistent with the SFO ALUCP critical aeronautical surface map. While the TOD #1 project site is a "future project" under the Specific Plan Update it is the subject of this Draft EIR, and because the TOD #1 project is proposing a height greater that will be allowed by the Specific Plan Update, this project-level impact (Impact LU-TOD#1-2) is correctly identified as a significant impact with regards to Specific Plan consistency. However, as stated in SFO ALUCP Policy AP-3, in order to be deemed consistent with the SFO ALUCP, the maximum height of a new building must be the lower of (1) the height shown on the SFO critical aeronautical surface map (see Figure 4.7-2), or (2) the maximum height determined not to be a "hazard to air navigation" by the FAA in an aeronautical study prepared pursuant to the filing of Form 7460-1. Impacts associated with hazards are discussed in Chapter 4.7, Hazards and Hazardous Materials, of the Draft EIR.</p>
A5-5	<p>Hazards and Hazardous Materials</p> <p>Within the Hazards and Hazardous Materials chapter on page 4.7-32, the DEIR states that the TOD#1 and TOD#2 projects would be required to be consistent with ALUCP Policy AP-3 and Millbrae Municipal Code Chapter 9.55, which</p>	<p>As described in Chapter 4.7, Hazards and Hazardous Materials, the Specific Plan Area is within areas of the ALUCP that limits land use and building height to minimize hazardous impacts to people residing or working in the Specific Plan Area. The impact conclusions drawn in this section are with regards to hazardous impacts and not building height limit consistency, as discussed in Chapter 4.9, Land Use and Planning</p>

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	<p>require project applicants to be subject to requirements of federal and state law that effectively prohibit the construction of any structure determined by the FAA to be a hazard to air navigation. Therefore, compliance with ALUCP Policy AP-3 and Millbrae Municipal Code Chapter 9.55 would ensure the proposed building height would not create a hazard to air navigation and impacts would be less than significant; thus, no mitigation measures are required.</p> <p>This statement, however, does not describe TOD#1 as proposed in Chapter 3, Project Description. The DEIR should state that the environmental impact of the maximum building height of 136 feet for TOD#1 as currently described is significant and unavoidable, unless the building height of the proposed TOD#1 site were lowered to be consistent with ALUCP Policy AP-3 and Millbrae Municipal Code Chapter 9.55. In fact, the DEIR finds the TOD#1 project impact to be less than significant, even though it proposes heights that would exceed those on the ALUCP critical aeronautical surface map. While it appears that the significant determination is made on the basis that TOD#1 project height limits would comply with ALUCP Policy AP-3, the project as proposed would not comply. The Draft EIR analysis and significance conclusions must be based upon the project as proposed and included in the EIR project description.</p> <p>In accordance with California Public Utilities Code Section 21676, the Specific Plan Update must be submitted to the ALUC prior to adoption for a determination of consistency with the ALUCP; however, the ALUC has not yet had this opportunity. A local agency can override an Airport Land Use Commission determination that a Specific Plan is inconsistent with an adopted Airport Land Use Compatibility Plan, but it can only do so by a two-thirds vote of the governing body and only if the governing body makes specific findings that the action is consistent with the purposes stated in Public Utilities Code Section 21670¹. At least 45 days prior to the decision to overrule the ALUC, the local agency's governing body must provide the ALUC a copy of the proposed decision and findings, to be coordinated with SFO staff to ensure that the proposal will be compatible with future as well as existing airport operations.</p> <p>Even should the ALUC find the Specific Plan Update to be consistent with the ALUCP and the City of Millbrae adopts the Update, any future approval of TOD#1</p>	<p>(see Response to Comment A5-4 above).</p> <p>As described in Chapter 3, Project Description, all development projects under the Specific Plan Update are required to be consistent with the SFO ALUCP, unless granted an exception by the FAA, SFO, and other responsible agencies. As described in Chapter 4.7, the ALUCP Policy AP-3, in order to be deemed consistent with the SFO ALUCP, the maximum height of a new building must be the lower of (1) the height shown on the SFO critical aeronautical surface map (see Figure 4.7-2), or (2) the maximum height determined not to be a "hazard to air navigation" by the FAA in an aeronautical study prepared pursuant to the filing of Form 7460-1. Therefore, the height of a proposed building may not cause a "hazardous air space condition" just because it exceeds the height limit on the SFO critical aeronautical surface map and also may not be inconsistent with the SFO ALUCP just because it exceeds the height limits on the SFO critical aeronautical surface map. The less-than-significant conclusion with respect to a "hazardous condition" was correctly identified in Chapter 4.7 based on following the procedures identified in the SFO ALUCP's Policies AP-1.1, AP-1.2, AP-2, and AP-3, which are described in the Draft EIR in Table 4.7-1, Airspace Protection Policies Applicable to the Specific Plan Area.</p> <p>Chapter 3, Project Description, and Chapter 4.7 of the Draft EIR each describe the TOD #1 project as having a proposed maximum height of 136 feet subject to the SFO ALUCP, and FAA and SFO approval.</p> <p>As described in Chapter 3, Project Description, approval of the TOD#1 project would require approvals from the FAA and C/CAG. If through compliance with SFO ALUCP Policy AP-3, the FAA determines that the 136-foot height limit is not a "hazard to air navigation," then a consistency finding for the proposed Project and the SFO ALUCP at that height could be made and no amendment to the Specific Plan Update would be required.</p> <p>See Responses to Comments A1-1 and A5-2 with regards to the ALUC's review of the Specific Plan Update.</p>

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	<p>as it currently is proposed would still require an amendment of the Specific Plan, with the amendment required to be reviewed by the ALUC. Since the TOD#1 project is inconsistent with the ALUCP due to the height limits proposed under the project, any Specific Plan amendment with these height limits would be inconsistent with the ALUCP.</p> <p>Footnote 1: "To protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses." Section 21670(a)(2)</p>	
A5-6	<p><i>Traffic</i></p> <p>SFO provided information to the City of Millbrae in a June 12, 2015 letter regarding the level of intended use of the Airport's property, adjacent to the proposed TOD#2 north of Millbrae Avenue. The 5.5 acre site, which the City refers to as Site 7, will have continued truck and other vehicle traffic as it is used for temporary construction staging and contractor parking for ongoing airport development projects. Therefore, the Airport appreciates continued coordination concerning the site as it relates to the Specific Plan and development of nearby properties.</p>	<p>The letter described by the commenter is acknowledged and was provided in Appendix A of the Draft EIR. No development on this portion of the Specific Plan Area is proposed under the proposed Project. The City will continue to coordinate with the Airport regarding Site 7. Any truck and other vehicle traffic activity occurring at the site during the traffic data collection period would have been accounted for and therefore included in the EIR traffic analysis.</p>
A5-7	<p><i>Noise</i></p> <p>In evaluating the project site, the Draft EIR should consider the effects of noise on all proposed development. While the site is located outside of the Airport's 65-70 db CNEL noise contour for noise associated with aircraft operations, it will be subject to higher noise levels when runway use and flight routes differ from typical patterns utilized in prevailing wind conditions. The site is located within the ALUCP Airport Influence Area A-Real Estate Disclosure Area, and Section 11010 of the Business and Professions Code requires people offering subdivided property for sale or lease to disclose the presence of an airport within two miles of the property through an official statement prior to move-in. Additionally, ambient noise from vehicular traffic along El Camino Real and Millbrae Avenue, and train activity along the Caltrain and BART corridors must be considered, and appropriate sound insulation is advised.</p>	<p>The comment is noted. As described in Chapter 4.10, Noise, of the Draft EIR, the noise analysis considered impacts to the two existing mixed-use residential developments in the Specific Plan Area, duplexes and single- and multiple-family residences off-site in the vicinity of the Specific Plan Area, and a number of residences and other noise-sensitive receptors along roads that would serve as access routes to the Specific Plan Area, including Millbrae Avenue, Chadbourne Avenue, and Victoria Avenue. Chapter 4.10 includes an analysis of noise from noise associated with SFO, vehicular noise, railway transportation, and construction.</p>

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A5-8	<p><i>Lower Intensity Alternatives for the TOD #1 Project and the Specific Plan Update</i> CEQA Guidelines 15126.6(b) states that, "... the discussion of alternatives shall focus on alternatives to the project ... capable of avoiding or substantially lessening any significant effects of the project..." The alternatives analysis in the DEIR does not present alternatives to the Specific Plan Update or the proposed TOD #1 project that would feasibly attain most of the basic objectives of the project but avoid or substantially lessen any of the significant effects of the project.</p> <p>While the Lower Intensity Alternative for the TOD #1 project in the DEIR reduces the overall square footage of development by 30 percent, this alternative does not adequately address the significant and unavoidable land use impact identified for the proposed project (LU-TOD# 1-2). It is unclear whether the building heights for this alternative would be consistent with ALUCP Policy AP-3 and Millbrae Municipal Code Chapter 9.55 because the Specific Plan Update proposes heights that are inconsistent with the ALUCP and this alternative does not include a specific maximum building height to compare with the proposed project. Therefore, one cannot determine with any certainty whether the Lower Intensity Alternative for TOD # 1 avoids or substantially lessens the significant and unavoidable impact of the proposed project.</p> <p>Similarly, the Lower Intensity Alternative for the Specific Plan Update does not present a project that avoids or lessens the allowable maximum building heights that are consistent with the ALUCP. Although the DEIR concludes that the land uses under this Lower Intensity Alternative are consistent with the ALUCP, this alternative does not include a specific maximum building height to compare with the proposed project. Since the maximum building height standards under the Specific Plan Update are not, as discussed above, consistent with the ALUCP, then this Lower Intensity Alternative should address that impact and identify a maximum building height that would be consistent with the ALUCP.</p>	<p>The commenter expresses an opinion regarding the alternatives analyzed in the Draft EIR and incorrectly asserts that the Draft EIR does not present alternatives that feasibly attain most of the basic objectives of the Project but avoid or substantially lessen any of the significant effects of the Project. Under CEQA, as described in Chapter 5, Alternatives of the Proposed Project, of the Draft EIR, there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. The lead agency is responsible for selecting a range of Project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. As described in Chapter 5, the alternatives were developed to provide a range of development scenarios reflecting differences in the intensity of office and retail development and residential density within the Specific Plan Area; thereby, potentially reducing identified significant impacts of the proposed Project. The first alternative is the CEQA-required No Project Alternative, which assumes the proposed Specific Plan Update, TOD #1 project and TOD #2 project would not be adopted, and the Specific Plan Area would be developed consistent with the 1998 Millbrae Station Area Specific Plan as amended by the City Council in 2002 (1998 Specific Plan). The second alternative, Lower Intensity Alternative, presents a lower intensity growth scenario when compared to the proposed Project, but within the same general land use patterns. These alternatives are described in detail in Chapters 5.1 through 5.3. Accordingly, the Draft EIR has been prepared consistent with these CEQA requirements.</p> <p>The comment incorrectly states that the Specific Plan Update proposes height limits that are inconsistent with the SFO ALUCP. Figure 3-10 illustrates height limits in the Specific Plan Area and these height limits are consistent with the SFO ALUCP.</p> <p>The commenter also incorrectly states that the Draft EIR does not provide sufficient detail on the proposed height limits of the Lower Intensity Alternative to adequately evaluate consistency with the SFO ALUCP. As described in Chapter 5.1, Alternatives to the Specific Plan Update, Chapter 5.2, Alternatives to the TOD #1 Project, and Chapter 5.3, Alternatives to the TOD #2 Project, of the Draft EIR, under the Lower Intensity Alternatives, the overall development assumed for the Specific Plan Update, TOD #1 project, and TOD #2 project would be substantially reduced by 30 percent from what is assumed in the proposed Specific Plan Update. Although no specific maximum height has been determined for the overall Specific Plan Update and TOD #2 project</p>

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		<p>Alternatives, it is assumed that the maximum height permitted under these Alternatives would be less than the Specific Plan Update because the reduced development potential would not require as much height. Since the Specific Plan Update does not exceed building heights of the SFO ALUCP, it is assumed the reduced building heights also would not exceed the heights of the SFO ALUCP. Therefore, like the Specific Plan Update, the land uses under these alternatives would be consistent with the SFO ALCUP. Under the Lower Intensity Alternative for the TOD #1 project the proposed development at a 30 percent reduction could be accommodated within a 108- to 120-foot height range, which is the maximum height range identified in the Specific Plan Update, and therefore would be consistent with the SFO ALUCP.</p>
A5-9	<p>The Airport appreciates your consideration of these comments. If I can be of assistance as the City considers airport land use compatibility as they relate to this project or future projects, please do not hesitate to contact me at (650) 821-7867 or at john.bergener@flysfso.com.</p>	<p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
Attachment A5-1	<p>Comparison of Existing Ground Elevation and Critical Air Surface map</p>	<p>The City has examined the attachment and concluded that it does not warrant any revisions to the EIR. The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.</p>
A6	Traci Choi, Community Builder, Housing Leadership Council of San Mateo County, August 6, 2015	
A6-1	<p>Thank you for the opportunity to provide comments in response to the MSASP Draft EIR. As you know, the Housing Leadership Council of San Mateo County (HLC) works to promote policies and plans that enable equitable growth in our communities and a viable quality of life. We see the MSASP and EIR as an important opportunity to not only promote new growth and development in Millbrae, but also to protect and improve critical aspects of a healthy community, such as benefits for existing resident and small businesses, creating local jobs, safe and walkable streets, and accessible transportation options.</p> <p>Please consider the following comments in response to the Draft EIR, released on June 30, 2015.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment introduces the commenter's concerns that are described in their comments that follow and each of these comments is more precisely addressed in the responses to comments provided below. The comment is acknowledged and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.</p>

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A6-2	<p><u>Section 4.11</u> In Section 4.11.3, the draft EIR finds that the buildout of the proposed Specific Plan Update could result in as many as 7,600 additional jobs. While the EIR provides a brief description about a jobs-to-housing mismatch, the EIR has not done an analysis of the likely wages of these new jobs or the affordability of new housing stock to accommodate these workers. Without an analysis of a jobs-to-housing match (also known as jobs-housing fit), it is impossible to determine whether the new workers will be able to afford to live in the housing units proposed under the Specific Plan Update. To address this issues, the plan should require all projects to conduct an assessment of the wage rates for all occupations so that ongoing analysis of the job-to-housing match can be monitored and evaluated over the life of the Plan.</p>	<p>As described in Chapter 4.11, Population and Housing, of the Draft EIR, approximately 90 percent of jobs would be related to office and research and development (R&D), and employment opportunities would be also in line with the income needs of the employed workers within Millbrae where housing costs are high." However, since the proposed Specific Plan being updated would only designate land use types and not put actual uses in place, the exact businesses that will be housed in the Specific Plan Area are unknown and therefore an analysis of the wages for future jobs would be speculative. Moreover, the provisions of CEQA do not require such analysis. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters</p>
A6-3	<p>The Draft EIR also finds that development of the Specific Plan Update and TOD #1 and #2 will have "less than significant" or "no impact" related to the displacement of people. However, this analysis does not consider displacement as a result of rising home prices or rents due to new development. Any displacement of existing residents would have environmental impacts and significant social and economic effects. A recent report by University of California Berkeley's Center for Community Innovation highlights the project area as "at risk of gentrification or displacement."</p>	<p>The displacement of individuals as a result of rising housing costs cannot be attributed to the proposed Project since it would be speculative to conclude whether or not a similar increase in housing costs would occur without implementation of the Project. See Response to Comment A2-6 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
A6-4	<p>CEQA requires analysis of direct and indirect impacts, including impacts resulting from social and economic consequences of this project. The DEIR must therefore evaluate the physical, environmental, and health consequences associated with economic displacement. For example, among other steps, the DEIR should model displacement and identify likely trends in displacement, including areas likely to face pressure, number of households affected, the communities expected to absorb these households, and the local and quantity of resulting demand for additional housing needs. Similarly, the Specific Plan Update is likely to cause displacement of residents through increased rents and evictions, which clearly have adverse effects, including on human health, that makes displacement a significant impact.</p>	<p>The displacement of individuals as a result of rising housing costs cannot be attributed to the proposed Project since it would be speculative to conclude whether or not a similar increase in housing costs would occur without implementation of the Project. See Response to Comment A2-6 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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A6-5	As you may also know, Millbrae is expected to receive a report regarding the feasibility of a development impact fee study, which will, among other things, justify and recommend an impact fee on all new residential and commercial development. We strongly urge the City to consider the adoption of a commercial and housing impact as quick as possible, either before the MSASP is approved or before the approval of individual development projects. Impact fees will be a critical source of funding for future affordable housing development to mitigate the creation of new service-level jobs as result of this and other new development.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters
A6-6	Also, as a result of the passage of SB 743 in 2013 the state legislature directed the California Office of Planning and Research to create guidelines that move traffic analysis from the previous Level of Service (LOS) standard to the more environmentally sensitive Vehicles Miles Traveled (VMT). The guidelines have not been fully adopted yet, but please consider conducting a parallel analysis using the new VMT standard to highlight the inherent benefits of transit-oriented development.	As the commenter states, and as described in detail in Chapter 4.13, Transportation and Circulation, of the Draft EIR, the revised CEQA Guidelines aimed at new criteria promoting the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses have not been adopted. This means that the alternative metrics for VMT calculation methodology and regional thresholds under SB 743 have not yet been determined. Until thresholds are adopted, VMT-based transportation environmental impacts cannot be determined. Therefore, an analysis based on SB 743 would be premature for this EIR. It should be noted that VMT estimates were prepared for this Project and provided for the Greenhouse Gas (GHG) Emissions assessment described in Chapter 4.6, Greenhouse Gas Emissions, of this Draft EIR.
A6-7	I appreciate your consideration of these comments and look forward to continued discussions with staff and City Council through the MSASP update process.	The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
A7	Guy Preston, PE, Project Manager, California High-Speed Rail Authority, Northern Region	
A7-1	Please see the attached letter from the California High Speed Rail Authority regarding the Draft Environmental Impact for the Millbrae Station Area Specific Plan Update and Transit-Oriented Development (TOD) #1 and #2 Projects.	The comment introduces the attachments to the comment letter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The City has examined the attachment and concluded that it does not warrant any revisions to the EIR. No further response is required.
A7-2	This letter presents our response to the Draft Environmental Impact Report (EIR) for the Millbrae Station Area Specific Plan (MSASP) Update and Transit-Oriented Development (TOD) #1 and #2 Projects for your consideration.	The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment

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	<p>The California High-Speed Rail Authority (Authority) requests that the MSASP plan for a future High-Speed Rail (HSR) station in concert with the Phase I blended Caltrain/HSR system. Millbrae is one of three Bay Area HSR station cities included in the Phase I blended Caltrain/HSR system, along with the Transbay Terminal in San Francisco and Diridon Station in San Jose. The Phase I blended Caltrain/HSR system is an integrated rail system supporting future Caltrain and HSR operations serving the communities along the peninsula rail corridor.¹</p>	<p>introduces the commenter’s concerns that are described in their comments that follow and each of these comments is more precisely addressed in the responses to comments provided below. The comment is acknowledged and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.</p>
	<p>The urban design for a future HSR station environment requires a holistic approach to integrate HSR facilities into an existing multimodal station environment. The goal of the Authority is to work in partnership with cities and stakeholders to collaborate on station design and station area planning. A holistic approach balances community and transportation system needs, considers trade-offs among multiple stakeholder groups, and aims for excellence in project design.</p>	<p>As described in Chapter 3, Project Description of the Draft EIR, the California High Speed Rail Authority (CAHSRA) is currently undergoing a separate planning process for the High Speed Rail (HSR) and that while the Specific Plan Update has been drafted to consider HSR, the HSR project, which is in a conceptual phase of the HSR planning process, is not evaluated in this Draft EIR. As discussed in Chapter 3, a draft report showing analysis of various options of track alignments for shaping the San Francisco to San Jose segment was released on April 2010. The HSR planning process has continued to progress since this time and the Request for Qualifications for Environmental and Engineering Services on the San Francisco to San Jose and San Jose to Merced Project sections was released on August 2015. The City recognizes the importance of the Millbrae Station Area’s role in the HSR planning process and has included the CAHSRA in each phase of the Specific Plan Update Process. As described in Chapter 3, the planning process for the proposed Specific Plan Update began in early 2014 with the preparation of technical studies and a market assessment. A Technical Advisory Committee (TAC) was established at this time that included representatives from the CAHSRA. The TAC met three times during the planning process between March 2014 and August 2014 to identify critical issues, review technical studies and the market assessment, and review the preliminary alternative for the preferred Specific Plan Update. Following a joint Planning Commission/City Council meeting in July 2014 and third TAC meeting in August 2014, the draft alternative that is the subject of this Draft EIR was selected for inclusion in the proposed Specific Plan Update. The City also met with the CAHSRA in September 2014 to discuss required right-of-way for future HSR operation and assumptions for potential mode share and parking. As discussed in Chapter 1, Introduction, of the Draft EIR, the Notice of Preparation of the Draft EIR was released in September 19, 2014 for a 30-day review period. In the interests of the citizens of Millbrae and all interested parties, the City extended the comment period of the NOP to November 24, 2014 for a 67-day review period. During this time the City received one comment letter from the CAHSRA on November 21, 2014, which is</p>
	<p>Footnote 1: The 2012 High-Speed Rail early investment agreement with 9 agencies established a blended system along the Peninsula Corridor. The California High-Speed Rail Authority and the Federal Railroad Administration are investing \$600 million of Proposition 1A funds and \$106 million of Proposition 1A "connectivity" funds to enable early investment in the Caltrain Electrification infrastructure and Advanced Signal System projects. BART is receiving \$34 million of Prop 1A funds for fleet replacement to enhance connectivity to high-</p>	

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	<p>speed rail at Millbrae Station and other connecting stations.</p> <p>Millbrae was identified as a preferred HSR station as early as January 2009 in the NOP for the San Francisco to San Jose corridor high-speed rail EIR/EIS.</p>	<p>included in Appendix A of the Draft EIR. The City met with CAHSRA on February 24, 2015 to discuss HSR ridership and revenue forecasting. Note, by the time this information was released, the technical analysis for the EIR was well underway; however, the cumulative analysis described in Chapter 4.13, Transportation and Traffic, of the Draft EIR incorporates transit ridership projections that include the Caltrain Electrification and Modernization Project currently scheduled for completion in 2021. Additionally, a separate planning process is currently underway for a Station Access Improvement Plan, which is a comprehensive analysis of the access challenges and improvement opportunities for the Millbrae Station TOD site located on the development parcel to the east of the Station.</p> <p>The City will continue its ongoing efforts to plan and coordinate with the CAHSRA and actively engage in the HSR planning process.</p>
A7-3	<p><u>Project Description</u></p> <p>1. Visions and Goals. The MSASP's vision statement needs to expand the project goals to capture the unique benefits of this regional asset by including a HSR station at Millbrae that is envisioned by the Phase 1 Blended Caltrain/HSR system. The HSR vision is greater than a regional/local transit hub and community destination and realizes:</p> <p>a. New Inter-city Travel Choice. A Millbrae HSR station will provide new inter-city and inter-regional access throughout California. The Millbrae HSR station will have a regional catchment area, serving the population and businesses of the San Francisco Peninsula. HSR travel choices will increase with the expansion of the system over time.</p> <p>b. Economic Opportunity. HSR services will significantly increase Millbrae station's accessibility, visibility, identity, economic opportunities, and real estate values, and stimulate travel demand to and from the station. This significant increase in ridership is an opportunity for the City to attract employment and business investment.</p> <p>c. Efficient Station Access. The vision prioritizes efficient regional access to minimize travel time and local access to support transit-oriented development.</p> <p>d. Point of Arrival to Explore California. The Millbrae station is the transfer point</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters</p>

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	<p>for international and domestic travelers to HSR service via the San Francisco International Airport. The station area will be an attractive investment to serve this unique business and tourism market. The Millbrae station can become a traveler destination and support hotel, employment, shopping, entertainment and other high profile uses.</p>	
	<p>e. Clean Mobility. HSR is a new, energy efficient, environmentally beneficial travel option that supports sustainable economic and population growth.</p>	
	<p>2. Development Setbacks. The MSASP should consider development setbacks that preserve future space for a new HSR station and adequate capacity for station access. The proposed development projects on both sides of the station are sited very close to the rail corridor. The proposed site plans will constrain building a new HSR station in an already physically restricted environment.</p>	
	<p>a. Area 1 Northwest Quadrant TOD #1. To provide space for station access to the station, the Authority recommends maintaining the <i>1998 MSASP Policy CIRC-2.1 Extend California Drive from Linden Lane north to El Camino Real at Victoria Avenue</i>. The 1998 MSASP required new development to be set back 129 feet from the Caltrain platform. An exact setback can be determined through a HSR station access study.</p>	
	<p>b. Area 3 Northeast Quadrant TOD #2. The MSASP should be revised to provide adequate space, visibility and access for an entrance to a HSR station. Area 3 locates a 7-story office building and mixed-use development very close to the intermodal station. There needs to be balance between TOD pedestrian access and station vehicular access. While close proximity of buildings supports walking to the station, it does not support including an HSR connection at the station. View to the station is completely blocked from Rollins Road. Drivers who want to drop-off passengers have no return loop to stay in the station area if they miss picking up a passenger. They have to leave the station area and take a circuitous, time consuming route to return to the station.</p>	
	<p>3. Multimodal Access. The MSASP should consider HSR station access routes and evaluate both sides of the station for adequate capacity and traffic</p>	

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	<p>operations. On the west side this includes the extension of California Avenue. On the east side this includes the shuttle stop and "kiss and ride" areas, the new roadway configuration, conversion of South Station Road to two-way traffic, and an alternative route for South Station Road.</p>	
	<p>HSR service is highly sensitive to door-to-door travel time. Station access needs to be a priority for circulation planning. This complex topic requires a collaborative process. The Authority supports the plan's transportation demand management and multi-modal infrastructure strategies to reduce vehicle traffic congestion by shifting travel behavior from single occupant vehicles to higher capacity vehicles.</p>	
	<p>HSR station access routes need evaluation on both sides of the station for adequate capacity and traffic operations. On the west side this includes the extension of California Avenue. On the east side this includes the shuttle stop and "kiss and ride" areas, the new roadway configuration, conversion of South Station Road to two-way traffic, and an alternative route for South Station Road.</p>	
	<p>4. Public Space. Area 1 has a very narrow public space with poor visibility from El Camino Real and the station. Area 1 does not show the 1998 MSASP extension of the station concourse to a public gathering space facing El Camino Real. A new concourse for a HSR station would be larger and extend farther than envisioned in the 1998 MSASP. The new concourse would include a new station entrance, stairs, escalators and elevator access up to connect passengers to high-speed rail, Caltrain and BART trains.</p>	
	<p>The MSASP for Area 3 proposes a small public space and a long, narrow roadway for the arrival of passengers. This city/station interface area needs evaluation to determine if there is adequate space for the interchange of passengers with shuttles and drop-off. How these two environments can complement the surrounding uses needs a more detailed evaluation regarding the travelers arrival and departure sequence to create a vibrant destination as part of the station entrance.</p>	

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	<p>5. Parking. The 2040 HSR travel demand forecast should be incorporated into the MSASP's parking projections. The 2040 HSR travel forecast is a starting point to anticipate future blended system parking demand and supply strategies and its absence from the MSASP may underestimate parking demand at the station. The Authority encourages use of shared parking, market rate parking pricing and use of remote parking facilities. Remote parking will require shuttle drop-off and pick-up areas on both sides of the station. HSR parking strategies will require detailed study and collaboration with stakeholders.</p> <p>HSR station access routes need evaluation on both sides of the station for adequate capacity and traffic operations. On the west side this includes the extension of California Avenue. On the east side this includes the shuttle stop and "kiss and ride" areas, the new roadway configuration, conversion of South Station Road to two-way traffic, and an alternative route for South Station Road.</p>	
	<p>6. Value Capture. The Authority supports value capture strategies for the increase in land value for properties resulting from access to the HSR system. The Authority supports the City in considering the range of funding sources and financing mechanisms in the MSASP to pay for the cost of public improvements and infrastructure in the plan area.</p>	
A7-4	<p><u>Environmental Analysis</u></p> <p>1. HSR Operations. The Draft EIR does not include HSR as part of future operations at the Millbrae Station which may substantially underestimate the transit and rail ridership demand at the station.</p>	See Response to Comment A7-2.
A7-5	<p>a. The Draft EIR on Page 1-1 notes that that the "Draft EIR compares the buildout potential¹ of the Specific Plan Area and the development of the proposed TOD #1 and TOD #2 projects with the existing baseline condition... "</p> <p>Footnote 1 defines buildout potential as "the maximum theoretical amount of development that could occur within the 25-year horizon of the Specific Plan Update" yet the Draft EIR does not account for HSR operations at the station and accompanying ridership. HSR and improved Caltrain service may create more development capacity in the study area than considered in the Draft EIR.</p>	See Response to Comment A7-2.

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A7-6	<p>b. The Draft EIR on page 3-3 notes that the Specific Plan Update has been drafted to consider the HSR project and references the HSR 2014 Business Plan, however, information related to HSR operation is not included in the Draft EIR. While detailed plans for the Millbrae Station have not yet been developed, it can be anticipated that operation of HSR through the Millbrae Station will spatially alter the station configuration and introduce new ridership at the station. Projected HSR ridership numbers at the Millbrae and San Francisco stations were provided to the City of Millbrae on February 24, 2015 for use in developing the Specific Plan Update. Because the Draft EIR 2040 ridership and parking projections do not incorporate these data, transit ridership and parking needs at the station may be substantially underestimated.</p>	See Response to Comment A7-2.
A7-7	<p>c. As shown in Table 4.13-28 the Draft EIR cumulative analysis limits the discussion of projected 2040 rail ridership to BART and Caltrain projections. Future parking, bus and shuttle demand is based on the ridership projections for these two rail entities. Given that HSR is projected to be operational along the corridor by 2040, HSR should be considered as part of the cumulative impact analysis. Omission of the HSR ridership projections may severely understate future demand for parking and transit services.</p>	See Response to Comment A7-2.
A7-8	<p>d. The analysis for the TOD #1 Cumulative (2040) Transit Operations Conditions on page 4.13-100 notes "due to the increased attractiveness of rail in 2040 due to transit system improvements, a travel mode shift towards a higher share of rail trips is forecasted." The analysis excludes future HSR service and considers only BART, Caltrain, and local buses. If, in fact, rail transportation is more attractive in the future, the ridership impacts of HSR availability at Millbrae may be significant. Increased transit ridership will affect pedestrian circulation and parking demand, as well.</p>	See Response to Comment A7-2.
A7-9	<p>e. The analysis for the TOD #2 Cumulative (2040) Transit Operations Conditions on page 4.13-133 notes "Caltrain capacity utilization ... is expected to be operating at near capacity." This suggests incorporating HSR service into the transit analysis could have significant impacts on Caltrain ridership and the cumulative impacts could include pedestrian circulation and parking demand at Millbrae Station.</p>	See Response to Comment A7-2.

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A7-10	2. Transit Circulation and Demand. The Draft EIR land use and circulation plan does not support seamless transit connections or increased transit demand from HSR travelers.	See Response to Comment A7-2.
A7-11	a. The land use concept on page 3-16 promotes transit-oriented development, but it does not consider the needs of HSR travelers. While the document discusses BART and Caltrain service it does not identify future HSR service. The travel market for local/regional transit differs from the statewide HSR travel market and the needs of stateside travelers differ from those of local/regional travelers. The specific needs of HSR travelers should contribute to the development and design of transit-oriented retail, services and facilities at the Millbrae Station.	See Response to Comment A7-2.
A7-12	b. The transit circulation concepts illustrated in Figure 3-15 suggest travelers changing between rail and rubber-tire modes will have to walk longer distances to make their connections. Today SamTrans and other bus lines stop at the curb just feet away from the rail platforms. Figure 3-15 shows all bus stops moved up to 500 feet to the east, increasing the distance between trains and buses, and the time needed to transfer among modes.	The commenter's concern is identified as an impact in TRANS-TOD#2-20 and with implementation of Mitigation Measure TRANS-TOD#2-20, impacts were found to be less than significant. Additionally, the City is in the process of considering other access improvements and a Draft Millbrae Station Access Improvement Plan was submitted to the City on August 26, 2015. Also, see Response to Comment A7-2.
A7-13	c. While Specific Plan Policy P-CP 12 identified on page 4.13-39 encourages bus and shuttle transfer facilities near station entrances to support bus and shuttle priority access to BART, Caltrain, and future rail service, such as HSR, the cumulative analysis does not incorporate HSR ridership projections when projecting future bus and shuttle demand. The absence of HSR ridership projections may substantially underestimate future demand for bus and shuttle services at the station.	See Response to Comment A7-2.
A7-14	d. The increase in bicycle parking demand does not recognize the regional service needs that will be provided at the station. As shown on Table 4.13-2, the Specific Plan assumes a 10% increase in bicycle parking demand at the Millbrae Station over the next 25 years. This seems low given that the station will be a regional transit hub serving the San Francisco to San Jose corridor and San Francisco International Airport.	As described in Chapter 3, Project Description, of the Draft EIR, all developments in the Specific Plan Area would be required to provide sufficient bicycle parking. As shown in Table 3-6, Bike Parking Standards, the Association of Pedestrian and Bicycle Professionals, Bicycle Parking Guidelines, 2nd Edition, 2010; Bay Area Rapid Transit Bicycle Access and Parking Plan, 2002, were applied to the bicycle parking requirements in the Specific Plan Update. In addition, BART would meet its policy to provide plentiful secure and convenient bike parking. Bicycle parking at the Station could easily be added if needed, based on demand.

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A7-15	e. The reduction in bus bays does not support increased transit demand at the station. The proposed plan for eastside access described on page 4.13-71 would reduce the number of bus bays on the east side of the station from 11 to 7 bays. This reduction seems to be based on observed conditions and may hamper future efforts to expand transit services/ridership at the station.	Many of the existing eastside bus bays are not used. The future number of bus bays was based on current usage and the estimated increase in shuttle ridership between existing conditions and cumulative conditions with buildout of the land uses in the Specific Plan and other planned development in the area. Future demand was determined in concert with Caltrain and SamTrans staff. Recommendations to increase eastside shuttle bus bays are included in the Draft Millbrae Station Access Improvement Plan submitted to the City on August 26, 2015. See Response to Comment A7-2.
A7-16	3. Station Planning and Access Analysis. A comprehensive station planning and access analysis should be performed prior to implanting the TOD projects to capture the regional significance of the station and create an integrated seamless transit network serving regional and local travelers.	<p>The Specific Plan and EIR address station access for all transportation modes. As shown in Chapter 3 of this Final EIR, Policy CP 31, which requires development projects to participate in funding and implementing a comprehensive, multi-agency, multi-modal access plan to the Millbrae Transit Station. In the event the access plan is not complete at the time of application for projects within the TOD zone, applicants shall submit a plan of how multi-modal access and circulation to the transit station will be accomplished prior to City entitlement approval. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p> <p>The Draft Millbrae Station Access Improvement Plan submitted to the City on August 26, 2015 addresses station access on the eastside of the Station in more detail, as the TOD plans for that area have been prepared at a greater level of detail. Planning for HSR station access needs would more accurately be evaluated as part of the HSR planning and design process.</p>
A7-17	a. The Authority supports Policy Number C2.5: Coordinate with Major Transportation Agencies, which underscores the need for the City of Millbrae to continuously coordinate with the Authority, among others, to provide funding for appropriate planning, improvements and to mitigate impacts.	As described in Response to Comment A7-2, the City will continue to coordinate with the CAHSRA throughout the planning process for the HSR.
A7-18	<p><u>Conclusions</u></p> <p>The Authority urges the City to include HSR in the Millbrae Station Area Specific Plan so as to recognize the regional significance of the station and the associated transit needs. A comprehensive station plan and access analysis should be completed prior to project implementation. The HSR is part of the Phase I blended Caltrain/HSR system service plan on the corridor and future ridership projections with HSR will affect operations at the station. The absence of this</p>	The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.

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	<p>information in the Draft EIR may severely underestimate the 2040 transit and parking demands. We request revision of the Draft EIR 2040 analyses to incorporate HSR ridership projections.</p> <p>We are committed to working closely with the City and as the project continues to advance, we look forward to an open and frequent dialogue with the City and the community. In doing so, we hope to construct a High Speed Rail system that benefits all Americans and can serve as a model for future projects.</p> <p>Please feel free to contact me if you have any questions or concerns.</p>	
A8	Ellen M. Smith, Manager, Strategic and Policy Planning, Bay Area Rapid Transit District	
A8-1	<p>We at the San Francisco Bay Area Rapid Transit District (BART) appreciate the opportunity to comment on the Draft Environmental Impact Report for the Millbrae Station Area Specific Plan Update and Transit-oriented Development #1 and #2 (the DEIR). As the primary provider of transit service at the Millbrae Station, and as the owner of the land proposed for development as TOD #2, we have a strong interest in seeing the Specific Plan area develop with rich and coordinated transit service, with multimodal access, and with a vibrant transit-oriented development on our property and around the BART Station. The vision of the Specific Plan area as a center of historic Millbrae, offering jobs, housing, shops, restaurants and community spaces, is closely tied to BART's interest for this important intermodal station.</p> <p>After review of the draft environmental document, we have the following comments.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
A8-2	<p><u>Transportation and Circulation</u> COMMENT1: Implementation of the Specific Plan, including TOD #1 and TOD #2, will result in some impacts deemed "significant and unavoidable." However, as provided by CEQA Guidelines Section 15093, the City should find that those impacts are acceptable in order to achieve the project objectives and the environmental benefits of the Specific Plan improvements.</p>	<p>The comment is noted. When a lead agency approves a project that would result in significant and unavoidable impacts that are disclosed in the EIR, the agency must state in writing its reasons for supporting the approved action, including the views held by members of the public. This "statement of overriding considerations" must be supported by substantial information in the record, including the EIR. The City may approve the Project even though the Project would cause a significant effect on the environment if the City makes a fully informed and publicly disclosed decision that shows there is no</p>

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A8-3	<p>Moreover, if some of the mitigation measures proposed as a result of the expected impacts were implemented, they would have negative impacts of their own. Specifically, Mitigation Measure TRANS-SP-1.1 works against a successful TOD at the BART station site by adding additional vehicular capacity to a nearby intersection and worsening pedestrian safety at an already-difficult intersection. MM TRANS-SP-1.1 provides:</p> <p>The City shall modify the El Camino Real/Millbrae Avenue intersection footprint. The modified intersection footprint would add one (1) northbound right turn pocket lane (for a total of two (2) turn lanes) and one (1) westbound right turn pocket lane (for a total of two (2) turn lanes), each approximately 200 feet long. The City can accommodate these modifications to the intersection #4 within the current footprint through restriping. This can be accomplished by converting one westbound through lane to a right turn only lane and by restriping the northbound approach to make a left turn lane 10 feet wide, the through lanes 12 feet wide, and two (2) right turn lanes 11 feet wide.</p> <p>This mitigation measure is provided first to address Impact TRANS-SP-1.1, but is also incorporated into the mitigation measures for several other Impacts including TRANS-SP-1.3, TRANS-SP-4a, TRANS-TOD#2-15.1, TRANS-TOD#2.15.2 and TRANS-TOD#2-15.3.</p> <p>The DEIR concludes that MM TRANS-SP-1.1 is both legally infeasible and uncertain to succeed in reducing the impact to insignificance; therefore, each of the impacts it would address is determined to be significant and unavoidable. However, the Final EIR should recognize an additional basis for finding these impacts significant and unavoidable, due to adverse secondary environmental impacts that would result if MMTRANS-SP-1.1 were implemented. Adding capacity to this intersection would reduce pedestrian safety significantly. Sidewalks have been narrowed already at El Camino Real and Millbrae Avenue</p>	<p>feasible way to lessen or avoid the significant effect and specifically identifies how the expected benefits from the Project outweigh reducing or avoiding the significant environmental impacts of the Project.</p> <p>The EIR is a disclosure document. It is required to identify significant impacts and all feasible mitigation measures per the adopted significance criteria. Mitigation Measure TRANS-SP-1.1 is in regard to a vehicular intersection level of service impact per the City of Millbrae's adopted LOS criteria. Therefore, the mitigation measure meets the intended purpose of the EIR to disclose the impact and a possible means of reducing the impact through mitigation. As discussed in Chapter 2, Executive Summary, the City must adopt a Statement of Overriding Considerations if the proposed Project would result in significant impacts that cannot be avoided. A Statement of Overriding Considerations may also be made if the City finds it in conflict with other City policies.</p> <p>As discussed in Chapter 4.13, Transportation and Circulation of the Draft EIR, Mitigation Measure TRANS-SP-1.1 may not be feasible due to the City's lack of authority to independently implement (the intersection is under Caltrans jurisdiction).</p> <p>As shown in Chapter 3, Revisions to the Final EIR, Mitigation Measure TRANS-SP-1.1, has been revised to be a mitigating policy in the Specific Plan and is now identified as Policy CP 26 in the Specific Plan. Like Mitigation Measure TRANS-SP-1.1, Policy CP 26 requires the City to implement modifications that would reduce a vehicular intersection level of service impact per the City of Millbrae's adopted LOS criteria and requires the City to work with Caltrans to modify the existing El Camino Real/Millbrae Avenue intersection footprint through restriping. This revision does not affect any conclusions or significance determinations provided in the Draft EIR. The potential for adverse impacts to other modes of transportation, such as pedestrians and bicyclists, would be considered prior to implementing any modifications to this intersection as a result of restriping.</p> <p>See Response to Comment A8-2.</p>

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	<p>to allow for more vehicular throughput, and adding a right turn lane would make an unsafe and hostile pedestrian environment that much more threatening. As such, MM TRANS-SP-1.1 is inconsistent with the Project Objective to "[i]dentify recommendations for circulation and physical improvements ...all of which prioritize pedestrian mobility, bicycle access, and transit access" (DEIR, page 3-40). Moreover, this mitigation measure, is, in fact, contradictory to the DEIR Project Description. The Project Description anticipates applying "urban design principles [that] include the following: ... facilitate connections, create public open spaces, activate streets and open spaces ... " (page 3-18). These are not compatible with an expanded El Camino Real/Millbrae Avenue intersection in the Specific Plan area. Also in the Project Description, "the proposed Specific Plan Update prioritizes pedestrian circulation along all streets, with new connections through development projects and enhancements at major intersections ... The Specific Plan Update includes pedestrian intersection enhancements at ... El Camino Real and Millbrae Avenue," (page 3-31).</p> <p>We urge the city to follow the direction of the proposed Specific Plan Update, prioritize the safety of non-vehicular circulation at this important intersection, and create a safe, accessible connection between the station-area TOD and the rest of Millbrae. For these reasons, the City should find, as provided by CEQA, that overriding considerations justify proceeding with the proposed project, despite the infeasibility of MM TRANS-SP-1.1 and the resulting significant and unavoidable impacts.</p>	
A8-4	<p>COMMENT 2</p> <p>BART concurs with the circulation and parking policies included in the Specific Plan Update and outlined on page 4.13-38 of the DEIR, with one significant exception and related revision. For the most part, P-CP 1 through P-CP 25 support our Board-adopted Access Management and Improvement Policy Framework and TOD Policy and advance our mutual goals. However, BART is strongly opposed to P-CP 16, "Expand the South Station Road as a two-way public street connecting from the station entrance to Adrian Road."</p> <p>P-CP 16 would require significant demolition and reconstruction of the BART</p>	<p>P-CP 16 allows for the widening of South Station Road from the parking structure driveway, south past the residential portion of the TOD #2 project site, to Adrian Road. The widening would allow for two-way operation for a portion of the roadway and would only occur when the adjacent parcels south of Millbrae Avenue are redeveloped. Creating a two-way segment would increase vehicular access to the residential portion of TOD #2 and bicycle access to the Station as a whole. It would not require relocation of the escalator entrance or Station columns.</p> <p>The description of South Station Road on page 7-26 of the Specific Plan has been revised to better clarify that the scale of the proposed road would not require the</p>

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	<p>station, degrade passenger safety, and eviscerate the planned TOD. Although the description of the location and scale of the proposed road is inconsistent between the DEIR document and the Draft Specific Plan (see below), the Draft Specific Plan describes future South Station Road as 64 feet wide, and extending from approximately the southwest corner of the BART parking garage to the current intersection of Garden Lane and South Station Road, and then southward to Adrian Road (page 7-26). This would necessitate relocation of the escalator entrance to the station and relocation of columns supporting the station structure. The station entrance is ideally located where it is to serve current riders and future TOD users, and will not be relocated to accommodate a wider road. Any relocation will have adverse and potentially significant impacts on the circulation of transit riders and non-motorized travel, which impacts must be and are not assessed.</p>	<p>relocation of the escalator entrance.</p> <p>In the near term, South Station Road will remain a one way road for vehicles heading southbound. However, to provide direct access to the Station from Adrian Road, bike lanes north and south on South Station Road should be implemented within existing street right-of-way.</p> <p>In the future, as development occurs, South Station Road shall be improved as a new 2-way street that links Adrian Road to the Station. As shown in figures throughout this Plan, the recommended alignment for this improved street is next to the railroad right-of-way leading from Adrian Road to connect to the Station.</p>
A8-5	<p>Secondly, adding a roadway immediately in front of the station entrance would have a significant adverse impact on passenger safety that is not addressed in the DEIR: pedestrian flow would be interrupted for the benefit of cars. With BART ridership at this station having increased almost 50 percent over the last five years, changes which further degrade transit passenger flow and safety will have a significant adverse impact and must be appropriately mitigated. We cannot insert a barrier and create a new safety concern into the increasing flow of passengers through this space. If Policy P-CP 16 is retained, the DEIR should be revised and recirculated to address, and propose new mitigation for, a new or substantially more severe significant impact from implementing the policy; see CEQA Guidelines Section 15088.5.</p>	<p>The comment is referring to a potential connection between Multimodal Access Road and South Station Road to improve shuttle bus and kiss-and-ride circulation on the east side of the Station. Kiss-and-ride operations may be relocated inside of the parking garage. Therefore only shuttle buses would use the connection and the volume of traffic on this connection would be low (50 shuttles during peak hours, fewer at other times of the day). As with any roadway improvement, the alignment of the connection would be dependent on engineering feasibility studies that would illustrate how the design of the connection would minimize pedestrian/vehicle conflicts and would contain features, such as speed tables and textured pavement, to allow pedestrians to cross at grade and to calm vehicle traffic. If the selected alignment of the connection crossed in front of the escalators, then station modifications to allow the pedestrian crossing to remain grade-separated would be reviewed. Accordingly, the Specific Plan and the Draft EIR have not been revised per this comment, and the Draft EIR does not need to be revised and recirculated.</p>
A8-6	<p>Third, the area near the station entrance is the heart of the planned TOD. This plaza area is planned for public open space, and is intended to serve Millbrae as a locale for farmers' markets, performances, and community events. Occupying this valuable area with a widened road does not support the Project Objectives for TOD in the Specific Plan area, or the goals expressed in the community meetings held to discuss the Specific Plan and proposed TODs. Specifically, the</p>	<p>See Responses to Comment A8-4 and A8-5.</p>

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	objectives include "[d]esign and construct a project that accommodates the needs of transit service providers to ensure safe and reliable transit access continues" and "[d]esign and construct a project that provides publicly accessible open spaces" (page 3-65) which are not consistent with widening South Station Road.	
A8-7	Both the DEIR and the Draft Specific Plan are silent on how the proposed widened South Station Road would help achieve the Project Objectives or benefit the Specific Plan area or the community. In the absence of the not-yet-released Station Access Plan, we cannot examine any data on the necessity for, or benefits of this roadway.	See Responses to Comments A8-4 and A8-5.
A8-8	Finally, the DEIR and Draft Specific Plan are inconsistent in describing the location and scale of the proposed South Station Road expansion. Per the Draft Specific Plan, "new development shall convert South Station Road from one-way to two-way traffic between Garden Lane and Adrian Road," (page 7.10). However, per the DEIR, Policy P-CP 16 specifies "Expand the South Station Road as a two-way street connecting from the station entrance to Adrian Road," (page 4.13-39). This is a longer road, and cuts through the heart of the TOD's public plaza. Even more dramatically, the Draft Specific Plan also says, "South Station Road shall be extended to the north and to the east to meet the service road south of the BART parking garage, and to connect to Rollins Road. Connecting South Station Road to the service road requires a major infrastructure improvement, potentially including the relocation of some of the BART station structures," (page 7.26). Figure 7-8 illustrates "a typical proposed section of South Station Road" at 64 feet. Disturbingly, the Draft Specific Plan and its related DEIR appear to be contemplating three different roadway scenarios, one of which would require demolition of the main entrance and a significant portion of the station, and two of which would irreparably damage the proposed TOD.	See Responses to Comments A8-4 and A8-5.
A8-9	Given the foregoing, the Specific Plan Update must be revised to delete P-CP 16, or the DEIR must be augmented, revised, and recirculated to assess and mitigate the unexamined impacts discussed herein.	See Responses to Comments to A8-4 and A8-5.
A8-10	COMMENT 3 Related to the above, P-CP 12 should be modified to avoid confusion. As stated in the DEIR, P-CP 12 identifies a policy to: "Provide bus and shuttle transfer	Policy CP 12 of the Specific Plan has been revised in both the Specific Plan and Chapter 3 of this Final EIR to clarify that pedestrian access is a priority followed by transit/shuttle access and is consistent with the Specific Plan. This revision does not

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	<p>facilities near station entrances on both the east side and west side of the Millbrae Station to accommodate the peak projected vehicles to support bus and shuttle as a priority access mode to BART, Caltrain, and future rail service, such as High Speed Rail (HSR)." Taken out of context, this could suggest bus and shuttle access are the priority access modes to the station, and are to be prioritized as the access modes to be located closest to the station entrances. The P-CP 12 statement conflicts with BART's Access Hierarchy, in use since 2003 and attached here as Exhibit A, which prioritizes pedestrian access over bus and shuttle access.</p> <p>Note to Reader: See Attachment A8-1.</p>	<p>affect any conclusions or significance determinations provided in the Draft EIR. Please refer to the revised policy below:</p>
A8-11	<p>If Policy P-CP 12 is not revised, the DEIR should be revised and recirculated to address, and propose new mitigation for, a new or substantially more severe significant impact from implementing the policy; see CEQA Guidelines Section 15088.5. Pursuant to CEQA Guidelines Appendix G, conflicts with applicable policies such as policies established by a transit agency may constitute significant environmental impacts. The Guidelines provide that lead agencies should consider any "conflicts with adopted policies regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities." (CEQA Guidelines, Appendix G, Paragraph XVI(f)). P-CP 12 should be revised to eliminate conflicts with BART's Station Access Management and Improvement Policy Framework and BART's Access Hierarchy, which were developed to minimize negative performance or safety impacts on BART's station access and circulation. Per the Access Hierarchy, bus and shuttle transfer facilities may not be prioritized to the detriment of pedestrian access. The following more accurately reflects the relative value of buses and shuttles as station access modes: "Provide bus and shuttle transfer facilities <u>reasonably</u> near station entrances on both the east side and west side of the Millbrae Station. to accommodate the peak projected vehicles to support bus and shuttle as a priority access mode to BART, Caltrain, and future rail service, such as High Speed Rail (HSR)." The language of "Eastside Access" on page 4.13-71 appropriately describes the shuttle functions and transfer locations.</p>	<p>See Response to Comment A8-10.</p>
A8-12	<p><u>Corrections and additions for the DEIR</u></p>	<p>The comment introduces corrections to the Draft EIR that are listed in the comments</p>

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	For the Final EIR, please consider the following modification, and make these corrections.	that follow. No response is required.
A8-13	Modify Table 4.13-8, Millbrae BART Train Schedule, to include the number of BART trains per day in both directions. This information is included in Table 4.13-9, Millbrae Caltrain Train Schedule, and should also be provided for BART. Together, this information would accurately portray the density of rail service at the station.	As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to include the number of BART trains per day in both directions. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
A8-14	Correct page 4.13-22, paragraph 2. BART operates 45 (not 44) stations. And our daily ridership exceeds 430,000 on weekdays (not 375,000).	As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to correct the number of BART stations per the commenter's request. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
A8-15	Again, thank you for the opportunity to review the DEIR. We look forward to continuing our work with the City to bring a significant and public-serving development to Millbrae. Please do not hesitate to contact me for any reason.	The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
Attachment A8-1	BART Access Hierarchy figure	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
A9	Laura Thompson, Bay Trail Project Manager, Association of Bay Area Governments	
A9-1	Attached are comments on this Draft EIR from the San Francisco Bay Trail Project. Please let me know if you have any questions.	The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
A9-2	On behalf of the San Francisco Bay Trail Project, I am submitting comments on the Millbrae Station Area Specific Plan Update and Transit-Oriented Development #1 and #2 Draft Environmental Impact Report. The San Francisco 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, 341 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.	The comment does not identify a specific concern regarding the adequacy of the Draft EIR, nor does the comment raise a new environmental issue. The comment introduces the comments that follow and each of these comments is more precisely addressed in the responses to comments provided below. The comment is acknowledged and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.

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Number	Comment	Response
	<p>The vision, goals and policies outlined in the specific plan and the development proposals described in the DEIR present an exciting opportunity to maximize the potential of a major Bay Area transit station. The policies support improvements that will not only provide a safe and direct bicycle/pedestrian connection between the Bay Trail and the transit station, but will also complete an important section of the Bay Trail around the perimeter of the project area. The following comments focus on the Millbrae Station Area Specific Plan and the Bay Trail improvements proposed as part of TOD #1 and TOD #2.</p>	
<p>A9-3</p>	<p>Millbrae Station Area Specific Plan (MSASP)</p> <p>The updated specific plan emphasizes the importance of multi-modal circulation in and around the transit station/development area and the need for bicycle/pedestrian facilities that are available to people of all ages and abilities. It offers guidance for future development and public improvements in the Plan Area and identifies the Bay Trail as an important facility in the plan project area. One of the primary goals of the updated specific plan is to:</p> <p>Strengthen the pedestrian and bicycle policies to support current and future needs.</p> <p>The new development proposals TOD #1 and TOD #2 should be held to the following specific plan policy:</p> <p>New development in the Plan Area is expected to provide pedestrian and bicycle connections through sites in order to facilitate connections between the station, the Plan Area, Downtown, and The City has a whole. Projects will need to set aside space to accommodate publicly accessible pedestrian and bicycle pathways.</p>	<p>The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
<p>A9-3</p>	<p>Figures 4-3 and 4-4, Pedestrian and Bicycle Circulation Concepts, indicate the preferred Bay Trail route along the perimeter of the specific plan area, connecting the proposed bicycle/pedestrian bridge over Highway 101 to the Bayside Manor neighborhood -- all along a multi-use pathway separated from traffic. The path would run adjacent to Aviator Road, along the north side of the Highline Canal</p>	<p>The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their</p>

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Number	Comment	Response
	<p>and following the long edge of Site 8 behind a wide landscaped buffer, connecting to existing trail at Hillcrest Boulevard. Figure 4-10 shows this concept in more detail.</p> <p>This proposal is consistent with Bay Trail design guidelines and the goal of implementing a Class I trail fully separated from traffic. The Class I facility is of particular importance in this project area because of anticipated high volume of vehicles and transit shuttles. For the first time, Millbrae residents and visitors will have a safe and direct non-motorized option for traveling between residential/commercial areas, the transit hub and the city's bay shoreline.</p> <p>While the specific plan policies in Chapter 7 related to bicycle facilities encourage Class I or Class II facilities, it is our strong preference to see that Class I facilities are constructed along all parts of the Bay Trail implemented within the specific plan project area. A Class III facility is not considered Bay Trail and would remain shown as an incomplete segment on all Bay Trail maps.</p> <p>Streetscape Standards: Aviator Avenue, page 7.29</p> <p>The facility proposal for the Bay Trail along Aviator is clear in the specific plan:</p> <p>A separated bicycle/pedestrian path shall be provided on the east side of the street to connect from the planned bicycle/pedestrian bridge to a potential Bay Trail alignment through the Bayside Manor neighborhood.</p>	<p>consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p> <p>The comment is noted and the Specific Plan will be clarified to recommend Class I facilities for all Bay Trail segments in the Specific Plan Area.</p>
A9-4	<p><u>Missing Streetscape Standards</u></p> <p>The specific plan is missing two proposed trail connections that are within the plan boundaries: the Bay Trail alignment along the north side of Highline Canal and along the long edge of Site 8 at the north side of the plan area. These sections should be included to show a complete and continuous Class I Bay Trail facility along the entire edge of the plan boundaries. Not requiring TOD#1 and TOD #2 to construct these additional sections of trail would violate the specific plan policy listed at the top of this page.</p>	<p>The Project Site Plan as shown for TOD #1 and TOD #2 are conceptual site plans made available to the City for the purposes of environmental review. Upon adoption of the Specific Plan, final project plans will be revised to be consistent with the proposed trail connections.</p>
A9-5	<p><u>TOD #1 and TOD #2</u></p>	<p>Figure 3-35 for TOD #2 Pedestrian and Bicycle plan are conceptual and made available</p>

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Number	Comment	Response
	<p><u>Figure 3-35 TOD#2 Pedestrian and Bicycle Plan</u> This figure shows the proposed Class I facility along the eastern side of Aviator Avenue, but it does not show a continuous Bay Trail along the Highline Canal and Site 8. The specific plan policies and images clearly require new development to provide these improvements, also shown in Figures 3-13 and 3-14.</p>	<p>for the purposed of environmental review. Upon adoption of the Specific Plan, final project plans will be revised to be consistent with the continuous Bay Trail along the Highline Canal and Site 8.</p>
A9-6	<p><u>Page 4-13-135 TOD#2 Bicycle and Pedestrian Facilities</u> This EIR should go further to require TOD #2 to provide the entire Bay Trail alignment along the project area boundaries (except for the bicycle/pedestrian bridge over Highway 101). The development will encourage many more visitors to the area and it is critical that a continuous Bay Trail alignment be constructed as part of the development consistent with the specific plan policies.</p>	<p>The commenter expresses a request for additional requirements for the TOD #2 developer in the Draft EIR. However, CEQA does not require mitigation measures for impacts that are not found to be significant, the mitigation measures in this EIR are only for impacts that were found to be significant. In addition, the City cannot require project sponsors to build improvements on land that they do not control. Since the City of Millbrae controls the land on the north side of Highline Canal and Site 8, completion of the Bay Trail along these segments could be added as a Condition of Approval for TOD #2.</p>
A9-7	<p>With the release of this Draft EIR and development plans, the City of Millbrae is missing an opportunity to see that a short but critical section of regional Bay Trail network be constructed as part of TOD #1 and TOD #2. Construction of these sections of trail along the perimeter of Site 8 and the Highline Canal is supported by the Millbrae Station Area Specific Plan vision, goals and policies as well as the City's General Plan policies and would greatly benefit the community by creating a safe and direct bicycle/pedestrian connection between the Bayside Manor neighborhood, the transit center/proposed development and the City's bay shoreline.</p>	<p>The comment expresses an opinion about the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p> <p>See Response to Comment A9-6.</p>
A9-8	<p>Please contact me at 510-464-7935 or laurat@abag.ca.gov if you have questions about this letter or the Bay Trail in general.</p>	<p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
A10	<p>April Chan, Executive Officer, Planning and Development, San Mateo County District</p>	
A10-1	<p>The San Mateo County Transit District (SamTrans) is pleased to provide the following comments on the Draft Environmental Impact Report (DEIR) for the Millbrae Station Area Specific Plan (MSASP) Update and Millbrae Transit-Oriented Developments (TOD) #1 and #2.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>

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Number	Comment	Response
	<p>SamTrans strongly supports a well-planned transit-oriented development that enhances the function of the Millbrae Intermodal Transit Center and appreciates the opportunity to participate in this important planning effort. The Millbrae Intermodal Station is a critical component of the region's transportation network, with connections between Caltrain, Bay Area Rapid Transit (BART), SamTrans, and shuttles that combined improve mobility, reduce congestion, and drive economic development across the peninsula.</p> <p>We believe that the MSASP and TOD projects need to accommodate all modes of access as vital to the success of this multimodal center moving forward. Regional rail services like BART and Caltrain (and potential future High Speed Rail) rely heavily on transit, shuttle, pedestrian, and bicycle access to ensure customers have first- and last-mile connections. Without those connections, potential riders will opt not to use those rail services, unnecessarily constricting potential ridership.</p> <p>As noted in the Notice of Availability (NOA) and the DEIR, the City of Millbrae is using a programmatic CEQA clearance approach where one CEQA document (Program EIR) will be used for both the MSASP and the TODs #1 and #2. While SamTrans understands the streamlining benefits of this approach as it relates to the MSASP, we find it insufficient in regards to the TOD components. Regardless, we are writing to provide our comments for the plans and projects in three different sections.</p>	
A10-2	<p>MSASP PROGRAMMATIC DEIR</p> <p>SamTrans views the potential development sites around the Millbrae Intermodal Station as an opportunity to improve pedestrian, bicycle, transit, and shuttle access to the station. Developing an overarching station area plan is a clear step towards improving access for these modes as well as building housing and other commercial/office uses in the area. With comprehensive planning, this will in turn address current demands related to population growth, transit ridership and socio-economic landscape.</p> <p>The MSASP embodies the type of compact, mixed-use, transit-supportive, and</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>

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Number	Comment	Response
A10-3	<p>people-friendly development and improvements supported by SamTrans and its mobility initiatives.</p> <p>As a sponsoring agency of the Grand Boulevard Initiative, SamTrans suggests several clarifications to the description of the Grand Boulevard Initiative in the MSASP. The Grand Boulevard Initiative scope encompasses 1/2 mile on each side El Camino Real. While supporting coordinated policy decisions is one component of the Grand Boulevard Initiative, the main goal is to support planning and implementation efforts that transform the El Camino Real Corridor into a place for residents to work, live, shop, and play and create links between communities that promote walking and transit and an improved and meaningful quality of life. This vision is embodied in the Grand Boulevard Initiative Guiding Principles, which were adopted by the City of Millbrae in 2008 (Grand Boulevard Planning District, Ordinance 726).</p>	<p>As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to include additional details about the Grand Boulevard Initiative in Chapter 3, Project Description, per the commenter's request. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p> <p>For consistency, the Specific Plan has also been updated to include this language.</p>
A10-4	<p>To enhance the pedestrian environment on El Camino Real and provide meaningful connections to the transit network, it is important that the MSASP ensure complete pedestrian access at the envisioned pedestrian paseos connecting the Millbrae Intermodal Station with El Camino Real. Pedestrian crossing enhancements should be provided at the main paseo gateway to improve overall connectivity to the adjacent residential neighborhood and downtown, ensure safe access to the Caltrain, BART, and SamTrans transit services, and provide improved multi-modal connectivity with the southbound SamTrans bus service on El Camino Real.</p>	<p>The comment provides suggestions for the Specific Plan to address pedestrian facilities, and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Pedestrian access on El Camino Real will be accommodated by sidewalks that would be widened to a minimum of 12 feet. A pedestrian crossing on El Camino Real at the pedestrian paseo is not included in the Plan. A crossing at this location would need to be signalized due to the high traffic volumes and speeds on El Camino Real. The existing signalized crossing at Millbrae Avenue would be used by pedestrians destined to points south along El Camino Real or to the west. Pedestrians destined to downtown Millbrae Avenue would use the improved signalized crossing at Victoria Avenue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
A10-5	<p>SamTrans highly recommends a comprehensive access study to determine type and adequacy of access that would support connectivity between the two TOD projects and easiness of station accessibility for riders.</p>	<p>The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The City is currently undertaking a separate Station Access Plan and a Draft Millbrae Station Access Improvement Plan was submitted to the City on August 26,</p>

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Number	Comment	Response
A10-6	<p>TOD #1 - PROJECT-LEVEL DEIR</p> <p>While SamTrans appreciates the opportunity to review the concept plans for the potential development of TOD #1, we find the document lacks the same level of detail and description as is available for the MSASP as a whole or TOD #2. Additional work and increased level of coordination with the transit agencies must be done prior to any serious consideration of the plans proposed for TOD #1. If adequate level of planning detail is not provided prior to preparing the final EIR, we would formally request the City pursue a separate project-specific EIR for TOD #1. We are concerned that including it within this combined document may impede progress on TOD #2, which is demonstrably further along in the planning process.</p> <p>The Site Plan for TOD #1 does not include adequate detail for review of transit facilities and other modes of access. The lack of information about how and where buses or shuttles would access the station is an illustration of insufficient detail on TOD #1.</p>	<p>2015. As part of this Station Access Plan, access between the two TOD sites would be provided by existing sidewalks and a future multi-use pathway on the north side of Millbrae Avenue, as well as through the Station While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p> <p>The comment expresses an opinion about the level of detail provided for TOD #1 and a concern that these inadequate details will delay the review of the TOD #2 project. The comment notes that the TOD #1 project does not include adequate level of details for a review of transit facilities and other modes of access, but does not specify what additional details are needed. Impacts related to adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities are discussed in Chapter 4.13, Transportation and Circulation, under Impact TRANS-13. Impacts were determined to be less than significant with implementation of Mitigation Measure TRANS-TOD#1-13. The comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process.</p>
A10-7	<p>Another element of concern is the use of property owned by SamTrans. The property underlying the proposed new public roadway "Railroad Avenue," as set forth in TOD #1 was purchased by SamTrans on behalf of BART for construction of the Millbrae BART Station, which was built as part of BART'S SFO Extension. As set forth in "Stipulated Settlement Agreement Re: City of Millbrae's Disclaimer of Interested" filed on July 28, 1998 in San Mateo Superior Court Case No. 405695, the property is to be conveyed to the City of Millbrae "subsequent to the execution of a development agreement by the City that includes development of Site 1 as contemplated in the Plan... ". The "Plan" refers to the Millbrae Station Area Specific Plan, adopted on November 24, 1998.</p>	<p>The comment expresses a concern about the ownership and future use of the property underlying the proposed new public roadway described as "Railroad Avenue" in the Specific Plan Update. However, the comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process.</p>

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Number	Comment	Response
A10-8	<p>The proposed Site Plan for TOD #1 is not consistent with the above mentioned Plan, which included a widened and realigned California Drive Extension located in the general location of proposed Railroad Area, as it is shown in proposed TOD #1. Any request to convey this property that is not consistent with the terms of the Stipulated Settlement Agreement must be approved by the SamTrans Board of Directors, at their sole and complete discretion.</p> <p>SamTrans is willing to consider recommending that the board consider such a transfer, even if the TOD #1 final site plan is not entirely consistent with the Plan, provided that the site plan for TOD #1 is otherwise able to sufficiently accommodate current and future transportation and access needs at this vital transit hub.</p>	See Response to Comment A10-7.
A10-9	<p>Since BART also has an interest in the property acquired by SamTrans, we recommend close coordination and consultation with BART prior to building Railroad Avenue.</p>	The comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process.
A10-10	<p>TOD #2- PROJECT-LEVEL DEIR SamTrans strongly supports BART's vision with respect to increasing density and offering a variety of transit-related uses connecting to the station on the TOD #2. There is a significant link between density and rail ridership and this development represents an opportunity to create a strong connection between ridership and economic activity in the area.</p> <p>Shuttle riders will rely on having shuttles as close to the rail station as possible. It is therefore imperative that the plan have sufficient area to accommodate all identified current and future shuttle needs. Additionally, the shuttles need to be close enough to station access points to enable shuttle riders to make timed connection with BART and/or Caltrain.</p> <p>SamTrans recommends that shuttles should serve the station via the EVA Access/Service Road and either turning around in the circle at the end of the road or being routed south across the site via South Station Road. No shuttles should be located east of Rollins Road. The area along Garden Lane east of Rollins Road should be for SamTrans fixed-route bus access and layover.</p>	The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.

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Number	Comment	Response
A10-11	<p>We believe this proposed project is substantially further along than TOD #1, but still has a number of issues that need to be addressed prior to certification of the EIR:</p> <ul style="list-style-type: none"> • The DEIR is inconsistent with respect to the site plan and circulation plan for TOD #2. Figure 3-15 is the same map used in the MSASP (Figure 4-5), but the circulation elements of DEIR Figure 3-28 do not match those two circulation plans. The figures should be revised. • Figure 3-28 does not represent the Task Force discussions and agreements regarding shuttle and transit circulation and should be considered outdated. SamTrans does not view this Site Plan as an accurate representation of what the City and developer had agreed with respect to transit and shuttle access. 	<p>The Project Site Plan as shown for TOD #1 and TOD #2 are conceptual site plans made available to the City for the purposes of environmental review. The City has commissioned the Draft EIR on the proposed TOD projects for the following purposes:</p> <ul style="list-style-type: none"> • To satisfy CEQA requirements; • To inform the general public, the local community, and responsible, trustee, and State and federal agencies of the nature of the Project, its potentially significant environmental effects, feasible mitigation measures to mitigate those effects, and its reasonable and feasible alternatives; • To enable the City to consider the environmental consequences of approving the Project. • For consideration by responsible agencies in issuing permits and approvals for the Project. <p>Upon Project approval, precise project-specific plans will be required as part of the Project approval process and will be required to be consistent with the adopted Specific Plan. During review and issuance of building permits for each project the City would review all development plans for consistency with applicable regulations and development standards,</p>
A10-12	<p>SamTrans also has some concerns regarding the methodology used for traffic forecasts associated with this project given the inconsistencies between different site plans and circulation patterns. We believe a holistic approach to pedestrian, transit, shuttle, and bicycle access to the site will serve as a "win-win" to effectively reduce private vehicle trips through the site.</p>	<p>The commenter expresses an opinion regarding the methodology and traffic forecasts applied in the Draft EIR, but does not provide specific information on how the methodology and traffic forecasts should be revised. As described in Chapter 4.13, Transportation and Circulation, the traffic forecasting methodology incorporates the latest research on the vehicle trip reducing capabilities of mixed-use developments, as well as transit ridership projections that include Caltrain electrification. The comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process.</p>
A10-13	<p>Lastly, SamTrans wants to convey our commitment to partner with the City, BART, and developers to craft a vision for tangible improvements to the Millbrae Intermodal Station and its adjacent development sites. We believe some clear, achievable steps can be taken to clarify the DEIR, improve access to the station, and lay the foundation for future development and transit service that will significantly benefit the Millbrae community in the area. We urge the City to continue to work closely with its stakeholders to address the handful of outstanding concerns to ensure the station continues to be a regionally significant</p>	<p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>

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Number	Comment	Response
A11	Marian Lee, Executive Officer, Caltrain Modernization Program, Caltrain	
A11-1	<p>On behalf of the Peninsula Corridor Joint Powers Board (JPB), Caltrain is submitting the following comments on the Draft Environmental Impact Report (DEIR) for the Millbrae Station Area Specific Plan (MSASP) Update and Millbrae Transit-Oriented Developments (TOD) #1 and #2.</p> <p>The Millbrae Station is a regionally significant transit asset and is one of Caltrain's highest ridership stations providing intermodal connections between our system and BART, the San Francisco International Airport (SFO) and California's future High Speed Rail System. The MSASP area provides valuable opportunities to plan and develop TOD because of the substantial public investment in transit facilities at the station.</p> <p>Caltrain supports the City of Millbrae's vision for high quality TOD in the Millbrae station area and we look to the MSASP and its constituent projects to maintain and enhance multimodal access to the station so that this facility can continue to realize its full ridership potential.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
A11-2	<p>Over the last two years, Caltrain staff has participated on the MSASP Technical Advisory Committee and has raised deep concerns about how the MSASP as a whole and the two proposed TOD projects in particular may impact existing and future access to the station. Progress has been made in talking through these concerns, however, substantial access impacts and appropriate mitigations are not adequately addressed in the DEIR. This is an overriding concern at the programmatic level and more so at the project level related to TOD #1 and TOD #2.</p> <p>We recommend that access issues within the MSASP area be addressed through the development of a comprehensive station access plan. This will provide Caltrain with adequate information to ensure that proposed developments and land uses will not diminish the functionality of the Millbrae station. Access capacity at this important regional hub cannot be compromised - it needs to be</p>	<p>The commenter expresses a concern about access related impacts and the appropriate mitigation; however, the commenter does not provide specific details about access related impacts nor what mitigation should be included. The Specific Plan addresses station access for all travel modes, and subsequently, the Draft EIR provides an analysis for all modes of transportation and access in Chapter 4.13, Transportation and Circulation, of the Draft EIR. In addition, as part of a separate project, the Draft Millbrae Station Access Improvement Plan was submitted to the City on August 26, 2015 and addresses station access on the eastside (i.e. TOD #2 project area). The comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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	sufficient and robust to support planned future transit services and development.	
A11-3	We would like to meet with the City of Millbrae and relevant stakeholders to discuss how to resolve our concerns as noted above. Resolution will be critical to timely implementation of TODs that enhance the Millbrae community as well as the station's existing and future transit functions. Thank you for your consideration of our comments. I can be reached at 650-622-7843 or leem@samtrans.com. We look forward to continuing our work with you on this important effort.	The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
A12	Tom Madelena, City/County Association of Governments of San Mateo County	
A12-1	<p>Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Millbrae Station Area Specific Plan Update and Transit Oriented Development (TOD) #1 and #2 projects. The project is both for the adoption and implementation of the Millbrae Station Area Specific Plan Update and associated general plan and zoning ordinance amendments as well as the approval and construction of Transit-Oriented Developments (TOD) #1 and #2.</p> <p>The City/County Association of Governments of San Mateo County (C/CAG) is the designated Airport Land Use Commission for San Mateo County. Airport Land Use Commissions fulfill a state mandated function and have the responsibility to provide for the orderly development in the environs surrounding airports and to protect the viability and future operation of airports.</p> <p>This project is located within the Airport Influence Area established for San Francisco International Airport as identified in the adopted Airport Land Use Compatibility Plan (ALUCP) for the Environs of San Francisco International Airport. This project falls under the State of California Public Utilities Code 21676. This code requires that prior to the amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within the planning boundary established by the airport land use commission pursuant to California Public Utilities Code Section 21675, the local agency shall first refer the proposed action to the commission. If the commission determines that the proposed action is inconsistent with the commission's plan, the referring agency</p>	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The City is aware of the procedures described by the commenter and is currently in the process of having the Millbrae Station Area Specific Plan Update reviewed by the ALUC prior to adoption of the Specific Plan Update for a determination of consistency with the ALUCP. See Response to Comment A1-1.

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Number	Comment	Response
	<p>shall be notified. The local agency may, after a public hearing, propose to overrule the commission by a two-thirds vote of its governing body if it makes specific findings that the proposed action is consistent with the purposes stated in Public Utilities Code Section 21670. At least 45 days prior to the decision to overrule the commission, the local agency governing body shall provide the commission and the division a copy of the proposed decision and findings.</p>	
A12-2	<p>Please contact me if you have any questions regarding the Airport Land Use Compatibility Plan consistency review process.</p>	<p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
A13	SaraT L. Mayer, Director of Public Health Policy and Planning, San Mateo County Health System	
A13-1	<p>Please see attached comment letter for the Millbrae Station Area Plan DEIR from ST Mayer, Director, Public Health Policy and Planning, San Mateo County Healthy System.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
A13-2	<p>We appreciate the opportunity to comment on the Millbrae Station Area Specific Plan and Millbrae Station Area Draft Environmental Impact Report (DEIR).</p> <p>Get Healthy San Mateo County recognizes that while we focus on treating the flood of chronic diseases and other preventable health conditions in San Mateo County, we must also change the environments in which people live to prevent people from getting sick in the first place. Where we live impacts our health dramatically. We work collaboratively with Cities, community-based organizations and leaders across the County to promote policies to prevent diseases and ensure everyone has equitable opportunities to live a long and healthy life. To make this a reality, people must live in safe, affordable, walkable, bikeable, transit-rich communities.</p> <p>The Millbrae Station Area Specific plan takes strong steps in this direction with strategies such as dense, mixed-use development, enhanced bicycle and pedestrian connectivity and transit supportive retail and office land uses in close proximity. This encourages walking, bicycling and transit use. The plan could be further strengthened by addressing the issues described below in the DEIR and</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>

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Number	Comment	Response
	Station Area Specific Plan.	
A13-3	<p data-bbox="321 399 541 427"><u>Population and Housing</u></p> <p data-bbox="321 431 1073 553">The proposed plan is projected to add as many as 1,750 new dwelling units to the plan area. This is of real significance and an exciting opportunity for Millbrae. Housing is the cornerstone of a healthy community. Those who live in healthy, affordable housing live longer, healthier lives due to improved health outcomes.¹</p> <p data-bbox="321 589 1073 837">The City of Millbrae Housing Element identifies the Millbrae Station Plan Area as a "Housing Opportunity Area". Housing Opportunity Areas as per the Millbrae Housing element are those that have the potential to 1) deliver sales or rental units at low or below market rate prices or rents and 2) meet special housing needs for local workers, single parents, seniors, small families or large families. <i>Housing Opportunity Areas are locations where the City has committed to make special efforts to provide affordable housing consistent with other General Plan policies.</i></p> <p data-bbox="321 873 1073 1060">We commend the City for showing leadership and commitment to addressing the current affordability crisis within their community - currently 71% of renters and 46% of owners in the City of Millbrae spend more than 30% of their income on housing.² However, the DEIR and plan has some shortcomings and we suggest the following ways in which the Plan could be strengthened to effectively address the needs of current and future Millbrae residents.</p> <p data-bbox="321 1096 974 1219">Footnote 1: "The Impacts of Affordable Housing on Health: A Research Summary", Center for Housing Policy, May 2011, http://www.nhc.org/media/files/Insights_HousingAndHealthBrief.pdf Footnote 2: Millbrae 2015-2022 Housing Element</p>	<p data-bbox="1094 399 1906 586">The comment does not identify a specific concern regarding the adequacy of the Draft EIR, nor does the comment raise a new environmental issue. The basis for the commenter's concern is contained in their comments that follow and each of these comments is more precisely addressed in the responses to comments provided below. The comment is acknowledged and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.</p>
A13-4	<p data-bbox="321 1230 1073 1325">I. The DEIR Fails to Analyze the Impacts of Foreseeable Housing Costs and the potential indirect displacement of existing residents within the Plan Area caused by increased market rents as the area becomes more desirable.</p> <p data-bbox="321 1360 1073 1421">The DEIR's (Section 4.11.13) assertion that the proposed plan would not displace substantial numbers of existing housing is incorrect. There are currently 308</p>	<p data-bbox="1094 1230 1906 1385">The displacement of individuals as a result of rising housing costs cannot be attributed to the proposed Project since it would be speculative to conclude whether or not a similar increase in housing costs would occur without implementation of the Project. See Response to Comment A2-6 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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Number	Comment	Response
	<p>residential units with approximately 816 residents in the Plan Area. As noted in the City's 2015 Housing Element, displacement can be caused directly as landlords upgrade housing, or indirectly as rents rise. An overwhelming body of evidence now indicates that improvements such as those suggested by the station area plan often trigger increases in housing costs, raising a significant risk that the plan could cause displacement of existing residents.</p> <p>The DEIR and the MSASP have not examined or included information about the</p> <ul style="list-style-type: none"> • socio-economic status of the existing residents living within the plan area or • the current affordable housing stock within the plan area • the vulnerability of residents in the Plan Area to involuntary displacement <p>Without this information, the DEIR cannot adequately determine the extent to which the changing market conditions around the Station Area will impact existing residents or lead to a shortage of residential units affordable to low-, very low- and extremely low-income households within the Plan area. Even if 15% of new units built are affordable to very-low and low-income households, it is still likely that economic pressures will put significant displacement pressure on existing lower-income residents of the Millbrae Station Area.</p> <p><u>Recommendation: The DEIR should analyze the Socio-Economic Impacts caused by vulnerability of displacement of existing residents.</u></p>	
A13-5	<p>II. The DEIR does not analyze the environmental impacts caused by displacement of small businesses.</p> <p>Small local businesses are an essential part of any community. In addition to offering essential goods and services, these businesses provide employment for local residents, an essential aspect of community health and well-being.^{3,4} Also, small business owners tend to live locally and therefore spend earnings locally, supporting a strong local economy.</p> <p>As per the MSASP (pg 25), "Millbrae businesses primarily offer convenience and neighborhood-serving goods and are concentrated in sectors that serve shoppers' daily needs, such as restaurants, bakeries, grocery stores, salons, etc.</p>	<p>Consistent with the CEQA Guidelines Section 15131, Economic and Social Effects, the Draft EIR is not meant to address quality of life, and economic or financial issues, rather, the purpose of CEQA and the Draft EIR is to fully analyze and mitigate the Project's potentially significant physical impacts on the environment to the extent feasible. Furthermore, predicting the Project's physical impacts on the environment without firm evidence based on facts to support the analysis would require a level of speculation that is inappropriate for an EIR. Displacement of small business in the Specific Plan Area as a result of desirability or increases or rents due to new development would be speculative given that there are no policies in the Specific Plan that stipulate rent increases or other cost increases associated with operating a business, small or otherwise; therefore, no additional analysis is required as part of this EIR. See Master Response, Standards for Responses to Comments, and Focus of</p>

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Number	Comment	Response
	<p>Retail vacancy rates are very low in Millbrae and available spaces are unlikely to remain vacant for long."</p> <p>"New household growth is likely to generate demand for between 67,734 and 357,491 square feet of new retail in Millbrae between 2010 and 2040" (pg 30). The low vacancy rates along with significant demand for new retail space will increase the desirability of the Plan Area and likely cause a further increase in the already high commercial rental prices. Rent increases can make it difficult for existing businesses to remain viable and profitable. In addition, new construction within the Plan Area and proposed street improvements along El Camino Real, can threaten viability of local businesses through disruption in level of sales and business during construction.</p> <p><u>Recommendations: The DEIR should:</u></p> <ol style="list-style-type: none"> 1. Analyze and mitigate the direct construction impacts on <i>small businesses</i> 2. Analyze and mitigate the negative impacts of socio-economic displacement of small business. <p>Footnote 3: Feinstein, J. (1993). The Relationship Between Socioeconomic Status and Health: A Review of the Literature. <i>Milbank Quarterly</i>, 71, 279-322. Footnote 4: Yen H & Syme L. (1999). The Social Environment and Health: A Discussion of the Epidemiologic Literature. <i>Annual Review of Public Health</i>, 20, 287-308.</p>	<p>Review of Commenters.</p>
<p>A13-6</p>	<p>III. The DEIR and Plan must identify and analyze mitigation measures that would lessen the impacts of the plan and protect existing residents and local businesses from potential displacement</p> <p>Once appropriate analysis has been conducted to identify the impacts of the plan on housing and commercial affordability and displacement, the DEIR should include measures for alleviating the identified environmental impacts.</p> <p>a. The Plan lacks the specificity and implementation tools to ensure that</p>	<p>While home prices and rents may rise, with the exception of the one housing unit to be displaced by TOD #1, existing uses would be permitted to continue with implementation of the proposed Project. It is speculative to determine that housing costs or the cost of commercial space would increase more with implementation of the proposed Project than without. Displacement is not a concern under CEQA to the extent that negative impacts related to socio-economic displacement would only be mitigatable if they manifest themselves in physical impacts. Since there is no evidence to suggest that implementation of the proposed Specific Plan Update would result in physical impacts related to economic displacement, it is not reasonably foreseeable that blight or urban decay would result. In order for legitimate mitigation measures to be recommended, the</p>

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Number	Comment	Response
	affordable units for all income levels are effectively produced, or targeted to meet the City's Regional Housing Need Allocation.	EIR would need to find that a significant impact would result in the absence of mitigation. Since the Project would not result in any significant impacts related to displacement, mitigation would not be justifiable. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters. The portion of this comments that talks about implementation tools of the proposed Specific Plan Update pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
A13-7	The commitment to ensuring 15% affordable units via an Inclusionary Zoning Policy within the plan area is a great step, however the MSASP currently lacks the specificity and implementation tools to ensure that affordable units for all income levels are effectively produced. Currently pg 4.30 of the MSASP states the following: <i>"Designate the Plan Area as a Housing Opportunity Site consistent with the Housing Element and require at least 15 percent affordability for residential projects to the extent consistent with prevailing law"</i> . The policy language as currently included in the MSASP is not sufficient to ensure that 15% of all units produced will be affordable across the varying income levels.	The comment expresses an opinion about affordable housing and asserts that the current policy language in the Specific Plan requiring affordable housing is not sufficient, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
A13-8	The City so far doesn't have a great track record of providing for the housing needs of its very low- and low-income populations - less than 1% of housing produced between 2007-2014 was very-low or low income housing while 90% of housing was above moderate income housing (<i>See Table 1 for more details</i>). It is highly likely that in the absence of specific target requirements for the production or protection of extremely low, very low and low income housing units within the MSASP, the city may fail to meet its 2015-2022 RHNA obligations (<i>See Table 2</i>). Inclusion of specific targets would be in line with the City's 2015-2022 Housing Element policy (<i>HJP-18</i>) to "encourage housing development, including a below market allocation that maximizes production of very low income units" in	The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the "CEQA process," the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.

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Number	Comment	Response
	Housing Opportunity Areas i.e. the Millbrae Station Area.	
A13-9	<p><u>Recommendations: The Draft Plan should be amended to</u></p> <p>1. Address and mitigate the potential for displacement and implement strategies to support development without displacement. These strategies include the protection of existing residents, preservation of housing at all affordability levels, production of new housing units at a diversity of affordability levels, participation of community members and leaders in housing decisions including identifying challenges and solutions related to displacement potential and placement of housing in places near transit and amenities that present opportunities to support residents health in a comprehensive holistic way.</p>	Displacement of existing residents and businesses in the Specific Plan Area as a result of rising home prices or rents due to new development would be speculative given that there are no policies in the Specific Plan that stipulate rent increases or other cost increases associated with cost of living and there are no proposed land use changes that would displace residents or businesses; therefore, no additional analysis is required as part of this EIR. See Response to Comment A2-6 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
A13-10	a. Policies to protect residents from displacement in non-deed restricted housing through Rent Stabilization and Just Cause Evictions policies	See Response to Comment A2-6 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
A13-11	b. Policies to support preservation include No Net Loss Policy for Affordable Housing and Right to Return policy for displaced residents.	See Response to Comment A2-6 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
A13-12	c. Potential policies for production of new affordable housing units are as follows: • Establish <u>affordable housing unit targets by income level</u> for the Plan Area to meet income level targets as set out in the 2015-2023 RHNA (<i>See Table 2 for details</i>).	See Response to Comment A2-6 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
A13-13	• Consider creating tiers <u>for the current inclusionary zoning policies</u> , requiring fewer affordable units if a developer chooses to produce units at deeper levels of affordability i.e. housing for extremely low, very low and low incomes.	See Response to Comment A2-6 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
A13-14	• Since it is currently illegal to require inclusionary units for rental units, the city should adopt an <u>affordable housing and commercial linkage impact fee on new residential and non-residential development</u> in the plan area (as discussed in City of Millbrae's Housing Element, HIP 29 and HIP 33). Fees should be calculated at or above the cost of providing 15% of units on site and below the rate presented in the forthcoming San Mateo County nexus studies. ⁷	See Response to Comment A2-6 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
	Footnote 7: file:///C:/Users/jsharma/Desktop/Public%20Draft%20Model%20Commercial%20Nexus%205_12_15.pdf and	

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Number	Comment	Response
A13-15	<p>file:///C:/Users/jsharma/Desktop/Public%20Draft%20Model%20Residential%20Report_5_12_15.pdf</p> <p>• <u>Apply City of Millbrae's Housing Element policy CHIP-32) to promote production of "Affordable Housing Development on City-Owned and Other Agency-Owned Land" to the Millbrae Station Area</u>, where BART-owned land offers the opportunity to colocate lower-income households who depend on transit proximate to excellent transit facilities. In particular, the city should consider AB 2135 as it applies to the disposal or lease of public land by a local agency for the provision of not less than 25% of the total number of housing units for persons of low or moderate income at affordable housing costs or rent.</p>	<p>See Response to Comment A2-6 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
A13-16	<p>2. Include an effective small business retention program or set of strategies in the final plan and the DEIR to protect small businesses. These include a. Financial and Business Coaching, Façade Improvement Assistance, Assistance Negotiating Long-Term, Affordable Leases, Assistance Preparing for Code Compliance</p>	<p>See Response to Comment A2-6 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
A13-17	<p><u>TRANSPORTATION</u></p> <p>Our health is directly impacted by the environment in which we live. Environments that support and promote modes of transport other than driving, i.e. walking, biking and public transit, can achieve a number of positive health and community impacts, including: 1) preventing chronic diseases by increasing everyday physical activity, 2) reducing vehicle-related injuries and deaths, 3) facilitating independence and access for disadvantages groups and 4) reducing respiratory illnesses through improving environmental quality by reducing air pollution and greenhouse gas emissions.</p> <p>The Millbrae BART and Caltrain Stations serve as a primary transit linkage in the Peninsula, carrying thousands of passengers a day. However, the area is currently neither accessible nor safe for cyclists and pedestrians. As seen in the Millbrae Grand Boulevard Hot Spot Analysis Map attached at the end of this letter, the El Camino Real and Millbrae Avenue intersection which is at the heart of the plan area is a hotspot for bicycle and pedestrian collisions. Additionally, a number of collisions have occurred midblock on El Camino Real, which is likely a</p>	<p>The comment provides background information, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The Plan includes a comprehensive pedestrian network with 12-foot (minimum) sidewalks on both sides of all commercial streets, including El Camino Real. The Plan includes fully accessible directional curb ramps at all intersection corners and modified signal timings to accommodate crossing speeds of 3 feet per second. These features help make the Plan area more walkable and safer for people of all ages and abilities. The Plan includes multi-use paths and bicycle lanes to improve bicycle access and safety. The Specific Plan's treatment of El Camino Real incorporates these Complete Streets design features. However, the Plan addresses only a short segment of El Camino Real. A better opportunity for a more comprehensive complete street treatment of El Camino Real could be the forthcoming City of Millbrae General Plan Update. The MSASP does not preclude future bicycle facility enhancements on El Camino Real. While no additional response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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	<p>result of pedestrians attempting to cross El Camino to access the transit station. La Cruz Avenue, which is just outside the Plan Area boundary, is ranked as the 5th most dangerous intersection in the county.⁸</p> <p>The plan includes number of elements and improvements to create a safe environment for people using a variety of travel modes through bike routes, improved sidewalks and crossings, pedestrian refuge islands, pedestrian scale lighting, intermodal connectivity, Transit Demand Management Programs, etc. However, additional mechanisms to implement "Complete Streets" policies and design elements are needed to ensure safe access for all users, including pedestrians, bicyclists, motorists and transit riders of all ages and abilities.</p> <p>Footnote 8: Preliminary results from the San Mateo County Collision Report</p>	
A13-18	<p><u>Recommendations: The Draft Plan should be amended to</u></p> <p>1. Conduct and include a traffic analysis to determine the feasibility of:</p> <p>a. Reducing ECR from 6 to 4 lanes with turn pockets, and dedicating the additional ROW (Currently 120 feet) to protected (Class IV) bike lanes, and/or BRT facilities.</p> <p>While few studies have evaluated the results of 6 to 4 lane reductions, there are a wide range of studies that have examined 4 to 3 lane road diets, finding a 29% reduction in crashes.⁹</p> <p>Footnote 9: Federal Highway Administration, Highway Safety Information System (HSIS). Summary Report: Evaluation of Lane Reduction "Road Diet" Measures on Crashes. http://www.fhwa.dot.gov/publications/research/safety/10053/10053.pdf</p>	<p>The comment includes recommendations for reducing roadway lanes and increasing bike lanes, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The effects on all travel modes of changing El Camino Real from six to four lanes would more appropriately be addressed through a study of a larger geographic area including the entire City of Millbrae and adjacent jurisdictions, such as in the forthcoming City of Millbrae General Plan Update. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
A13-19	<p>2. Include bus signal prioritization, especially for intersections with long delays. See the SamTrans "El Camino Real BRT Phasing Plan Existing Conditions Report" for more information.¹⁰</p> <p>Footnote 10: http://www.samtrans.com/Assets/Existing+Conditions.pdf</p>	<p>The comment provides a recommendation for bus signal prioritization in the city, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Bus signal prioritization on El Camino Real would be more appropriately addressed as part of a holistic study of multimodal operations on El Camino (see Response to Comment A13-18). While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the</p>

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Number	Comment	Response
A13-20	3. Reduce the number of travel lanes, width of travel lanes and crossing distance on El Camino Real (ECR) to slow vehicular traffic speeds that pose a safety concern for pedestrians attempting to cross El Camino.	<p>decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p> <p>The comment includes recommendations for reducing roadway lanes, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters. See Response to Comment A13-18.</p> <p>The Specific Plan includes bulbouts as a measure to reduce pedestrian crossing distances.</p>
A13-21	<p>a. Long crossing distances and multi-lane roadways dramatically increase crash risk.¹¹ Additionally it is likely that pedestrians will continue to cross mid-block from the west side of El Camino to the transit station despite the lack of safe and dedicated infrastructure. Reducing crossing distance with bulb-outs, and utilizing traffic calming measures to slow traffic along El Camino along the transit station area (Millbrae Ave to La Cruz Ave where the collisions concentrate) can help prevent bicycle and pedestrian collisions.</p> <p>Footnote 11: http://www.fhwa.dot.gov/environment/bicycle_pedestrian/publications/sidewalk2/sidewalks208.cfm</p>	<p>The comment includes recommendations for reducing roadway lanes, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters. See Response to Comment A13-18.</p> <p>The Specific Plan includes bulbouts as a measure to reduce pedestrian crossing distances.</p>
A13-22	4. Provide a safe method for crossing midblock from the west side of El Camino directly to the transit station, ideally through an overcrossing as proposed in the 1998 Millbrae Station Area Plan.	<p>The comment includes a recommendation for safe mid-block crossing, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters. Also, see Response to Comment A10-4. An overcrossing is not included in the Plan due to the</p>

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Number	Comment	Response
A13-23	<p>5. Utilize more robust multi-modal level of service (LOS) standards, or other metrics to more effectively evaluate and prioritize changes to the transportation network in the Plan Area and across the City.</p> <p>a. The City currently uses traditional automotive level of service criteria to evaluate projects and its impact on the transportation network. As already noted in the MSASP DEIR, California is in the midst of revising CEQA guidelines to evaluate projects on the basis of greenhouse gas reduction and multimodal access (as called for by SB 743) rather the automotive level of service. Many cities have already taken leadership by adopting multimodal level of service standards (MMLOS), or otherwise designating places like the Millbrae Station Area for standards that prioritize transit and active transportation and encourage safety. The Millbrae Station Area planning process represents a key opportunity for the City to consider adopting these updated standards.</p>	<p>amount of land area required for the ramping system, the high cost, and the experiences of other communities that built pedestrian overcrossings and found that pedestrians prefer to cross at-grade.</p> <p>The comment includes a recommendation for safe mid-block crossing, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters. Also, see Response to Comment A6-6. The significance criteria in the EIR are based on policies adopted by the City of Millbrae and other agencies. The adoption of updated standards would be addressed in the forthcoming City of Millbrae General Plan Update.</p>
A13-24	<p>Thank you again for the opportunity to comment on the Millbrae Station Area Specific Plan and DEIR. We'd like to foster a strong relationship with the City and support you in your efforts to build healthy, equitable communities across Millbrae. We would welcome the opportunity to provide more detail or support to the city in evaluating and developing a suite of housing and business preservation and complete streets policies that are right for Millbrae.</p> <p>We have expertise in mapping, research and data analysis, as well as policy development and implementation related to building healthy, equitable communities. We have a number of team members that are trained planners, some of which have worked as local planners for years. We can also offer communication support, on issues of displacement in particular that can be difficult to communicate.</p> <p>Please contact Jasneet Sharma, Senior Community Health Planner atjsharma@smcgov.org or 650.573.2208 for questions or additional information.</p>	<p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
Attachment	<p>Millbrae Grand Boulevard Hot Spot Analysis: Pedestrian and Bicyclist Collisions</p>	<p>The attachment to the comment is acknowledged for the record and will be forwarded to</p>

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Number	Comment	Response
A13-1	2001-2002 figure	the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project. The City has examined the attachment and concluded that it does not warrant any revisions to the EIR.
A14	Patricia Maurice, District Branch Chief, Local Development - Intergovernmental Review, Caltrans	
A14-1	Millbrae Station Area Specific Plan Update - Draft Environmental Impact Report Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for alignment with sustainability, livability, economy, and safety and health values. Our comments seek to promote the State's smart mobility goals that support a vibrant economy and build active communities rather than sprawl. They are based on the Draft Environmental Impact Report (DEIR).	The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
A14-2	Trip Generation Table 4.13-15 Specific Plan Trip Generation (Person-Trips), page 4.13: The table shows AM generated vehicle trips of 1,956 vehicles per hour (vph) resulting from the Specific Plan update. The table does not show PM generated vehicle trips. The project likely generates significant PM vehicle traffic due to the large scale of residential, office and retail land uses. We recommend the document include PM generated vehicle traffic and ensure the AM (PM) inbound and outbound generated traffic be assigned to all gateway intersections in the project area.	As shown in Chapter 4.13, Transport on and Circulation of the Draft EIR, Table 4.3-15 shows 28,383 daily vehicle trips, 1,928 AM peak hour vehicle trips, and 1,956 PM peak hour vehicle trips. The PM peak hour vehicle trips are accounted for in the impact analysis. No further analysis per the commenter's recommendation is required.
A14-3	<i>Cultural Resources</i> We are in agreement with the mitigation measures outlined in the Cultural Resources section of the DEIR. The project location has only been 35% surveyed by professional archaeologist and the area is sensitive for unknown buried archaeological sites. Avoidance is the preferred mitigation for archaeological sites under the California Environmental Quality Act (CEQA). Archaeological monitoring is not appropriate mitigation prior to evaluation of a resource. CEQA Guidelines 15126.4(b)(3) provides a discussion for archaeological mitigation.	The comment is acknowledged and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
	Should ground -disturbing activities take place as part of this or future projects within the state right-of-way (ROW) and there is an inadvertent burial discovery,	

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	<p>in compliance with CEQA, PRC 5024.5 and 5097 and the Caltrans Standard Environmental Reference, Chapter 2 (http://ser.dot.ca.gov), all construction within 50 feet of the find shall cease. The Caltrans Office of Cultural Resource Studies, District 4, shall be immediately contacted at (510) 286-6336. A staff archaeologist will evaluate the find within one business day after contact.</p>	
A14-4	<p><i>Encroachment Permit</i> 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: Mr. David Salladay, 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/permist/.</p>	<p>The comment is acknowledged and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project. The City will submit encroachment permit applications, where required.</p>
A14-5	<p>Please feel free to call or email Sandra Finegan at (510) 622-1644 or sandra.finegan@dot.ca.gov with any questions regarding this letter.</p>	<p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
<p>PRIVATE INDIVIDUALS AND ORGANIZATIONS</p>		
B1	<p>Comments from Joint City Council and Planning Commission Meeting</p>	
B1-1	<p>DAVID CRABBE: My name is David Crabbe. I represent the Sierra Club Sustainable Land Use Committee. We have just begun to review this massive document that you have -- very complicated. And it seems to be a lot of good things in the visions and the goals of the project -- of the thing, but the truth was in the details just how this all comes together. And we respectfully ask that the comment period be extended to 75 to 90 days to give the public a real opportunity to get into the nuts and bolts of this document. Thank you.</p>	<p>As described in Chapter 1, Introduction, of the Draft EIR, in compliance with Section 21080.4 of the California Public Resources Code, the City circulated the Notice of Preparation (NOP) of an EIR for the proposed Project to the Office of Planning and Research (OPR) State Clearinghouse (SCH), as well as interested agencies and persons, on September 19, 2014 for a 30-day review period. In the interests of the citizens of Millbrae and all interested parties, the City extended the comment period of the NOP to November 24, 2014 for a 67-day review period. In accordance with Section 15105 of the CEQA Guidelines, the Draft EIR requires a 45-day review period. As described in Chapter 1, the Draft EIR was available for review by the public and interested parties, agencies, and organizations for a 45-day comment period starting on Wednesday, June 24, 2015 and ending on Monday, August 10, 2015. As such, CEQA requirements related to the review period for the Draft EIR were fulfilled. The Sierra</p>

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Number	Comment	Response
B1-2	<p>BETH ANDERSON: Beth Anderson, 1208 Frontera Way, Millbrae. I think the plan overall looks very good. I'm interested to see the implementations of it. I have one question, and that is about parking. You have taken away some BART parking, which we really badly need. And I, for one, don't live within walking distance to BART. So SamTrans does not provide us any transportation, so how are we going to get from our homes to take BART if there is no parking and no transit? That's my question.</p>	<p>Club has been noticed at each phase of the CEQA noticing process.</p> <p>The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The TOD #2 project would result in a net reduction of 566 BART parking spaces. Travel options include adjusting travel times to coincide with time periods with available parking, parking at other BART stations, getting dropped off/picked up, or using a taxi or shared ride service such as Uber or Lyft. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B1-3	<p>JOSIE TERRITO: Hi. I'm Josie Territo, and I live at 640 Taylor Boulevard. My question partly is parking as well. I don't know how many of you that are not Millbrae residents consistently drive up and down Millbrae Avenue specifically from the freeway up to El Camino Real. We are already impacted with traffic. We cannot take any more traffic. We cannot take an entrance into some galleria that's housing multiple businesses without impacting our families here.</p>	<p>As discussed in Chapter 4.13, Transportation and Circulation, the EIR evaluates the impacts of the added traffic generated by the land use changes in the Specific Plan.</p>
B1-4	<p>My other comment is you kind of glossed over the noise. Those people that live behind there all own homes. They all have children. When you dig up the area, what are you going to do for them to protect them from any kind of asbestos or anything else that's in the ground? And the noise level has got to be unbearable.</p>	<p>As described in Chapter 4.10, Noise, of the Draft EIR, the construction activities would comply with Municipal Code Section 9.05.020 and General Plan Policy NS1.4. This would ensure that construction work would be limited to the permitted daytime hours. Overall, construction activities would generally be restricted to the least noise-sensitive portions of the day, and maximum noise levels would be infrequent throughout the workday for the approximate 9-year duration. Implementation of Mitigation Measure NOISE-TOD#1-4 and Mitigation Measure NOISE-TOD#2-4, would reduce construction related noise from the TOD #1 project and the TOD #2 project to a less-than-significant level.</p> <p>As discussed in Chapter 4.7, Hazards and Hazardous Materials, compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials used during construction would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur, and impacts were determined to be</p>

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		less than significant. Implementation of Mitigation Measures HAZ-SP-4a through HAZ-SP-4c for future development under the Specific Plan where known hazardous materials are known to occur and implementation of Mitigation Measure HAZ-TOD#2-4a through HAZ-TOD#2-4c for the TOD #2 project site would result in less-than-significant impacts related to hazardous materials during construction.
B1-5	My other comment, and I am almost embarrassed to say this, but with the restaurant Tai Wu was such a fiasco with the Planning Department, I am reluctant to even say I would want this project in Millbrae, because I feel that it was a real poorly -- a very poor project done by the Planning Department. Too many problems, too many issues. Thank you.	The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
B1-6	BILL WILLIAMS: Good evening. My name is Bill Williams. I live in Burlingame and commute through the Millbrae station every day. Right now I drive most of the time. I have tried biking, right now it's just not safe to bike. I've tried walking. It's just too far. I've tried riding the bus. There is no bus that goes there. My comment would be that the 70 percent car parking or car access to this area is sort of a self-fulfilling prophecy unless we place a strong emphasis on increasing transit service, making bike lines that are safe to ride in, hopefully protected bike lanes in accordance with the latest national road design standards, and ensure that bike lanes and sidewalks are comprehensive and connect not only the Station Area but to neighboring communities. Thank you.	The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project. Improved multimodal access to Millbrae Station is an important concern, and the Plan aims to enhance pedestrian, bicycle, and transit access to help reduce the drive-alone mode share.
B1-7	ELIZABETH RIDER: Thank you. Elizabeth Rider. I speak for my mother also, Barbara Rogers, 219 Beverly Avenue. The Millbrae Station Traffic Plan Report has a signalized intersection capacity analysis that was done by Matthew Crane, March 24th, 2014. It's dated. There's been quite a lot of development since then. The traffic analysis needs to be redone before the board even considers anything. Also in that traffic analysis, grades A through F, Millbrae Avenue and El Camino intersection gets a letter G, which isn't even on the schedule. F is operation with delays unacceptable to most drivers occurring due to oversaturation, poor progression, or very long cycle lengths. So already the intersection gets a letter G, like "goat," and something needs to be done about that and addressed prior to any more development being done in town. And please redo your traffic analysis. Thank you.	The comment requests a revision of the traffic analysis from March 2014, but provides no substantial evidence as to why the traffic analysis provided in the Draft EIR should be revised. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters. The traffic analysis presented in Chapter 4.13, Transportation and Circulation of the Draft EIR is comprehensive and was prepared applying the buildout projections for the proposed Project as described in Chapter 3, Project Description, of the Draft EIR. It includes traffic generated by all approved and pending developments in the area. The results of the analysis show that the intersection of El Camino Real and Millbrae Avenue currently operates at LOS E, an unacceptable level. The intersection is projected to operate at LOS F with excessive delays, as stated by the commenter. No additional analysis is required as a result of this comment.

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B1-8	<p>GALE GRINSELL: Okay. Great. My -- the concerns I'd like you to address are, number one, water, and, number two, today I saw on Millbrae Patch that we are -- I forget what they call it. But there isn't enough electricity, so they have asked us to -- what do they call it? -- flex alert. Now, with all of this new development, how are you planning to get us water and more electricity? Thank you.</p>	<p>The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project. See Chapter 4.14, Utilities and Service Systems, of the Draft EIR for a complete discussion on impacts related to water supply and energy demands.</p>
B1-9	<p>JOHN KEEFER: John Keefer. I'm with the Millbrae Park and Recreation Commission. My question is if we're talking about EIR and we're talking about the quality, we're taking things away, obviously, when we put things in. One of the things I would like to see is greenbelts added. And you're talking about aesthetics, you're talking about quality of life, and people have voiced other concerns about traffic and impact. But what are we adding to the City of Millbrae in terms of recreation? I think we need more areas. We are a very constrained city compared to other cities. I would like to see any developments that come into the City be part of the community and join in and share and help out our community. I think too often we see these developments come in and all they do is they take things away. I want to see developments come in, and I want to see them add to the quality of the life of our kids and our adults. Thank you.</p>	<p>The commenter expresses a concern regarding the amount of parks in Millbrae, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project. As described in Chapter 4.12, Public Services and Recreation, compliance with General Plan policies listed in Table 4.12-8 would ensure adequate parks and recreational facilities in Millbrae are provided for existing and future residents under the Specific Plan Update. Specifically, General Plan Policy LU5.13 requires the City to maintain adequate facilities for the recreation needs of the city and Policy LU5.14 requires the City to assess the need for and construct new recreational facilities as required in the city. In addition, Policy PC1.33 calls for the City to require that all new multi-family residential projects provide a significant amount of on-site open space/recreation facilities for residents or provide a combination of park in-lieu fees and on-site recreational facilities. Finally, Policy PC2.3 calls for the City to exact in-lieu fees according to California Government Code 66477 and the Municipal Code to fund park and recreation facility improvements, and use the interest earned on fees to fund facility maintenance. While the addition of 4,640 new permanent residents would increase the service population, the increase would occur gradually over a 25-year horizon, and compliance with these General Plan policies and continued implementation of the parkland dedication requirements established in the Municipal Code would ensure that additional parkland is provided as development occurs in the city. Accordingly, impacts were found to be less than significant.</p>
B1-10	<p>PERKY RAMROTH: Hello. I'm Perky Ramroth. I live at 1191 Millbrae Avenue, and I am the grandmother of three children in our school district. I haven't heard any mention of how many children will be added to our community with the</p>	<p>The commenter expresses a concern about impacts to schools, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental</p>

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	<p>construction of these hundreds and hundreds and hundreds of more units. We already have two or three very large condo and apartment complexes that are completed, which probably added many more children to our district. My understanding is that the school district is at or near -- nearly at capacity, and that they aren't taking transfers from other communities. I'd like to hear from a representative of the school district and the City to understand where the new school will be built to accommodate the hundreds, perhaps hundreds more children that will be added to our community. Thank you.</p>	<p>issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project. As described in Chapter 4.12, Public Services, of the Draft EIR, development allowed by the Specific Plan Update would be subject to development impact fees in accordance with the provisions of Senate Bill 50, as well as parcel taxes. The payment of development impact fees is deemed to fully mitigate the impacts of new development on school facilities, per California Government Code Section 65995. Therefore, overall, impacts related to the Millbrae Elementary School District and San Mateo Union High School District would be less than significant.</p>
B1-11	<p>GALE GRINSELL: Thanks. For the record, Gale Grinsell, 1310 Millbrae Avenue. So you can probably guess that I want to talk to you about traffic. This is a huge development between 101 and 280. The only road that is a direct connecting road is Millbrae Avenue, which is a two-lane curvy road, very dangerous, 25-mile-an-hour speed limit. In some places it is 25 miles an hour. People have asked for more stop signs on that street, and we have been told that because of --- because of the need for fire trucks, ambulances, this being the direct route between these two freeways, it's a very important transit artery, and they can -- there are no more stop signs. So I think that -- I'm trying to imagine people trying to ride their bicycle down Millbrae Avenue. In the morning, it is so busy you would not believe. It's hard for people to get out of their driveways. So I think that you need to give extra consideration to traffic particularly along that corridor. Because you know that many of the people coming to this development will be coming on 280, and how are they going to get down there? Millbrae Avenue. Thank you.</p>	<p>The commenter expresses a general concern about traffic, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the project. As discussed in Chapter 4.13, Transportation and Circulation, the traffic analysis estimates that 3 percent of traffic generated by the Specific Plan would travel on the Millbrae Avenue corridor to the west of the Specific Plan Area. Less than 75 vehicles would be added to this section of Millbrae Avenue in both directions during peak hours.</p>
B1-12	<p>SURESH SATARA: My name is Suresh Satara. I'm an architect. We're working on one of the smaller sites on the west side abutting El Camino. I guess since we're so adjacent to the property, next to CalTrain and the BART station, we're looking at reducing parking. I'd rather than give the parking to the BART sites, if we can. And doing some sort of micro-units of some sort, because we're a transit-oriented site more so than anything else. And I was thinking that maybe the reduction of parking, more transit-oriented apartments or maybe Zip-car type shuttle service and so on might be more appropriate for this site because of its adjacency to CalTrain. That's all I have to say.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.</p>
B1-13	<p>GINA PAPIN: Thank you, Mr. Mayor and Council and Project. I am here to talk</p>	<p>The comment pertains to an aspect of the proposed Project and does not state a</p>

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	<p>more about, I think, TOD -- TOD #2. As a vision here, I'm not seeing actually more of a flow through the transit aspects of this, how it connects with BART, with CalTrain. And also I know that SFO has a plan to extend their people mover into this area station. So I'm not seeing that. I am concerned about that. I really see this TOD #2 as a much bigger project and a more integral project, a project that works together throughout. If you look at some other big transit areas, we're not really doing enough here. I don't see this really as an area for people as far as apartments go and office space. I think the City would actually benefit more from a highly retail area. I think the report was done by the City earlier as to the aspects and the benefit to the City for high-end retail in this area, and I'm just not seeing that in the current proposal. And I know that Republic has really worked hard to develop their project, I just think that this City needs a more vibrant project as we move forward. This is really the entry for the entire Bay Area. We have shuttles going in and out of there now. We have BART trains. We have CalTrain. We hope to have, as SFO has expressed to us, a connection directly to SFO. High-speed rail, everything. This is our opportunity to really make this more than a landmark, a destination for years and years to come. I think we can really, if Millbrae expresses their vision of this project, they can make it happen. We have talked about really bringing in anchor stores, like an Apple Store. Grand Central Station has an Apple Store. The Louvre museum. All these different places. We need something that's going to strongly bring people into this community, and then also connecting them easily to all the transit. I saw that from the TOD #1 that it's going to connect through escalators and bring people right easily through their development. That was really great to see. It should all be that way. Both the TOD #1 and 2 should flow right into the station so that you are not having cars running in and out, you are not having people struggling to get from point A to point B. This has been a problem throughout all the Bay Area in that transit is not connected in an easily flowing fashion for people if they are getting off the BART train or if they are getting on CalTrains and how they get over to the airport. It needs to be more of an effort that blends the entire system easily for commuters, and I just don't see that, and it's my concern with the currently proposed TOD #2 here. I think we can do a lot greater things, and I hope to submit that in the future. Thank you.</p>	<p>specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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Number	Comment	Response
B1-14	<p>GALE GRINSELL: Gale Grinsell, 1310 Millbrae Avenue. My questions are very specific. How many parking places are being lost at the BART station? A number. How many parking places are you setting aside in these new thousands of parking spaces for residents, for people who will be working at these sites? And how many parking spaces are new that will -- we have never had before? Because I think all of these parking projections, it seems to me they are way off. You are taking a lot away. You are going to be bringing in people staying at a hotel. They are going to need places to park. So if somebody wants to go down to this area to get lunch, go to a pumpkin festival, where the heck are they supposed to park? Because if you have got 321 units, there's at least 321 cars. Most everybody is going to have a car, because you cannot get everywhere on public transportation. That's all a pipe dream. Or a bicycle. It's just ridiculous. So I think the parking numbers need to be specified. Thank you.</p>	<p>The comment expresses an opinion, and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p> <p>See Response to Comment B1-2. New developments in the Specific Plan Area would provide vehicle parking, and the number of spaces would depend on use type, proximity to the Station, and proposed parking management strategies approved by the City. TOD#2, as proposed, would provide a total of 1,612 spaces. The parking demand estimates for the Specific Plan take into account the shared parking principles that recognize that different uses experience parking demand during different times of day, and some of that parking demand can therefore be accommodated by the same set of parking spaces. See Chapter 3, Project Description, for a detailed description of the parking requirements and Chapter 4.13, Transportation and Circulation, for a discussion of parking-related impacts; as shown, impacts would be less than significant.</p>
B1-15	<p>COUNCILMEMBER LEE: Well, okay. Anyway, I was hoping to hear what everybody else had to say. But I have a question about the EIR. On the Grant Boulevard plan, there's some -- there are some issues about safety on El Camino. And some of the proposal is to -- is to narrow El Camino and add bus rapid transit, which is a dedicated lane for buses, and hopefully Class 1 or Class 2 bicycle lanes. So I'm wondering if the EIR will take that into consideration. And also, I'm also concerned about the backup that happens daily at the west -- at the Wilson Plaza where the In-N-Out Burger place is. Right now there is a lot of backup going in and backup going out. It's particularly people trying to get onto southbound 101. And so I was looking for that in the EIR. Maybe you can point me there sometime. I want to make sure it's in there. And, again, I thank you for the opportunity, Mr. Mayor, and your work.</p>	<p>See Response to Comment A13-17 and A13-18.</p> <p>The EIR evaluates the impacts of the Specific Plan Update and the TOD #1 project and TOD #2 project. It does not specifically address the concern of driveway congestion in the Wilson Plaza shopping center, as that issue was not identified during the scoping process. This concern is better addressed through a more detailed evaluation of the traffic circulation in the Wilson Plaza shopping center.</p>
B1-16	<p>Ed Chan: I am inquiring about 230 El Camino Real. It is right outside of this project zone and I want to know if this property will be affected in any way. I am planning to operate a retail space and want to make sure there are no issue</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will</p>

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	doing so. Thank you.	be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
B2	Nancy Shaw, 2 Bertocchi Lane, Millbrae, California, 94030	
B2-1	<p>I am writing this letter to comment on the massive Millbrae Station Area Developmental Project.</p> <p>The operative word is "MASSIVE"! How can a small city like Millbrae absorb this kind of instant growth? The increase of 1300 residents from The Sierra Station Properties and the 850 residents from the office development will certainly "tax" the City's infrastructure! How will be able to serve 2000 more residents and their dwellings? Certainly traffic congestion will follow, as well as a dearth of parking space for 2000 more employees. Millbrae can use a more flexible tax base - more homes, more businesses, more hotels, and more restaurants but no on the "MASSIVE" scale!</p> <p>Downtown Millbrae needs to be rejuvenated. The Chamber of Commerce needs to work on sprucing up Broadway and trying to get a large variety of specialty shops and good restaurants to attract people to our city! I have lived in Millbrae for over 45 years and I am proud of the smallness of the city. I can walk everywhere and see people I know.</p>	<p>The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B2-2	<p>Will the new massive development provide MORE open space, MORE parks, MORE recreational activities for its residents? The Millbrae Community Center cannot handle an influx of residents. Will there be an annex to the center? - More parks, more trails, more tennis courts, more fields for kids to play?</p>	See Response to Comment B1-9.
B2-3	<p>Will our school system be able to handle a major growth of students?</p>	See Response to Comment B1-10.
B2-4	<p>There was a lot of controversy when In N Out wanted to move to Millbrae. That whole shopping center across from BART was really good for Millbrae. In N Out brings lots of business to Millbrae. The gas station there is well used, too. The other fast food enterprises are well attended. However, putting the car wash there made the area too crowded. Some days it is difficult to drive by the area on Rollins Road or drive into the shopping area.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.</p>
B2-5	<p>So many parking spaces were eliminated. We certainly could use a new car wash but not there! Parking is at a premium now! And much of the new developments</p>	See Responses to Comments B1-2 and B1-14.

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	will be crowding this small corridor - the gateway to Millbrae.	
B2-6	I could not attend the public meeting on June 30 but I did want to share my concerns. I know I cannot stop progress or stop development but MASSIVE is not the way to go!	The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
B3	Gita Dev, Co-Chair, Sustainable Land Use Committee, Sierra Club, Loma Prieta Chapter	
B3-1	Sierra Club Loma Prieta Chapter appreciates the importance of the Millbrae Station Area as the regional transportation hub for the entire peninsula and a gateway to the San Francisco Bay Area. Our Chapter is an active advocate for Smart Growth in Priority Development Areas and the Sustainable Communities Strategy to address the goals set out in AB32 and SB375 as well as provide for a good jobs/housing fit for our cities. Therefore we look forward to staying involved in the Millbrae Station Area Specific Plan and providing comments to the Draft EIR.	The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
B3-2	<p>The Draft EIR comment period is set to close on August 10th 2015. We are hereby requesting that the comment period be extended to 60 days. We believe this is a reasonable request because:</p> <ul style="list-style-type: none"> - The comment period is during summer when many people are on vacations with their families. - The revised Millbrae Station Area Specific Plan was released at the same time as the Draft EIR (DEIR); therefore the changes to the plan need to be reviewed along with the EIR. -The DEIR is unusually complex and very long. This is because it is highly unusual for a programmatic EIR to be done simultaneously with detailed development proposals that are to be included in the plan. In this case there is not one but two developer proposals included in the MSASP EIR. - The two development proposals are large and complex. These deserve a thorough review as they provide detailed particulars that need to be evaluated in reference to the Station Area Plan Policy Guidelines. 	As described in Chapter 1, Introduction, of the Draft EIR, in compliance with Section 21080.4 of the California Public Resources Code, the City circulated the Notice of Preparation (NOP) of an EIR for the proposed Project to the Office of Planning and Research (OPR) State Clearinghouse (SCH), as well as interested agencies and persons, on September 19, 2014 for a 30-day review period. In the interests of the citizens of Millbrae and all interested parties, the City extended the comment period of the NOP to November 24, 2014 for a 67-day review period. In accordance with Section 15105 of the CEQA Guidelines, the Draft EIR requires a 45-day review period. As described in Chapter 1, the Draft EIR was available for review by the public and interested parties, agencies, and organizations for a 45-day comment period starting on Wednesday, June 24, 2015 and ending on Monday, August 10, 2015. As such, CEQA requirements related to the review period for the Draft EIR were fulfilled. The Sierra Club has been noticed at each phase of the CEQA noticing process.
B3-3	We also believe that there is insufficient notification to the public for the public community workshops to solicit public input for the significantly revised MSASP	As described in Chapter 3, Project Description, the City held two public community workshops in May and June of 2014. The public workshops were noticed through email

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	<p>and the DEIR.</p> <ul style="list-style-type: none"> - The workshops are not a regular council meeting and generally such public participation events are noticed weeks and months in advance, as well as in the press, to ensure that the public is adequately informed. 	<p>distribution, posting and distributing a flyer, noticing on the City's website at: www.ci.millbrae.ca.us. and through posting in the San Mateo Daily Journal newspaper ten days prior to each meeting and on the day of each meeting. Each notice is posted at City Hall at 621 Magnolia Avenue at the Millbrae Library at 1 Library Avenue, and at the TOD #1 and TOD #2 project sites.</p>
B3-4	<p>The Station AREA precise Plan is going to bring big changes to the City of Millbrae and its residents, as well as to the region. We learned, at the City Council meeting on June 30th 2015, that there would be the first of two Community Workshops on July 16th 2015. As of this morning (13th July), we have yet to see any information about such a meeting on the City website or on the MSASP web pages.</p> <p>We have looked at the City calendar and the MSASP web page for a calendar of events for the MSASP, for the first and second workshops and find no information about the public workshops. With 4 days left, a meeting on the 16th will not have received sufficient public notification to reach a wide audience.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The City notices all public meetings in the San Mateo Daily Journal newspaper ten days prior to each meeting and on the day of each meeting. Each notice is posted on the City's website at: www.ci.millbrae.ca.us., at City Hall at 621 Magnolia Avenue, at the Millbrae Library at 1 Library Avenue, and at the TOD #1 and TOD #2 project sites.</p>
B3-5	<p>We look forward to continued involvement in Millbrae Station Area Specific Plan and are requesting a written response to our request for Extension of time for the DEIR comment period. Thank you.</p>	<p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
B4	Pete Pirzadeh	
B4-1	<p>Pursuant to your request we have reviewed the Rollins Road Microsimulation Analysis conducted by Fehr & Peers, dated May 26, 2015 and offer the following comments:</p> <ul style="list-style-type: none"> • The analysis is an operational level analysis utilizing traffic projections for Year 2040. This type of operational analysis works best for existing and near term horizon years due to the large variations that could occur in longer horizon years. • The analysis assumes two at grade pedestrian crossings along Rollins Road. The proposed project includes only one pedestrian crossing at on the northerly side of Rollins Road/Garden Lane intersection. • The analysis includes an alternative (5) which connects the Multimodal Station Road to South Station Road. This roadway connection is identified as the 	<p>The comment expresses an opinion about a supplemental technical study that was prepared as part of the planning process for preparation for the Specific Plan Update; however, the technical study was not applied to any analysis presented in the Draft EIR. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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	<p>preferred alternative. However, this alternative does not improve the projected level of service (LOS) at the intersection of Rollins Road and Millbrae Avenue, which is the most critical intersection providing access to the site. In fact, the during the AM peak period the operation of this intersection is projected to worsen from LOS E to LOS F.</p> <ul style="list-style-type: none"> • The analysis states that placing shuttles on Garden lane would create a pedestrian discomfort and safety issue due to the pedestrian crossing at Rollins Road. However, the recommended connection of Multimodal Station Road to South Station Road would require all pedestrians travelling between the Station and the (BART) garage to cross the path of the shuttles and other vehicles that would be using this roadway. Unlike the proposed controlled pedestrian crossing at Rollins Road and Garden Lane, the ped crossing at the proposed roadway connection would be uncontrolled. • Bifurcating the Station Plaza from the main station garage with the recommended road would disrupt the village and station connectivity with a key element of this Transit Oriented Development plan. • The feasibility of implementing the proposed road connection and associated impacts to the BART station has not been discussed in the study. • The report states that placing the shuttles on Garden lane would discourage riders from using them. This does not seem to be a reasonable concern since these shuttles are Company formed and provide a service to their employees vs. individual riders. • The analysis does not include a technical data set for the recommended alternative. Furthermore, there is no discussion about the added path of travel from South Station Road to Rollins Road, potential operational issues associated with maneuvering the shuttles through the narrow roadway within the existing operational conditions at the intersection of Rollins Road and Adrian Road. • The recommended alternatives seems to be subjective. 	
B4-2	Please call with any questions regarding our comments.	The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.

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B5	Jeffrey Tong, San Bruno Bike & Ped Advisory Committee	
B5-1	<p>The Millbrae Station Area Plan EIR does not incorporate a well-thought out inter-city bicycle transportation route, nor does it even discuss inter-city bicycle route options. It ignores the vision of the Grand Boulevard Initiative vision of making El Camino Real a multi-modal transportation route. As it stands, the proposal for El Camino Real remains 100% automobile focused. Painting a symbol of a bicycle (called a sharrow) onto the pavement of a highway does not make it a bicycle lane. There is no consideration for protected bike lanes separated with a raised median (called cycle tracks) for El Camino Real. It neglects the plight of the poor, who largely do not own cars, and/or those who hold undesirable grave yard working hours. When they need to arrive at work before mass transit begins daily operations, they have ZERO (0) options unless they buy a car - prohibitively expensive due to purchase price, license, insurance, and maintenance costs.</p> <p>Pursuant to Figure 4.13-4, despite claims that El Camino Real (ECR) is too dangerous for bicyclists, it is foolish to justify denying protected bicycle lanes on ECR on the assumption no one will ride their bicycle on ECR, because people ARE bicycling on it - the bravest of souls!</p> <p>Members of San Bruno's Bicycle & Pedestrian Advisory Committee took test rides to and from Millbrae using three different bike routes between Millbrae and San Bruno: (1) El Camino Real, (2) Linden/Magnolia, and (3) San Anselmo/Aviador. Linden and Aviador (#2 and #3) are circuitous, hilly, in poor condition, and are easy for bicyclists to get lost even in the best of weather and light conditions. Imagine after dark, or rainy conditions. This is particularly problematic for long-distance bicyclists who are merely traveling through San Bruno and Millbrae.</p> <p>We concluded that bicycle commuters either traveling northward from Millbrae BART/Caltrain Station to San Bruno, or southward from San Bruno to Millbrae BART/Caltrain Station, must choose El Camino Real - there is simply no viable alternative. El Camino Real is the best route to install cycle tracks between the City of San Bruno and Millbrae BART/Caltrain Station, because a cycle track on</p>	<p>The comment expresses an opinion regarding the EIR's incorporation of a bicycle route; however, the EIR is the environmental review document for the Specific Plan Update and proposed TOD #1 and TOD #2 projects. It is assumed the commenter is referring to the Specific Plan and not the EIR. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. A regional bicycle circulation is an important issue that is best evaluated and addressed through City or regional planning efforts. The Specific Plan covers only a portion of El Camino Real. Therefore, the Specific Plan as designed cannot address inter-city bicycle facilities. Inter-city bicycle facilities are best constructed when part of a comprehensive network. The Specific Plan does not preclude future bicycle facility enhancements on El Camino Real as part of a larger planning effort. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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	<p>ECR will connect with Millbrae BART/Caltrain Station and seamlessly merge southward onto California Drive towards Burlingame and beyond. Traveling in the opposite direction from Burlingame, bicyclists traveling north on California Drive will currently merge into El Camino Real at Millbrae BART/Caltrain Station.</p>	
B6	Community Comments & Questions from Community Meeting	
B6-1	<p>Andrew Boon, East Palo Alto Resident Comment: Where will the Bus Station be relocated and what will it look like after the construction of proposed building?</p>	<p>The comment requests information on the location of a bus station, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The Specific Plan assumes bus transfer facilities on the west and east sides of Millbrae Station. Westside facilities would be provided on California Drive adjacent to the Station, and these facilities would serve southbound SamTrans transit vehicles and other shuttles/buses. Northbound SamTrans transit vehicles would continue to stop on El Camino Real. Eastside facilities for small shuttles/buses would be located on Multimodal Access Road, which runs in the east-west direction adjacent to the BART parking garage between Rollins Road and the eastside Millbrae Station entrance. Eastside facilities for large shuttles/buses would be located at the east end of Garden Lane. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B6-2	<p>Gina Pappan, Millbrae Resident. Comment: What is the impact on the overcrowded School? What impact will the new development have on our Water System? We need to think bigger and expand our vision, make it look like a Grand Central Station. By law this is a High Speed Rail Stop. Will there be High Speed Rail passing thru here?</p>	<p>The commenter requests broad impact question regarding schools, water system, and High Speed Rail (HSR), but does not request specific clarification on any of the subjects. The Draft EIR provides very detailed descriptions of the regulatory setting, existing conditions, and impacts to these topic areas in Chapter 4.2, Public Services and Recreation (schools), Chapter 4.14, Utilities and Service Systems, (water supply and sanitary wastewater). Based on this analysis it was determined that the proposed Project would have less-than-significant impacts with respect to its impact on schools and wastewater facilities; however, as shown in Section 4.14.1, Water Supply, it was determined that a significant and unavoidable impact would result with respect to water supply during single- and multiple-dry years.</p> <p>As described in Chapter 3, Project Description of the Draft EIR, the California High Speed Rail Authority (CAHSRA) is currently undergoing a separate planning process for</p>

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B6-3	<p>Jasneet Sharma, San Mateo County Health System. Comment: Accommodate aging population since Millbrae has an average age of 55-60. What's being done for Bike and Pedestrian safety? She stated cars are being prioritized here and not pedestrians. No one is talking about safe environment and Green Streets.</p>	<p>the HSR and that while the Specific Plan Update has been drafted to consider HSR, the HSR project, which is in a conceptual phase of the HSR planning process, is not evaluated in this Draft EIR. See Response to Comment A7-2 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p> <p>The comment requests information on how the Specific Plan addresses specific demographics and bicycle and pedestrian safety, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The Specific Plan includes a comprehensive pedestrian network with 10-foot sidewalks on both sides of all minor streets and 12-foot (minimum) sidewalks on both sides of all commercial streets, including El Camino Real and Millbrae Avenue. Pedestrian paseos would be provided throughout the Specific Plan Area. The Specific Plan includes fully accessible directional curb ramps at all intersection corners, pedestrian refuges, and modified signal timings to accommodate crossing speeds of 3 feet per second. These features help make the Specific Plan Area more walkable and safer for people of all ages and abilities. The Specific Plan includes multi-use paths and bicycle lanes to improve bicycle access and safety. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B6-4	<p>Gita Dove, Sustainable Land use Committee of the Sierra Club. Comment: In PDA, if you look, there is more preference given to cars and not to pedestrian or bicycles. Solutions are not being provided here.</p>	<p>The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Response to Comment B6-3 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B6-5	<p>Dena Leveen, Friends of Cal trains. Comment: City should look into the transportation pattern near the BART Station Area. City should offer Shuttle pick up throughout the City to reduce vehicles in the BART Station Area.</p>	<p>The comment provides suggestions for the planning area, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. As described in Chapter 4.14, Transportation and Traffic, of the Draft EIR, transportation data was collected for all travel modes in the vicinity of the Millbrae Station, and impacts</p>

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		<p>for all travel modes were evaluated in the Draft EIR. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B6-6	<p>Gale Grinsell, Millbrae Resident. Comment: How will this project make life better for the City? Housing unit is not advisable in the area since the City is already congested. This is more developers based and not in the interest of the residents of Millbrae. Please think more about the residents and not about the Developers profit.</p>	<p>The comment expresses a general concern about quality of life and appropriate uses for the Specific Plan Area, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B6-7	<p>Jeffery Tong, Resident of San Bruno and with the San Bruno Bike and Pedestrian Committee. Comment: Aviador and ECR and Linden. If you put buildings on these streets, this area will look like a tunnel and people will get lost. Have Bicycle Track built between the automobile lanes to reduce vehicles. Take out the Center Island and replace it with Bicycle Tracks.</p>	<p>The comment provides suggestions for bicycle planning for consideration in the proposed Specific Plan and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Responses to Comments A13-17 and A13-18, and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B6-8	<p>Emma Slaeiz, Project Manager in Silicon Valley for the Bike Coalition. Comment: Add a protected bike lane on ECR due to high speed vehicle driving by. I recommend having class 3 buffer bike lanes, Class 2 protected bike lanes and Class 1 simple bike lanes.</p>	<p>The comment provides suggestions for bicycle planning for consideration in the proposed Specific Plan and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Responses to Comments A13-17 and A13-18, and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B6-9	<p>David Crab, Sierra Club. Comment: Are the DEIR and DMSASP posted on the website? How does the approval process works for DMSASP and DEIR? Are TOD1 and TOD2 separate? Will they be approved at the same time? When is the upcoming community</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The City notices all public meetings in the San Mateo Daily Journal newspaper ten days prior to each meeting and on the day of each</p>

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	meeting scheduled? Every details from the projects to approval phase is murky. Inform the public about what will happen 1 month from now have a schedule, have an outlook.	meeting. Each notice is posted on the City's website, at City Hall, at the Millbrae Library at 1 Library Avenue, and at the TOD #1 and TOD #2 project sites. As described in the Notice of Availability of the Draft EIR, copies of the Draft EIR are available for review to interested parties at the Millbrae Library at 1 Library Ave; at City Hall at 621 Magnolia Ave; or on the City's website at: www.ci.millbrae.ca.us . Direct links to download the Draft EIR and Specific Plan are available on the City's website. As described in Chapter 1, Introduction, of the Draft EIR, upon certification of the Final EIR by the City Council, the Council may then consider the proposed Project, which it may approve as presented in this Draft EIR, approve in part, approve with conditions, or deny. In other words, the certification of this EIR does not in and of itself approve any component of the proposed Project. The approval of the Specific Plan Update and the two TOD projects may occur at another time separate from the certification of the EIR and at separate times from one another, if at all. As hearings for the consideration of approval of the Specific Plan Update, TOD #1, and TOD #2 projects are determined, they will be noticed following the City's standard noticing procedures.
B6-10	Tracy Choy, Resident of SSF. Comment: Legislation AB2135 states dispose of public land that there should be priority given to public low income housing. I really wish there is more affordable public housing offered at this project to accommodate low income families. And is the City working with that Legislation in terms of affordable housing? Is this project for the resident or Millbrae? Or is it for everyone? We need a balance of both but priority should be given to those who work and live in the City of Millbrae.	The comment expresses a concern for additional affordable housing in Millbrae and provides information on affordable housing law, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Response to Comment A2-5 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
B7	Catherine Quigg, Planning Commissioner, City of Millbrae	
B7-1	The week went by so quickly that I did not call you to schedule an appointment	The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
B7-2	As I briefly mentioned, I am concerned about the parking situation both for Bart riders and for Millbrae Residents. Although I hear that this type of development will generate more transit users because Millbrae intermodal station we will continue to attract automobiles to our stations.	The comment expresses a concern about parking, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and

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B7-3	Another concern is that since this development will generate transit users it will also generate Bicycle riders; therefore; we need to ensure safety for the bicycle riders.	<p>will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Response to Comment B1-2 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p> <p>The comment provides a suggestion for the Specific Plan to consider bicycle safety, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Response to Comment B6-3 and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B7-4	Years ago the City had thought of creating a partnership with the Fairfield Hotel development to create parking for the residents however this did not occur. Perhaps it is time to re-evaluate the Parking situation in Millbrae----Several years ago the citizens of Millbrae voted to evaluate the need of a parking structure in the downtown	The comment provides background information on past parking strategies in Millbrae and suggests it is time for new parking solutions, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The Specific Plan allows for a future parking structure on Site 1 that would provide public parking. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
B7-5	With the addition of numerous units and offices I feel the DEIR did not address a clear and safe path from both projects to the downtown/schools/existing services	See Responses to Comments A10-4 and B6-3.
B8	Jackie To	
B8-1	I am a resident of Millbrae since 2006. I want to express the concerns regarding the following:	The comment serves as an opening remark and introduces the comments to follow. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
B8-2	1) New Bart Parking Lot Redevelopment- Wouldn't this add substantial traffic to Millbrae Ave? The traffic is already quite bad now.	The comment provides a broad question about traffic impacts and does not state a specific question. Traffic impacts are evaluated in Chapter 4.14, Transportation and Circulation of the Draft EIR and a detailed regulatory setting, existing conditions and impact analysis are provided. Estimates of the amount of traffic generated by TOD #2 are presented in Tables 4.13-47, 4.13-48, and 4.13-49. The amount of traffic added to

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B8-3	2) Cal-train waiting area on California Avenue - There doesn't seem to be adequate car waiting spaces for the cal-train side on California Avenue. There is a long queue of cars waiting to pick up people from the train station.	<p>Millbrae Avenue is illustrated on Figures 4.13-15. The effects of this added traffic on intersection operations are presented in Tables 4.13-50, 4.13-53, and 4.13-56.</p> <p>The comment makes a statement about Caltrain car waiting spaces, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. California Drive would be extended to the north through the TOD #1 site and intersect El Camino Real at Victoria Avenue. With the road extension there will be increased curb length for cars waiting to pick-up Caltrain riders. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B8-4	3) The pediatrician crossing near Hillcrest to get to Tai Wu. The xing pedestrian crossing seem very dangerous. I think there should be more cops there patrolling to make sure people slow and stop to allow pedestrians to cross.	<p>The comment makes a statement about existing conditions, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The intersection of Hillcrest Boulevard and El Camino Real is a signalized intersection located north of the northern boundary of the Specific Plan Area. No response is required. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B8-5	4) Play structure at Millbrae Meadows Park - I have heard rumors that the two play structures in Millbrae Meadows Park and the Bill Mitchell Park were swapped. Is that true? If it is, is there any way to swap them back? If not, are there plans to add to the play structure at the Millbrae Meadows Park. The structure seems sub-par compared to other Millbrae neighborhood parks and definitely sub-par to the Burlingame ones. If this is done properly, we can encouraged more neighbors to go to the park. At the current status of the structure, not many people will go play there. The Meadows area is missing a walkable and enjoyable park in the neighborhood.	<p>The comment requests information about existing play structures in the city, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No response is required. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B9	Mike Voytovich, 351 Laurel Avenue, Millbrae, California 94030	
B9-1	I am writing to urge you to consider the recommendations of the Sierra Club in regards to pedestrian access and reduced parking:	<p>The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The</p>

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	http://sf.streetsblog.org/wp-content/uploads/sites/3/2015/07/Sierra-Club-Millbrae-Letter-10-16-14.pdf	comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
B9-2	<p>I have lived in Millbrae for over 6 years and I am a daily commuter via Caltrain. I alternate between riding my bike and walking to Caltrain; and, it is an extremely pedestrian and bike unfriendly area.</p> <p>In fact, coming from Millbrae Highlands, I have to cross El Camino at Hillcrest Ave and ride *against* *traffic* and/or on the *sidewalk* because there are no convenient bike routes to and from Caltrain from downtown. I see many other commuters doing this as well.</p> <p>I would urge you to consider making the route between downtown Millbrae and the station as bike and pedestrian friendly as possible, as we have finally have an opportunity to improve the situation moving forward and will not likely have this opportunity again.</p>	The comment requests that the Specific Plan Update consider impacts to pedestrian and bicycle safety, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Responses to Comments A10-4 and B6-3 regarding pedestrian improvements within the Specific Plan area and between Millbrae Station and downtown Millbrae. See Response to Comment B6-3 regarding bicycle facilities within the Specific Plan area. Also see Responses to Comments A13-17 and A13-18 regarding bicycle facilities on El Camino Real. The Specific Plan does not preclude future comprehensive bicycle improvements along El Camino Real. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
B10	Jessica Hudson	
B10-1	<p>My name is Jessica Hudson and I live at 179 Broadway. I would like to urge the City of Millbrae to implement the Sierra Club recommendations for this project. Millbrae will benefit greatly from improved bike and pedestrian access. Our community is already very car-centric and we need to work to move away from that when we can.</p> <p>Thank you for your consideration.</p>	The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
B11	Shiloh Ballard, President and Executive Director, Silicon Bicycle Coalition	
B11-1	I am writing as the President and Executive Director of Silicon Valley Bicycle Coalition (SVBC), a non-profit of over 2,600 members with the mission to create a healthy community, environment, and economy through bicycling for people who live, work, or play in San Mateo and Santa Clara Counties. We would like to provide comments on the Millbrae Station Area Specific Plan (MSASP) and Draft Environmental Impact Report (DEIR), which includes two transit-oriented developments.	The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
B11-2	The DEIR should make specific strides to focus less on traffic congestion and its proxy level of service (LOS) as the focus of CEQA transportation analysis given	See Response to Comment A6-6.

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Number	Comment	Response
	<p>the passage of State Senate Bill 743. The environmental analysis must be primarily evaluative to its promotion of "the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." The initial report cited a reduction of Vehicle Miles Traveled (VMT) as a replacement metric to evaluate transportation impacts and this should be considered.</p>	
B11-3	<p>The MSASP should set transportation goals that support statewide carbon reduction goals, namely those in AB 32, the Global Warming Solutions Act of 2006, which set greenhouse gas emissions reductions targets for 2020 and SB 375, the Sustainable Communities and Climate Protection Act of 2008. This can be accomplished through strategies to reduce VMT and single-occupancy vehicle trips while increasing active transportation options through bicycling, walking, and public transit. The Millbrae station is particularly appropriate for these types of strategies. The MSASP forecasts that bike and pedestrian trips in 2040 will remain at current levels of 3%. We urge Millbrae to set much higher goals for this transit hub, at least 20%, and ensure that infrastructure and encouragement programs are in place to reach these goals. This will also help reduce car traffic and congestion for the city.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. The walk/bike mode shares presented in the Specific Plan represent the walk/bike trips that will occur among the land uses within the Specific Plan Area because of its mixed-use nature that would otherwise be made by vehicles if the uses were separated as in a traditional suburban development. Therefore they do not represent all of the walk/bike trips generated by the uses and do not represent a walk/bike goal. Instead of selecting specific mode share percentage goals, the Specific Plan uses policies and planned facilities to increase pedestrian, bicycle, and transit mode shares to meet carbon reductions. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B11-4	<p>To that end, the MSASP and DEIR should update the bicycle standards to include class IV protected bikeways, which were created in California by AB 1193 in September 2014. Protected bikeways are cycle tracks or separated bikeways, and exact specifications will be published by January 1, 2016.</p> <p>Many cities in California have already implemented these types of bikeways, which research shows are the types of facilities that make people feel the safest (whether biking, driving, or walking) and encourage more people to bike. In particular, for many of the streets where the MSASP recommends Class I or Class II bike facilities, we feel these should be upgraded to buffered or protected bike lanes. Our recommendations for each of the connecting streets outlined in the Plan can be found in the following table:</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. While Class IV bicycle facilities will soon be approved by the state, they have not yet been adopted by Caltrans. Therefore, the Specific Plan and EIR do not include them. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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TABLE 5-1 RESPONSE TO COMMENTS MATRIX

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	<p>We are thrilled to see a potential new Class I multiuse trail connecting the north side of the station; the new bike and pedestrian bridge over Highway 101, and the Bay Trail. This is a major gap that needs to be addressed and will benefit the whole city of Millbrae through recreation opportunities.</p>																												
B11-5	<p>There are several great features in the MSASP and DEIR that will make biking to and from the station and the retail and residential buildings easier and more convenient. We applaud and support the inclusion of robust wayfinding signage at decision points, major intersections, and along routes, with distance markers; stair channels to wheel bikes up and down stairs; bike commuter amenities (showers, lockers, repair stands); and intersection markings for bicyclists. The MSASP also recommends considering expanding Bay Area Bike Share to Millbrae. That is only one option and we urge the city to look at other bike share options as well.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. Bay Area Bike Share is the most established and widespread bike share option in the Bay Area. Alternative bike share options are available, and the MSASP does not preclude the introduction of these services. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>																											
B11-6	<p>To anticipate and encourage more bicycling in and out of the Millbrae station area, we are also recommending that the bike parking guidelines increase the amount of bike parking required.</p> <p>See table:</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. The bicycle parking guidelines included in the Specific Plan are based on national best practices documented in the APBP Bicycle Parking Guidelines 2nd Edition. See Master</p>																											

COMMENTS AND RESPONSES

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B11-7	We are very excited to see the updates to this popular transit hub. There are a lot of great improvements for bikes already in the MSASP. We urge you to consider our recommendations to make it even more friendly to people who bike. Thank you for your consideration.	The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.																					
B12	Paul O’Leary	The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.																					
B12-1	How about adding a Movie Theater? Look what a movie theaters have done to Redwood City and San Mateo over the last 15 years. Phenomenal. There isn't a lot of large open space left for Theaters in Millbrae near Bart/Caltrain.	The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.																					
B13	Gary Black, Hexagon Transportation Consultants	Note that the comment is referencing a figure (i.e. Figure 1) of the Project Area within Specific Plan Area and the TOD #1 project boundary. The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.																					
B13-1	Hexagon Transportation Consultants, Inc. has reviewed the existing and proposed bus and pedestrian access to your development site. Analysis was conducted by comparing the existing transit services to the proposed improvements specified in the Millbrae Station Area Specific Plan (MSASP), Transit-Oriented Development (TOD) Plan, and Draft Environmental Impact Report (EIR). The MSASP outlines improvements to the area surrounding the Millbrae Station. The development area is located within the MSASP and TOD #1 boundary (See Figure 1). The following sections discuss the current transit services and highlight improvements discussed in the MSASP, TOD, and Draft EIR that impact the	Note that the comment is referencing a figure (i.e. Figure 1) of the Project Area within Specific Plan Area and the TOD #1 project boundary. The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.																					

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B13-2	<p>development area.</p> <p>Existing Transit Services</p> <p>Bus Services</p> <p>Bus stops in the site vicinity are located at El Camino Real/Linden Avenue for northbound routes, El Camino Real/Victoria Avenue for southbound routes, and El Camino Real/Murchison Drive for both northbound and southbound routes (See Figure 2). The current plan area is served by SamTrans routes ECR and 397.</p> <p><i>Route ECR.</i> Route ECR is a north-south bus line that provides regional transit service between Daly City and Palo Alto via El Camino Real. The ECR bus line operates with 15 minute headways on weekdays and 30 minute headways on weekends.</p> <p><i>Route 397.</i> Route 397 is a north-south bus line that operates with 60 minute headways in the early morning from 12:30 AM to 6:30 AM, and travels between the Palo Alto Transit Center and Downtown San Francisco.</p> <p>Shuttle Services</p> <p>Shuttle stops in the site vicinity use the Millbrae Station western bus loop, which consists of two shuttle bays in the parking lot east of California Drive, south of Linden Avenue. Currently three shuttle services use the western bus loop.</p> <p><i>Broadway-Millbrae.</i> Broadway-Millbrae is a CalTrain shuttle that operates during the AM and PM commute hours with 20 minute headways. This service is offered in place of the suspension of weekday train service to the Broadway station.</p> <p><i>North Burlingame.</i> The North Burlingame shuttle runs between the Millbrae Station, Mills-Peninsula Health Services, Sisters of Mercy, and the residents of the Easton-Burlingame neighborhood during the weekday commute hours. The North Burlingame shuttle operates during the AM and PM commute hours with 20-30 minute headways.</p>	<p>The comment provides a synopsis of the transit service descriptions in the DEIR and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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Number	Comment	Response
	<p><i>Mercy High School Shuttle.</i> Mercy High School Shuttle provides services for Mercy High School students starting at 7:00AM. The Mercy High School shuttle operates without a strict time schedule. However, in order to get the students to school by 7:55 AM, the last shuttle leaves around 7:40AM.</p> <p>Combined these shuttle services comprise about 8 buses in each direction during the peak hour. The Broadway-Millbrae shuttle will be eliminated when the Broadway Caltrain station reopens, which would reduce the number of shuttle runs to about 5 in each direction during the peak hour.</p>	
B13-3	<p>Millbrae Station Area Specific Plan</p> <p>The Millbrae Station Area Specific Plan (MSASP) along with the Transit-Oriented Development (TOD) Plan and Draft Environmental Impact Report (EIR) propose several improvements that could impact the project area. Improvements proposed by the MSASP, TOD, and Draft EIR, and their influences on the project area are discussed below.</p>	The comment introduces the comments that follow; no further response is required.
B13-4	<p>Roadway Network</p> <p>The MSASP proposes reconfiguring California Drive to be extended north to run alongside the Millbrae Station. With this change, north of Millbrae Avenue, California Avenue will be extended to diverge east slightly and run along the west side of the station and then will curve left to meet Victoria Avenue.</p> <p>The MSASP suggests narrowing Serra Avenue to allow more right of way on California Drive. The plan states that removing the parking lane on the east side of Serra Avenue could move the property line up to seven feet west. Preliminary designs show California Drive to be 36 feet wide, which includes bike lanes, plus another 10 feet where there are bus bays. The MSASP plan recommends that three bus bays be provided along California Drive.</p>	The comment describes the features of the Specific Plan and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No response is required.
B13-5	<p>Transit Circulation</p> <p>The MSASP proposes that southbound buses be rerouted off of El Camino Real to use the reconfigured California Drive, but northbound routes continue to stop</p>	The comment describes the features of the Specific Plan and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No

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Number	Comment	Response
	along El Camino Real. The use of El Camino Real reduces the access time for the buses and speeds bus operations. The plan acknowledges that although these bus routes are encouraged, the ultimate decision to reroute the bus lines will be made by SamTrans.	response is required.
B13-6	<p>Pedestrian Circulation</p> <p>The MSASP identifies several potential locations to construct pedestrian paseos. The plan mandates that a pedestrian paseo be constructed between the west side station entrance and El Camino Real to connect pedestrian traffic to the bus stops on El Camino Real. This paseo will provide a pedestrian walkway directly onto the Millbrae Station platform, which is one level above the California Drive extension street level.</p>	The comment describes the features of the Specific Plan and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No response is required.
B13-7	<p>Conclusions</p> <p>Hexagon has reviewed the Millbrae Station Area Specific Plan (MSASP), Transit-Oriented Development (TOD) Plan, and Draft Environmental Impact Report (EIR). Our key findings and recommendations are summarized below.</p>	The comment serves as an introduction to the list that follows and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
B13-8	<ul style="list-style-type: none"> Northbound bus services will stay on El Camino Real, and pedestrians will use the paseo to access the station, which is on the same level. 	The comment provides recommendations for the Specific Plan and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
B13-9	<ul style="list-style-type: none"> Northbound shuttle services could use the new frontage road. However, using El Camino Real would offer the advantage of a faster travel time and reasonable pedestrian access. 	The comment provides recommendations for the Specific Plan and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
B13-10	<ul style="list-style-type: none"> Southbound bus and shuttle services will be rerouted to the new California Drive so that bus riders do not have to cross El Camino Real. 	The comment provides recommendations for the Specific Plan and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental

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Number	Comment	Response
B13-11	<ul style="list-style-type: none"> A southbound bus stop is needed on California Drive. The total proposed roadway width of 46 feet (36 feet plus a bus bay) is plenty to accommodate traffic, bikes, and buses. 	<p>issue. SamTrans would determine whether their buses would be rerouted. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B13-12	<ul style="list-style-type: none"> A northbound bus stop would provide flexibility to allow northbound buses to use California Drive. To minimize roadway width, the northbound stop should not be located opposite the southbound stop. 	<p>The comment provides recommendations for the Specific Plan and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B13-13	<ul style="list-style-type: none"> One bus stop in each direction on California is sufficient. There is no need for three bus bays. 	<p>The comment provides recommendations for the Specific Plan and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Southbound SamTrans transit buses would be re-routed to California Drive so that southbound transit riders would no longer be required to cross El Camino Real to access the Station. Northbound transit bus riders do not face the same challenge, so the need for a northbound stop on California Drive is not as great. The diversion onto California Drive is a non-benefit for transit operations, so California Drive is recommended for only southbound buses for which the benefit to transit riders is greater. Additionally, California Drive would likely need to be widened if both southbound and northbound SamTrans buses used it, regardless of where the bus stops were located. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B13-13	<ul style="list-style-type: none"> One bus stop in each direction on California is sufficient. There is no need for three bus bays. 	<p>The comment provides recommendations for the Specific Plan and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The bus bays on California Drive would serve not only southbound SamTrans transit service, but also other public and private shuttles and buses. The additional bus bays are required for passenger loading for these services. While no response is</p>

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Number	Comment	Response
B13-14	We appreciate the opportunity to submit this memorandum. Please do not hesitate to contact us if additional information is needed.	<p>required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p> <p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
B14	Douglas Radtke	
B14-1	<p>1) The plans for the purple recycled water piping needs to be worked out specifically and incorporated in the plan. Significant capital improvement funds are going to wastewater mains. I see no reason without proper coordination that the city could not coordinate efforts to place some purple pipes coming from the water treatment plant down Millbrae Ave. We are in the middle of a significant drought, and the inclusion of these pipes and further expansion to greater Millbrae is going to pay off in dividends in the future.</p>	<p>The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. As described in Chapter 4.13, of the Draft EIR, the Specific Plan includes for the provision of purple pipes. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B14-2	<p>2) The plans for the fiber optic lines needs to be considered a high priority. Rollins Roads formerly is a lot of warehouses - which actually makes perfect sense for high speed data centers and IT infrastructure to be placed there. This is the type of development Millbrae needs even though we have the "short end" of Rollins. Data centers require huge capital investments which bring about a ton of sales tax revenue and personal property tax revenue (as well as jobs).</p> <p>Fiber optic lines open up the possibilities of having municipal broadband. The city of Sandy, Oregon had a private company put in municipal broadband at no tax cost for the city. With carefully foresight and planning - I do not see why this broadband could not be harnessed for the good of Millbrae. If the fiber optic line expansion down El Camino is too complex - a system of wireless repeaters could be deployed throughout The City has well. Companies like Google Fiber are actively courting cities for these projects. It is imperative the city get on top of the process and get their place in line to build these public-private partnerships for</p>	<p>The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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Number	Comment	Response
	the good of ALL residents.	
B14-3	3) The plan for the hotel is absolutely absurd. Nobody in Millbrae wants a hotel. None of the people who attended the Plan Millbrae workshops in 2014 wanted a hotel. The hotel should be zoned for housing, period. We are in the middle of a housing and rent crisis. San Mateo County is close to producing 2 jobs for every 1 unit of housing at the pace. San Mateo is building massive office space for Solar City and Go Pro. Where are all these people going to live?	The comment expresses an opinion about the Specific Plan's provision of a hotel, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
B14-4	4) There is no inclusionary housing in the current plan. Consideration should be given towards developing units for those who work in Millbrae. My wife had worked at two restaurants here in Millbrae and firsthand sees the hardship the people in the service industry go through. Nearly all of her coworkers are commuting from the East Bay, sleeping in their cars during break in between lunch and dinner shift. These are hardworking people who contribute to your lunch an dinner here in Millbrae who deserve an opportunity to reduce their commute by HOURS and simultaneously reduce their carbon footprint.	The comment incorrectly states the Specific Plan does not address affordable housing; however, the Specific Plan includes policy language to include 15 percent affordable housing. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
B14-5	5) The plan's goal should be MAXIMUM housing to the maximum heights enforced by the FAA at 100 feet due to the proximity to the airport. You have a major transit hub here in Millbrae and the majority of jobs being in San Francisco already on the BART line and more being produced in Redwood City and San Mateo along the CalTrain line.	The comment expresses an opinion about the provision of housing in the Specific Plan Update, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
B14-6	Millbrae simply does not have the landmass to incorporate any significant office or corporate presence besides some incidental use. It doesn't fit with the characteristic of our community to go overboard on that either. We should look to the Serra Properties plan as a better guide for the objective of	The comment expresses an opinion on the use of office and commercial space, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their

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	<p>the Millbrae Plan.</p> <p>Please consider my comments in your deliberations as I have participated at the majority of the public sessions.</p>	<p>consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B15	Holly Borghello	
B15-1	<p>Not that this will be taken seriously but I was told I could write in and state my opinion and suggestions.</p> <p>My suggestion is to leave things alone and build nothing!</p> <p>My opinion is Millbrae has become a hot bed of traffic, too many people with all the building going on and the downtown looks like hell. I moved in a bedroom community that was small, quaint and friendly. Now 30 years later it is crowded, ugly and not friendly. There are stores that have no one shopping in yet they are existing? What is that about? Millbrae has turned into a bit of a laughing stock amongst the other cities along the corridor. You get a snicker when you say Millbrae.</p> <p>Millbrae is no longer the Millbrae that any of my neighbors and friends remember or liked.</p>	<p>The comment expresses an opinion regarding future development on in the Specific Plan Area, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B16	John Roche	
B16-1	<p>I wanted to add my comments to the proposed development around the BART station or MSASP. I have heard a lot of talk with regard to expanding our tax base as a reason build. However, we have in the last 10 years added the condos on the corner of Millbrae and El Camino. More were added at the corner of Victoria and El Camino, another complex on the site where Wendy's once occupied and last the development at the north end of town.</p> <p>Prior to all of this development we were told that the expanded tax base as the answer to fiscal problems. Prior to this development we were told that the building of the Bart station was going to bring in more revenue and was needed to expand the tax base. You may be expanding the tax base but it is absorbed into</p>	<p>The comment expresses an opinion regarding future development on in the Specific Plan Area, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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	<p>infrastructure improvements, police fire and other city services expansion made necessary by the developments.</p>	
	<p>These items were also billed as in keeping with transit First policies which as of today have not materialized. Transit First is a work around for developers not providing parking for this development does the same. What we have received is what all the critics of these plans said - meaning more traffic, more crowding at our schools and more city services as a result. Show me where the city will get a net increase in revenues of a substantial amount and I would support this effort, however. it is a false premise.</p>	
	<p>We will get more traffic in the already ridiculously gridlocked area that includes El Camino Real all the way to the Bayshore and back. Other groups have painted a picture of bike lanes and gallerias and all sorts of wonderful things. Unfortunately this is nonsense. Are all the advocates of this plan including developers willing to put up a bond or sorts when this plan fails just like all of the other developments and reimburse the people of Millbrae. You are destroying a way of life. I did not move to Millbrae to have it become another overbuilt suburb. There is a reason these developments do not get built in Hillsboro or Atherton. They do not want their lifestyle and towns degraded. The difference the citizens of those towns have the money to fight it. We rely on our city council.</p>	
	<p>How can you in good conscience degrade the way of life of your friends and neighbors. The only beneficiaries are the developers.</p>	
	<p>We are not San Francisco and we will never be san Francisco despite the rhetoric. Btw if you have been to SF lately you cannot tell me that all of the development has been positive for the city. It has become an overcrowded, bumper to bumper mess. I never thought I would refer to SF as ugly and not a place to go.</p>	
	<p>Just look across the street from Bart and you see a few stores and the only</p>	

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	<p>people in the parking lots are Uber and Lyft drivers. I quit going to In and Out and the other stores because of the overcrowding. This is a bad plan for which no one will take responsibility once it is built and comes up short of its promises.</p> <p>Do not buy the argument that this is what people want - it is what they are given. Do not buy the argument that they will scale back a ridiculously overbuilt project so you agree to their original plan. This has been used on every project in Millbrae. People always say "well it's not as big as their original plan." This is a scare tactic. One former council member went so far as to say the project should be bigger, the size of Grand Central Station - the scare tactic at its worst-idiocy at best.</p> <p>Last, you owe it to the citizens of Millbrae not developers or Transit First advocacy groups from outside of Millbrae or to Bart. You owe it to us. If nothing else put it on the ballot. Else you are creating an environment that will continue to degrade the environment of Millbrae.</p>	
B17	Manito	
B17-1	<p>The plan also says Railroad Avenue will be designed for bicycle lanes but that's not possible given that the road will only be 24' wide. There is no room for bicycle lanes.</p> <p>There may be room if RR Avenue were made one-way but kept two-way for bicycle users.</p>	<p>The comment incorrectly describes the proposed bike facilities of the Specific Plan. The Specific Plan discusses bicycle lanes on California Drive, but it does not discuss bicycle lanes on Railroad Avenue. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B17-2	<p>The Study and EIR is sorely lacking documentation of how critical a bicycle route California Drive is to the study site. At one of the meetings that I attended, there was mention of California Dr and how challenging it was for bikes and pedestrians yet no plans were discussed in any of the documents, much less conceptualized.</p> <p>California Dr is a key regional bike connection as part of the San Mateo County</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. The Specific Plan includes bike lanes on California Drive. It does not include enhanced bicycle facilities on California Drive because California Drive has been identified as an alternate transit</p>

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	<p>North-South bicycle route. Locally it is used currently by bike-transit patrons to connect to Caltrain or BART. And yet the only "bicycle infrastructure" in place are painted bicycle sharrows that are sadly in the door zone. They were placed when there were lesser guidance on best practices of where they should be placed. And painting sharrows as the only bike treatment are not appropriate for streets like California Dr which has a 35 MPH speed limit. It is not safe now or for the future consider that as the permanent treatment.</p> <p>Fortunately streets like California Dr are not uncommon up and down the Peninsula with several streets flanking the Caltrain right-of-way. There are a number of Cities that have found a way to incorporate bike lanes on such streets. One such City is San Mateo and how it improved conditions for bicyclists on Pacific Boulevard, between Antioch and 42nd Avenue. Like California Dr, Pacific is 40' wide from curb to curb and has a 35 MPH speed limit. What San Mateo did is remove parking on the track side which enabled bicycle lanes to be painted in both direction – see here. This has resulted in narrowing the traffic lanes which benefited the fronting residences by giving them Traffic Calming benefits and buffers from high speed traffic. More recently San Mateo actually removed parking on both sides of Pacific Blve between 42nd Ave and the city border with Belmont and painted very safe and usable buffered bike lane – see here. You can see how they did that per the attached. They striped 10' traffic lanes, 3' buffers and 7' wide bicycle lanes. As you can see, we don't have to reinvent the wheel here as it has been done successfully here.</p> <p>Without bicycle improvements like this, then you can expect that people will continue to drive to the site. By doing bike lanes like these, you'd be encouraging the needed mode-shift away from driving and into other modes to mitigate traffic impacts. You would also not need as many parking spaces as a result.</p> <p>Finally, it should be said that the improvements suggested above can and should be implemented now and should not have to wait for the development of the parcels. There are a number of bicycle riders already who are challenged and put in harm's way by the current hostile design. Despite that, people do bike here</p>	<p>route for southbound SamTrans buses. This would allow transit riders to access Millbrae Station without crossing El Camino Real. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters..</p>

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	<p>even at great risk. We would be smart to make it safer for those riders now and take advantage and encourage more riding to the station today. Otherwise, it would be a self-fulfilling prophecy that traffic and parking will be a definite problem going forward. We have the opportunity to do things right and better now.</p>	
<p>Attachment B17-1</p>	<p>2014 Slurry Seal Project Pavement Striping Plans</p>	<p>The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project. The City has examined the attachment and concluded that it does not warrant any revisions to the EIR.</p>
<p>B18</p>	<p>John Muniz, President and Vernon W. Bruce, Train Museum Director, Millbrae Historical Society</p>	
<p>B18-1</p>	<p>Please be advised that our Train Museum has plans to lay track and operate a short tourist train within a small portion of the 'station-area specific' plan. This rail line would parallel the existing Caltrain tracks, and would be within the current Caltrain parking lot. It would also extend south, beyond the parking lot into Burlingame. This plan was approved by the Millbrae Historical Society Board of Trustees in 2003, and was submitted to the appropriate authorities at that time. Currently, the biggest issue delaying our construction of the line is the Caltrain plans to electrify the corridor. The area we would use is needed temporarily during construction of the electrification infrastructure.</p> <p>Thank you for your concern with this matter.</p>	<p>The comment provides information regarding a future project approved by the Historical Society Board of Trustees; however, no plans have been submitted to the City for consideration for project approval. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.</p>
<p>B19</p>	<p>Vincent A. Muzzi, Esq., 1818 Gilbreth Road, Suite 123, Burlingame, CA 94010</p>	
<p>B19-1</p>	<p>As instructed, attached is Millbrae Serra Station's 5 pages of comments on the Draft EIR for the Millbrae Station Area Plan. You will also be receiving some additional comments from some of our other consultants. We understand that certain parties have asked that today's submission date be postponed. We have not asked for any postponement, but wanted to avoid pre-submitting if a postponement was to be made by the City. Not having heard any report of postponement, as of the time of this email, we are submitting our comments today.</p> <p>Please advise me if there should be any problem with your receiving this email</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>

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	<p>and the attachment ASAP. I am in Italy and 9 time zones ahead trying to get this to you by 4:15 PM PDT on 8/10/2015.</p>	
	<p>You can call me on my cell, as a local call for you, simply by calling (650) 333-1358. Your call will be forwarded to my cell. An email from PlaceWorks or the City of Millbrae confirming timely receipt of the attached comments would be greatly appreciated.</p>	
B19-2	<p>Section 2, Page 22: Remove reference to "Weeks and Grimmer" from CULT TOD #1-1.</p>	<p>As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to include remove the reference to "Weeks and Grimmer." This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>
B19-3	<p>Section 2, Page 23: Height issue for TOD #1: We ask that the DEIR <u>THROUGH OUT</u> not precondition the City's existing authority to over-ride the Airport Compatibility Zone criteria, but instead provide that the Airport Compatibility Zone criteria will be applied subject to the City Council's right to override for a TOD, if the Council finds that the TOD project's building(s) heights and criteria have been applied for to the FAA and have been reviewed and approved by the FAA.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to describe that all development projects under the Specific Plan Update are subject to a compatibility and consistency determination with the SFO ALUCP, unless granted an exception by the FAA, SFO, and other responsible agencies. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>
	<p>Note: If as has been reported to us by the FAA there are only 00.6% of all flights per year over Site One for take-offs during the year, we are talking about a total of less than 13 recorded fly overs in any 12 month period. (See Section 4, Page 23 where it states SFO reports there are annually 4,206 total flights to and from SFO or 2,103 take-offs) of which 00.6% fly over Site One which we calculate at less than 13 flights per year.</p>	
B19-4	<p>Section 2, Page 27: If the City intends to pursue any traffic mitigations, how is developers' fair share to be addressed?</p>	<p>The developer's fair share would be calculated based on the amount of traffic added by the development, as a percentage of the increase in traffic from existing conditions.</p>
B19-5	<p>Section 3, Page 3: Don't you need to mention CalTrain electrification?</p>	<p>The Caltrain Electrification Program is discussed in Chapter 4.13, Transportation and Circulation, of the Draft EIR.</p>
B19-6	<p>Section 3, Page 13: Section 3.2.1.4 continued at the top of the page at the end of the second paragraph, add: "The City Council can override Airport Compatibility Zone criteria for a TOD in favor of FAA studied building specific height limit approvals."</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Response to Comment B19-3.</p>
B19-7	<p>Section 3, Figure 10: Change "**Heights must comply with San Francisco</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of</p>

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Number	Comment	Response
	International Airport Land Use Compatibility Plan." To: "Heights that comply with San Francisco International Airport Land Use Compatibility Plan." This describes what is shown on figure, but leaves open the right of the City Council to override for TOD in favor of FAA studied, building specific, height limit approvals.	the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Response to Comment B19-3.
B19-8	Section 3, Page 20: 1. Add Uses: Museum ("P"), Theater ("C") Co-Generation ("P") and Paid Public Parking ("P").	As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to include museum, theater, and cogeneration facilities at the TOD #1 project site. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR.
B19-9	2. Modify Notes and Footnotes a, c and d regarding Airport Compatibility Zone criteria to be "subject to permitted City Council override for TOD in favor of FAA studied, building specific, height limit approvals."	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Response to Comment B19-3.
B19-10	Section 3, Page 21: Table 3.2 Modify Note and footnotes a, c and d regarding Airport Compatibility Zone criteria to be "subject to permitted City Council override for TOD in favor of FAA studied, building specific, height limit approvals."	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Response to Comment B19-3.
B19-11	Section 3, Page 22: Modify the last sentence on this page to allow the City Council to override the San Francisco International Airport Land Use Compatibility Plan for TOD in favor of FAA studied, building specific, height limit approvals.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Response to Comment B19-3.
B19-12	Section 3, Page 22: Modify the last sentence on this page to allow the City Council to override the San Francisco International Airport Land Use Compatibility Plan for TOD in favor of FAA studied, building specific, height limit approvals.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Response to Comment B19-3.
B19-13	2. Modify: Height (Max.a/Min.b) to Height (Max.a/Min.)b to make clear footnote "b. Exception allowed for a signature building that is part of a larger development." applies to both maximum and minimum height. Otherwise, outside parentheses, it appears to apply only to minimum height.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to clarify footnote a. includes minor adjustments that pertain to building height increase within a maximum height range of 108 to 121 feet are also subject to compatibility and consistency determination with the Airport Land Use Compatibility Plan (ALUCP) and footnote b. allows for a development to propose to exceed the baseline maximum Residential Density up to the maximum shown on this line only through implementation of the Community Benefits Program. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR.
B19-14	3. Modify Setback under TOD rear setback to "0 feet" from sidewalk on new	The comment does not state a specific concern or question regarding the sufficiency of

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	extension of new California Drive street frontage since City has increased width of both that street and sidewalk for SamTrans.	the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to modify this sidewalk width from 12 feet to 10 feet. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
B19-15	4. TOD Maximum FAR and Residential Development Density: footnote “d. Floor Area Ratio (FAR): The ratio of the gross floor area of all buildings on a lot to the area of the lot.” Revised to read: “d. Floor Area Ratio (FAR): The ratio of the gross floor area of all buildings on a lot to the area of the lot including any area dedicated in a TOD to street right-of-way.” Parking is not of FAR.”	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to clarify the FAR. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR.
B19-16	5. TOD increase maximum permitted floor plate to 50,000 square feet is what technology companies are demanding.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to eliminate permitted floor plate standards. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
B19-17	6. Modify footnote “i” to make it clear that Building Floor Plate limitation does not apply to any TOD parking garage’s floor-plate(s).	See Response to Comment B19-16.
B19-18	Section 3, Page 26: Why are we setting arbitrary setback steps for the TOD#1 in the EIR? What reason is there for any step back for the TOD building(s) facing on the new extension of California Drive opposite the BART Station? Given the proposed reduction of the TOD#1 site to accommodate the widening of the California Drive extension, at least that face of the TOD should not require any predefined articulation. Building articulation can be best addressed for any aesthetic issues in planning commission and/or council design review.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to set street wall height limit at setback line has been increased to 100 feet. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
B19-19	Section 3, Page 28: “Setbacks Near Single Family Designations” requiring a 45 degree angle needs to be clarified. The word “designation” is ambiguous and should be changed to “zoned.” It also needs to be clarified that it does not apply to any zoned or permitted single family structures within the Station Area Plan. (Note: There is an existing single family, rented home at 133 Serra Avenue which will continue to be a permitted use under the Station Area overlay. We do not know its zoning status.)	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No changes to the Specific Plan or the EIR have been made related to this comment. The single-family residential (SFR) land use designation reference is to the legal non-conforming use of a SFR in a commercial zone. This SFR is not a residential (R1) zoned area, nor a residential neighborhood.
B19-20	Section 3, Page 28: Public Open Space should include the enclosed galleria which is planned to be open to the public during normal business hours to be	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment

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	decided at the time of	raise a new environmental issue. As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to show that the open space requirement has been reduced from 25 percent to 10 percent. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
B19-21	Section 3, Page 43: 1. Conditional Use Permits “CUP’s” should be added to list of approvals.	As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to include Conditional Use Permits (CUPs) as a required approval. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR.
B19-22	2. Other agency approvals should be listed: (consistent with list on Section 3, Page 61 and Section 3, Page 83.) However, it needs to be stated the City Council can override the San Francisco International Airport Land Use Compatibility Plan in favor of FAA studied, building specific, height limit approvals.	As discussed on page 3-43 of Chapter 3, Project Description, of the Draft EIR, the Specific Plan Update would be adopted solely by the Millbrae City Council. The Planning Commission and other decision-making bodies would review the proposed Specific Plan Update and make recommendations to City Council. While other agencies may be consulted during the adoption process, their approval is not required for the Specific Plan Update adoption. As discussed in Response to Comment A1-1, the City is currently in the process of having the Millbrae Station Area Specific Plan Update reviewed by the ALUC prior to adoption of the Specific Plan Update for a determination of consistency with the ALUCP. As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to clarify the ALUC’s role in the approval process. Also, see Response to Comment B19-3.
B19-23	Section 3, Figure 18: The TOD #1 outline shown on the drawing is incorrect in that it fails to include 190 El Camino Real within TOD #1.	As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to include this parcel. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR.
B19-24	Section 3, Page 45: In section 3.3.1.3 at the end of “TOD#1 Land Use Concept and Planning Zone,” However, it needs to be stated that City Council can override the San Francisco International Airport Land Use Compatibility Plan in favor of FAA studied, building specific, height limit approvals.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Response to Comment B19-3.
B19-25	Section 3, Page 54 Retail is limited from 8 AM to 5 PM. This is not consistent with TOD and needs to be expanded to at least comply with BART and CalTrain hours, if not longer.	As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to clarify the hours of operation. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR.
B19-26	Section 3, Page 57: 1. Bike storage is excessive in the full build-out of only site 1, 5 & 6 would require long term bike parking for over 1,000 bicycles! We would suggest that the number be related to the number of required parking such as 10% of the number of parking spaces required.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. The bicycle parking

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B19-27	2. We would propose that long-term bike parking be made flexible as to how it is accommodated and to be counted and permitted to be included within units or other designated areas in residential and office units themselves.	described in the Draft EIR is consistent with the bicycle parking standards of the proposed Specific Plan Update. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Response to Comment B19-26.
B19-28	Section 3, Page 60: Utilities discussion omits sewer service.	The sewer discussion is included under the subheading “Wastewater” on page 60 in Chapter 3, Project Description, of the Draft EIR.
B19-29	Section 3, Page 61: The list needs to be made consistent with Section 3, page 43 and Section 3, page 83.	As shown in Chapter 3 of this Final EIR, the required approvals list in the Draft EIR has been revised. However, the three lists for the Specific Plan Update, TOD #1, and TOD #2 projects are not exactly identical; therefore, this change requested by the commenter has not been made. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR.
B19-30	Section 3, Page 66: At the end of section 3.4.4.1 “Building Design and Height” with reference to TOD #1 it needs to be stated that City Council can override the San Francisco International Airport Land Use Compatibility Plan in favor of FAA studied, building specific, height limit approvals.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Response to Comment B19-3.
B19-31	Section 4.4, Page 11: Remove reference to “Weeks and Grimmer” from CULT TOD #1-1.	As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to include remove the reference to “Weeks and Grimmer.” These revisions do not affect any conclusions or significance determinations provided in the Draft EIR.
B19-32	Section 4.8, Page 22: Sea level rise discussion is missing an impact conclusion.	As discussed in Chapter 4.8, Hydrology and Water Quality, on page 4.8-22, The San Francisco Bay Conservation and Development Commission (BCDC) has jurisdiction to regulate new development within 100 feet inland from the Bay shoreline and the Specific Plan Area is more than 100 feet from the Bay shoreline at its nearest location. While the Pacific Institute has produced sea level rise scenario maps for long range planning and as shown on Figure 4.8-7, most of the Specific Plan Area north of El Camino Real is susceptible to the projected sea level rise of 55 inches by 2100, as discussed on the BCDC’s “New Sea Level Rise Policies Fact Sheet,” sea level rise risk assessments are not required for repairs of existing facilities, interim projects, and small projects that do not increase risks to public safety, and infill projects within existing urbanized areas. Sea level risk assessments are only required within BCDC’s jurisdiction, and for projects located only in the shoreline band, an area within 100 feet of the shoreline, need only address risks to public access. The proposed Project

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Number	Comment	Response
B19-33	Section 4.9, Page 16: How is LU4.1 Commercial and Industrial Needs not applicable to TOD #1?	<p>encourages resilient development and reduces carbon emissions by locating jobs and housing near public transportation, which according to BCDC, outweigh the risk from flooding.</p> <p>The existing policy LU4.1, requires the City not individual projects to provide sufficient land for commercial and industrial uses to allow for development that provides basic goods and services to Millbrae residents and surrounding regional economic activities such as the San Francisco International Airport. Since the TOD #1 and TOD#2 projects would provide commercial land uses, they would also be consistent with this policy. As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to include this consistency analysis. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>
B19-34	Section 4.9, Page 18: FAR typo: shown as 4.75, please correct to show 5.75.	As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to correct the reference. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR.
B19-35	Section 4.10, Page 26: Last paragraph should say, "Standard of Significance 6" (not "5") and "aviation facilities" should be replaced by "private airstrips."	As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to correct the reference. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR.
B19-36	Section 4.10, Page 31: 1. Second to last sentence under "Summary" needs an ending.	As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to include a summary. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR.
B19-37	2. Under TOD #1 Project, first sentence should state the "interior residential uses" would be required to stay under 45dBA.	As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to correct the reference to interior residential uses. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR.
B19-38	Section 4.10, Page 40: At top of page, TOD #1 should be #2 and MM should be 1-2.2.	As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to correct the reference to the TOD #1 project. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
B19-39	Section 4.10, Page 72: In the second sentence use "would" not "could."	As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to correct the reference. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR.
B19-40	Section 4.12, Page 23: Was a Developer Fee Study approved? If so, this section could be updated.	According to the San Mateo Union High School District the new developer impact fees listed in Chapter 4.10, Public Services and Recreation, of the Draft EIR on page 4.12-23 are current.

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Number	Comment	Response
B19-41	Section 4.13, Page 28: 1. SamTrans: The southbound SamTrans Bus stop would be more practically located on California Drive under or just north of the Millbrae Avenue overpass as we have shown in our drawings for TOD #1. The road width can be achieved in those areas without eroding any of the TOD #1 building area or over extending any overhead bridging of the new California Drive extension to the BART station platform. What are you going to do with the Hexagon study?	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. One of the goals of the Specific Plan is to locate bus stops as close to the Station entrances as possible. The locations identified by the commenter do not meet this goal. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
B19-42	2. Shuttle stops: The west side bus loop has 3 shuttles: Mercy High School, Broadway-Millbrae CalTrain and North Burlingame Alliance shuttle. They service the CalTrain station as well as BART. I would be most convenient to locate those closer to the train station. Why would you put the bus pullouts for 4 large shuttles at the new California extension? What are you going to do with the Hexagon study?	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. One of the goals of the Specific Plan is to locate bus stops as close to the Station entrances as possible. The locations identified by the commenter do not meet this goal. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
B19-43	Section 4.13, Page 42: The parenthetical convention used throughout the Traffic section is confusing and unnecessary (e.g. Existing (2014) Plus Project (Specific Plan Update condition)). It should just match the Analysis Scenarios in Section 4 pages 13-16.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. This naming convention was selected to discern the analysis years and when the "project" refers to the Specific Plan, TOD#1, or TOD#2. No changes to the naming convention applied to the Draft EIR have been revised as a result of this comment.
B19-44	Section 5.2, Page 5: Table 5.2.2 shows in the "No Project" alternative 500 hotel rooms instead of 500 Residential (Units).	As shown in the Community Design Element in the current 1998 Specific Plan on Figure 31, Illustrative Plan, West of Station (sites 1 & 2) on page 19, the TOD #1 site one include hotel and retail land uses only.
B19-45	1. At Section 5.2, pages 11-12 it states that the No Project alternative does not have any Airport Related Hazards. However, one of the policies in the Airport's list is that no gathering areas for more than 300 persons should be permitted. A 500 room hotel would certainly require gathering areas, conference rooms, ball rooms that would accommodate 300 or more persons to be economically viable.	As shown in Table 4.7-2, Safety Compatibility Criteria, in Chapter 4.7, Hazards and Hazardous Materials, a theater, meeting hall, and places of assembly seating more than 300 people are considered incompatible uses. The hotel associated with the proposed Project are not intended to be large conference facilities with meeting rooms that could accommodate a gathering of 300 people or more. As shown in Chapter 3 of this Final EIR, the Draft EIR has been revised to clarify the intent of the type of hotel permitted under the No Project scenario. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.

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B19-46	2. The No Project alternative would leave the existing Millbrae Serra Convalescent Hospital to continue its existing operations in conflict with the Airport’s policy against such use in this location.	The No Project Alternative in the Draft EIR does not assume a No Project-No Build scenario, but rather as described in Chapter 5.2, Alternatives to the Proposed TOD #1 Project, on page 5.2-6, under the No Project Alternative, the proposed TOD #1 project would not be approved, and the TOD #1 project site would be developed consistent with the 1998 Millbrae Station Area Specific Plan as amended by the City Council in 2002.
B19-47	Again, we urge that the EIR let the City Council determine what Airport policies it will and will not accept for the Station Area provided they are fact based on FAA guidelines, study and specific approved building and use applications that have been or are approved by the FAA.	The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
B20	Adina Levin, Director, Friends of Caltrain	
B20-1	<p>Friends of Caltrain is a 501c3 non-profit with over 5000 participants on the Peninsula corridor from San Francisco through San Jose, supporting an integrated transit system with stable funding and transit-supportive policies.</p> <p>To further the goal sustainable transportation and transit-supportive land use would like to provide comments on the Millbrae Station Area Specific Plan (MSASP) and Draft Environmental Impact Report (DEIR), which includes two transit-oriented developments.</p> <p>The proposed update to the MSASP presents a unique opportunity to transform the Millbrae station area into a vibrant, mixed-use, transit-oriented, and economically resilient neighborhood. It is classified as a Priority Development Area in the One Bay Area Plan as a critical part of the sets greenhouse gas reduction goals through the Bay Area Air Quality Management District [BAAQMD] using transportation and housing strategies</p>	The comment serves as an opening remark and introduces the comments that follow. It does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
B20-2	The DEIR should include a strong focus on Vehicle Miles Traveled as a core measure to evaluate the environmental impact of transportation in the Plan Area in line with the objective of State Senate Bill 743. The environmental analysis must be primarily evaluative to its promotion of "the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses."	See Response to Comment A6-6.

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B20-3	<p>The MSASP should set transportation goals that support statewide carbon reduction goals as established in AB 32, the Global Warming Solutions Act of 2006, which set greenhouse gas emissions reductions targets for 2020 and SB 375, the Sustainable Communities and Climate Protection Act of 2008.</p> <p>As one of the most transit-rich locations in the region, the Millbrae station is particularly appropriate for strategies to reduce VMT and single-occupancy vehicle trips while increasing active transportation options through public transit, bicycling, and walking.</p> <p>Currently the draft plan forecasts a driving mode share of 69% for an area with robust rail and bus transit. This mode share is much higher than other areas with less robust transit connections including Mountain View North Bayshore (where Council set a goal of 45% drivealone mode share based on robust planning and Menlo Park near Facebook (where the draft General Plan circulation goals call for under 50% drivealone). Technology companies in Downtown Palo Alto near Caltrain report mode share of less than 40% drivealone.</p> <p>The Plan should propose and the EIR should study a stronger goal of 45% drivealone mode share, and the City should bring in advisors with professional expertise to assess an appropriate, achievable, and ambitious goal that would help address the local traffic concerns and advance climate goals.</p> <p>In particular, the MSASP forecasts that bike and pedestrian trips in 2040 will remain at current levels of 3%. We urge Millbrae to set much higher goals for this transit hub, at least 20%, and ensure that infrastructure and encouragement programs are in place to reach these goals. This will also help reduce car traffic and congestion for the city. To further this goal, the MSASP and DEIR should update the bicycle standards to include class IV protected bikeways, which were created in California by AB 1193 in September 2014. Protected bikeways are cycle tracks or separated bikeways, and exact specifications will be published by January 1, 2016.</p> <p>In order to achieve the VMT/mode share goals, a best practice as followed by other cities in the area is to assign each development a trip goal with monitoring</p>	<p>The comment expresses the opinions of the commenter and includes recommendations regarding multi-modal transportation. It does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The forecasted driving mode share does not represent a drive alone goal. It is the projected driving mode share based on the mix of land uses and (primarily) on the available public transit services. The trips made among the uses within the Specific Plan Area will include higher mode shares of walking and biking trips that are not reflected in the driving mode percentage. In addition, the Specific Plan includes Transportation Demand Management (TDM) strategies to reduce the drive alone percentages. The locations cited in the comment have high concentrations of high-tech companies that have the financial resources to provide private shuttle buses to make major reductions in drive alone mode shares. Therefore, they are not analogous to the Millbrae Station area. The reported bike share is also not a goal. Biking is encouraged through the addition of Bay Trail connections, a multi-use facility on the north side of Millbrae Avenue, bike lanes, bike routes, and bicycle parking. Class IV bicycle facilities have not yet been adopted by Caltrans. The City has not assigned each development a trip goal at this time as the only proposed development are located adjacent to the Station, which provides the best opportunity to reduce vehicle trips. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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	<p>and public reporting, so as to achieve the overall goal across the set of developments in the plan area.</p> <p>In order to achieve effective vehicle trip reduction for multi-tenant developments (with residential buildings and with smaller tenants who cannot each afford a TDM program, their own shuttles, etc), Millbrae may wish to consider a Transportation Management Association, such as is being used by other cities - Mountain View, Sunnyvale, San Mateo- that has the capacity and authority to execute a Transportation Demand Management Plan effectively for both new and existing businesses and housing developments. Developer fees could fund the TMA which would design and operate programs for multiple tenants.</p>	
B20-4	<p>Another strongly effective policy in transit-rich areas is to “right-size” parking so as to support reasonable expected use by drivers but not overly encourage vehicle trips. According to the draft plan, TOD #2 (Republic) provides slightly more than one parking space per two office workers, and slightly more than one space per bedroom plus guest parking. However, the dedicated retail parking includes 4 spaces per thousand square feet, and does not have any obvious sharing among uses that have different peak hours. Plus, there are over 609 surface parking spaces, above and beyond the parking dedicated for office, retail, and residential use. 317 of those parking spaces would be for BART parking, with nearly 300 additional surface parking spaces. These additional parking spaces seem at cross purposes with the goals of a transit-oriented development to encourage multi-modal access, and at odds with a set of policies in the plan to encourage shared parking, and priced parking, to encourage efficient use of parking space.</p> <p>The DEIR describes the additional surface parking in a positive manner as a positive “less than significant impact. This language is in keeping with older CEQA guidelines, where “inadequate parking” was considered an environmental impact. However, “sufficient parking” is no longer considered an impact under CEQA, so this consideration is no longer appropriate for CEQA analysis.</p> <p>In order to efficiently use parking and balance incentives to reduce vehicle trips, we recommend that parking be entirely unbundled so that users pay to park</p>	<p>The Draft EIR identifies the number of parking spaces for the TOD #2 project based on the proposed Specific Plan rates and compares them to the proposed parking supply on page 4.13-24 in Chapter 4.13, Transportation and Circulation. The TOD #2 project would result in a net reduction of 566 BART parking spaces. (The 609 surface spaces are part of the existing BART parking supply.) Parking impacts are still addressed under CEQA if an inadequate parking supply would result in the need to construct additional parking spaces or excessive vehicle circulation. Unbundled parking and Residential Permit parking programs are addressed on page 7.11 of the Specific Plan. A separate study was recently completed for the City to address Station access on the eastside (i.e. TOD #2 project site). See the Draft Millbrae Station Access Improvement Plan submitted to the City on August 26, 2015 for an assessment of the BART portion of the Station.</p>

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	<p>throughout the MSASP area. Unbundled parking pertains both to residential developments, where residents can purchase parking based on their household's needs, and for commercial developments. Unbundling parking in commercial developments and allowing the parking to be a separate line item in the lease allows employers use parking cash-out-employees who choose not to take a parking space because they commute via other modes can receive a cash benefit up to the value of the parking spot lease. The use of carshare spaces and carshare membership can help residents and workers to have access to cars as needed.</p> <p>Community members have reasonable concerns about preventing spillover parking into the neighborhoods. In order to prevent this impact, we recommend expanding Residential Parking Permit zones to cover neighborhood streets near the development. The RPP program would issue permits at low cost or no charge to residents, with permits available for guests. Residents of nearby new housing within the plan area would be ineligible for street permits. To prevent spillover parking from commercial use, the City can decide whether to provide no parking at all, short-term parking, and/or a limited number of parking permits for visitors and workers.</p> <p>In addition, in order to reduce the risk of spillover parking from transit users, Millbrae should partner with Caltrain, BART and SamTrans to conduct a station access study, in keeping with the goals of the transit agencies to reduce transit access by driving, improving pedestrian and bicycle access, and improving first/last mile connections to the station.</p>	
B20-5	<p>In order to further the VMT reduction goals the plan should consider substantial improvements to pedestrian and bicycle circulation especially along major gateway streets like El Camino Real and Millbrae Avenue. Proposed mitigation to the above-listed significant unavoidable impacts revolve almost exclusively around lane additions and widening of existing roads to facilitate motorized travel. Currently, improvements to bicycle circulation, these are all almost all confined to the small interior streets and a connection to the planned Bay Trail.</p> <p>This approach to transportation design conflicts with multiple objectives in the</p>	See Responses to Comments A13-17 and A13-18.

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	<p>Draft EIR (P. 3-40) that promote the development of Complete Streets within the entire specific plan area. As noted in the Draft EIR, El Camino Real and Millbrae Avenue provide the most direct north- south and east-west connecting routes respectively, to the BART/Caltrain Station and to the specific plan area in general. A review of traffic facilities by the Center for Investigative Reporting found that El Camino Real is the deadliest street in the San Francisco Bay Area and the section in Millbrae leads in the number of fatalities. The proposed addition of lanes to El-Camino Real/Millbrae Avenue intersection will further increase the risk of collisions especially involving pedestrians and bicyclists in this area. This is contradictory to the Complete Streets goals of the Plan.</p> <p>Concerns have been raised that El Camino Real has too much vehicle use to consider for bicycle and pedestrian improvements. However, research shows that El Camino Real in Millbrae has less vehicle traffic than ECR in other cities in the region that have adopted policies or are considering policies to implement bicycle and pedestrian improvements for El Camino Real.</p> <p>If improvements for active transportation is deemed to require more analysis and decision-making engagement than is feasible as part of the Millbrae Station Area Specific Plan, then we recommend that the City Council commission a study of the El Camino Real and Millbrae Corridors to determine appropriate improvements for bicycle and pedestrian access and safety, potentially in partnership with neighboring cities Burlingame and San Bruno. Study would benefit from considering the impacts/benefits on the local economy from improved pedestrian and bicycle access.</p> <p>Potential improvements to consider include, but are not limited to, the following major elements:</p> <ol style="list-style-type: none"> 1. Narrowing of El Camino Real into a 2-lane roadway in each direction 2. Addition of a Class IV protected bicycle lane in each direction of El Camino Real 3. Addition of a Class II bicycle lane in each direction of Millbrae Avenue 4. Improve pedestrian crosswalks with bulbouts to reduce the number of lanes 	

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	<p>crossed and a safe haven at the middle of the street</p> <p>5. Improved sidewalks along El Camino to take an increased volume of pedestrian traffic in greater comfort and safety along a mixed use corridor with improved transit.</p>	
B20-6	<p>Given its location at a major transit hub, we strongly support the city's goals for mixed use development in the station area. We hope that these comments can be constructive toward the goals of reducing transportation impacts and helping the development in the area to foster improvement to Millbrae's economy, the quality of life of Millbrae residents, and the environment.</p> <p>Thank you for your consideration</p>	<p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
B21	Gladwyn d'Souza, Chair, Transportation Committee, Gita Dev, Co-Chair, Sustainable Land Use Committee, Sierra Club Loma Prieta Chapter	
B21-1	<p>The proposed update to the MSASP presents a unique opportunity to transform the Millbrae station area into a vibrant, mixed-use, transit-oriented, and economically resilient neighborhood. It is classified as a Priority Development Area in the One Bay Area Plan as a critical part of the Bay Area wide solution to meet AB 32, California's Global Warming Act of 2006 and SB 375 that sets greenhouse gas reduction goals through the Bay Area Air Quality Management District [BAAQMD] using transportation and housing strategies.</p> <p>For this reason, the Sierra Club offers the following comments on the draft EIR issued for the proposed MSASP Update. We hope that our comments will persuade the City of Millbrae to reevaluate the draft EIR for its adequacy, as well as the proposed MSASP Update for its conformance to the above laws and relevance in today's social, environmental and economic climate.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
B21-2	<p><u>Air Quality</u> The Draft EIR informs that the proposed buildout of the Specific Plan Area, TOD # 1, and TOD #2 would individually and collectively result in <u>significant unavoidable impact</u> to air quality in Millbrae. Specifically, the proposed actions would individually and collectively <u>increase operational phase emissions beyond significance thresholds established by the BAAQMD for VOCs [volatile organic compounds] and NOx [nitrogen oxides], as well as exceed the projected growth increase for Millbrae and thus exceed BAAQMD's regional significance thresholds</u></p>	<p>The Commenter is correct that the EIR identifies a significant unavoidable impact for regional air quality impacts from Project operations and would exceed the anticipated growth increase for the City identified by the Association of Bay Area Governments (ABAG). Impact AQ-2 in Chapter 4.2, Air Quality, identified that criteria air pollutant emissions generated by the proposed Plan would exceed the Bay Area Air Quality Management District's (BAAQMD) significance thresholds for VOC during Project operations.</p>

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	<u>for air pollutants.</u>	
B21-3	<p>First, we must point out that it has been clearly established that motor vehicles are the primary source of NOX and VOC emissions, and these emissions increase in direct proportionality to VMT [vehicle miles traveled]. Therefore, a <u>95% increase in total daily VMT, even when accompanied by a 75% reduction in VMT per capita</u> (as stated in the Draft EIR) does not mitigate but rather magnifies the threat posed by air pollution to the health of current and future Millbrae residents and the Bay Area.</p>	<p>The commenter states that the increase in vehicle miles traveled (VMT) generated by the Project contributes to air pollution and its associated health-related effects in the Bay Area. As demonstrated by the CalEEMod emissions model runs for the proposed Plan in Table 4.2-9 for the proposed Plan, the primary sources of NOx and particulate matter (PM₁₀ and PM_{2.5}) emissions is from an increase in VMT related to mobile sources while the primary sources of VOC emissions is from the use of consumer products (areas sources); however mobile sources also contribute to the VOC emissions exceedance.</p>
B21-4	<p>Secondly, with regards to significant emissions of PM_{2.5} we urge the City to consider the fact that SFBAAB [San Francisco Bay Area Air Basin] which includes San Mateo County, is currently a <u>designated nonattainment area for ozone and PM_{2.5}</u>. As a result, additional unmitigated emission of PM_{2.5} resulting from the proposed buildout of the specific plan area and TOD #1 and TOD #2 respectively, would further deteriorate local and regional air quality and increase health risk to sensitive receptors in the area.</p>	<p>Impact AQ-3 and Impact AQ-6 in Chapter 4.2, Air Quality, identified that the San Francisco Bay Area Air Basin is currently designated a nonattainment area for California and National O₃, California and National PM_{2.5}, and California PM₁₀ Ambient Air Quality Standards (AAQS). The AAQS are standards that are based on levels of exposure that are determined to not result in adverse health. Consequently, projects that exceed BAAQMD's significance thresholds cumulatively contribute to health impacts within the SFBAAB. As identified in the EIR, known health effects related to ozone include worsening of bronchitis, asthma, and emphysema and a decrease in lung function. Particulate matter can also lead to a variety of health effects in people. These include premature death of people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, decreased lung function, and increased respiratory symptoms. Regional emissions contribute to these known health effects but it is speculative for this broad based Plan to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment since mass emissions are not correlated with concentrations of emissions or how many additional individuals in the air basin would be affected by the health effects cited above. The BAAQMD is the primary agency responsible for ensuring the health and welfare of sensitive individuals to elevated concentrations of air quality in the Air Basin. To achieve the health-based standards established by the US EPA, BAAQMD prepares an air quality management plan that detail regional programs to attain the AAQS. AQ-4 identifies mitigation to ensure that individual projects meet BAAQMD's performance standards (ten in one million [10E-06] cancer risk, PM_{2.5} concentrations exceed 0.3 µg/m³, or the appropriate noncancer hazard index exceeds 1.0) to reduce localized impact at nearby sensitive receptors in the Plan area to less than significant levels. However, as identified in</p>

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Number	Comment	Response
B21-5	<p><u>Currently, in Millbrae, cardiovascular events, chronic lower respiratory disease and lung cancer, are among the top 5 leading causes of death</u> for residents; and scientific studies by reputable organizations including the American Heart Association, World Health Organization, and The International Agency for Research on Cancer, have established a causal relationship between these diseases, and both short and long term exposure to air pollution.</p>	<p>Impact AQ-3 and Impact AQ-6, because the proposed Plan would exceed the BAAQMD significance thresholds, cumulative air quality impacts were considered significant and unavoidable.</p> <p>See Response to Comment B21-4.</p>
B21-6	<p>To protect the health of Millbrae residents, who are already significantly burdened by poor air quality, it is clearly imperative that the City incorporate into the EIR, a more robust transportation demand management plan, if it is serious about a mitigation strategy for air pollution. <u>This transportation demand management plan must prioritize and achieve transit, pedestrian and bicycle travel, safety, and connectivity, above cars. using clearly stated and measurable goals for shifting the mode share, and a pro-active program for meeting these goals. These are all currently missing in the proposed MSASP update and associated EIR¹.</u></p> <p>Footnote 1: This may warrant instituting a Transportation Management Association, such as is being used by other cities -Mountain View, Sunnyvale, Emeryville, San Mateo- that has the capacity and authority to execute a Transportation Demand Management Plan effectively for both new and existing businesses and housing developments.</p>	<p>The commenter requests that the EIR include a more robust transportation demand management (TDM) plan to shift mode share by prioritizing transit, pedestrian, and bicycle travel and safety but does not identify any additional specificity on what a more robust plan would be comprised of. The proposed Project includes TDM strategies including widening sidewalks, enhancing pedestrian crossings, installing separated bicycle lanes and parking facilities, accommodating of a bus rapid transit-style service, encouraging of shared parking measures, and includes policies related to alternative modes of transportation. As identified in Chapter 4.13, Transportation and Circulation, Policy P-CP 23 requires Plan Area employers to prepare TDM Plans that include measures to increase the number of employees walking, biking, using transit, or ridesharing (using carpools and vanpools) as commute modes and to reduce vehicle congestion. Where future projects have the potential to impact facilities under the Congestion Management Plan, the proposed Plan requires that the TDM Plan meet the current City/County Association of Governments of San Mateo County (C/CAG) requirements to reduce the number of trips on the CMP roadway network be approved by both the City and C/CAG. Furthermore, BAAQMD's Commuter Benefits Program (BAAQMD Regulation 14, Rule 1) requires all employers with 50 or more full - time employees to offer employer-based TDM programs to their employees and register with BAAQMD. Because the proposed Plan already requires preparation future development to prepare a TDM plan, a separate mitigation measures requiring preparation of TDM plans is not warranted.</p>
B21-7	<p><u>Greenhouse Gas Emissions¹</u> SB 375, the Sustainable Communities and Climate Protection Act of 2008 was intended to reduce GHG emissions by aligning regional long-range transportation</p>	<p>The comment outlines the requirements of Senate Bill 375 (SB 375) and the per capita passenger vehicle GHG reduction target for 2035 for the Bay Area, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation</p>

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Number	Comment	Response
	<p>plans, investments and housing allocations, with local land use planning to reduce VMT and vehicle trips. The Metropolitan Transportation Commission [MTC] has a target. 15% per capita GHG (15 MMTCO₂e) emissions reduction for light duty trucks and passenger vehicles from 2005 levels by 2035.</p> <p>Footnote 1: This may warrant instituting a Transportation Management Association, such as is being used by other cities -Mountain View, Sunnyvale, Emeryville, San Mateo- that has the capacity and authority to execute a Transportation Demand Management Plan effectively for both new and existing businesses and housing developments.</p>	<p>measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B21-8	<p>According to the Draft EIR, the per capita efficiency target for the proposed specific plan area update, TOD #1, and TOD #2, are all below the 4.6 MTCO₂e BAAQMD threshold. However, <u>buildout emissions for each, exceed the 1,100 MTCO₂e bright-line threshold of the BAAQMD.</u> The Draft EIR further categorizes the greenhouse gas impacts of the proposed specific plan update and TOD #1 and TOD #2, as less than significant without mitigation.</p> <p>The fact that projected GHG emissions in the plan, would only comply with BAAQMD per capita GHG emissions threshold, and not with the BAAQMD bright-line emission (total emission) threshold, is grounds for a mitigation strategy. <u>The EIR needs evaluate what alternatives can be enabled in the MSASP update to curb greenhouse gas emissions and meet targets of the Climate Action Plan.</u></p>	<p>Chapter 4.6, Greenhouse Gas Emissions, identifies project-level impacts associated with buildout of the individual projects (TOD# 1 and TOD#2), which would be operational by year 2020, and plan-level impacts associated with full buildout of the proposed Plan, which would occur over a longer buildout horizon in 2035. The Commenter incorrectly states that because GHG emissions of the individual TOD projects exceed 1,100 metric tons of carbon dioxide-equivalent (MTCO₂e) that the project-level impacts are significant. BAAQMD's CEQA Guidelines expressly states that lead agencies can use either the bright-line significance threshold of 1,100 MTCO₂e per year "OR" the efficiency metric of 4.6 MTCO₂e per service population per year. Chapter 4.6 identifies the significance criteria used by the City of Millbrae for the proposed Project (see page 4.6-20). As identified in Impact GHG-1, GHG emissions do not exceed the BAAQMD efficiency metric; and therefore, project-level and plan-level impacts were considered less than significant. No significant GHG emissions impacts were identified; and therefore, mitigation measures and alternatives to reduce impacts are not warranted.</p>
B21-9	<p><u>Transportation and Circulation</u> Under CEQA, a proposed project would have a significant impact on transportation and circulation if it would: 1. "Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system <u>taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrians and bicycle paths, and</u></p>	<p>The comment introduces the comments that follow; no further response is required.</p>

COMMENTS AND RESPONSES

TABLE 5-1 RESPONSE TO COMMENTS MATRIX

Number	Comment	Response
	<p>mass transit. 2. "Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections..."</p> <p>The draft EIR highlights that the proposed buildout of the specific plan area would:</p> <ul style="list-style-type: none"> • Add considerable volume of traffic to intersection #4 El Camino Real/Millbrae Avenue • Contribute a considerable level of traffic to intersection #5 El Camino Real/Murchison Drive • Contribute considerable levels of traffic to intersection #7 California Drive/Murchison Drive • Contribute considerable levels of traffic to intersection #8 Rollins Road/Millbrae Avenue. 	
B21-10	<p>Proposed mitigation to the above-listed significant unavoidable impacts revolve almost exclusively around <u>lane additions and widening of existing roads to facilitate motorized travel</u>. While there are a few proposed improvements to bicycle circulation, these are all confined to <u>the small interior streets and a connection to the planned Bay Trail</u>.</p>	See Responses to Comments A13-17 and A13-18.
B21-11	<p>This approach to transportation design conflicts, distinctly, with at least four objectives in the Draft EIR (P. 3-40) that promote the development of <u>Complete Streets</u> within the entire specific plan area. It is vitally important that equal access and safety is available to pedestrians and bicycles especially along major gateway streets like El Camino Real and Millbrae Avenue. As noted in the Draft EIR, El Camino Real and Millbrae Avenue provide the <u>most direct north-south and east-west connecting routes respectively, to the BART/Caltrain Station and to the specific plan area in general</u>. It therefore begs the question why, besides the proposed few traffic signal improvements, there are no meaningful improvements to pedestrian and bicycle circulation along these major direct gateway routes. As important as El Camino Real and Millbrae Avenue are to vehicular and non-vehicular travel, lack of safety deter their use by the latter group. A review of traffic facilities by the Center for Investigative Reporting found that <u>El Camino Real is the deadliest street in the San Francisco Bay Area and the section in</u></p>	See Responses to Comments A13-17 and A13-18.

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TABLE 5-1 RESPONSE TO COMMENTS MATRIX

Number	Comment	Response
	<u>Millbrae leads in the number of fatalities. The proposed addition of lanes to El Camino Real/Millbrae Avenue intersection will further increase the risk of accidents especially involving pedestrians and bicyclists in this area.</u> This is unacceptable.	
B21-12	The Sierra Club suggests that the City <u>revise the Draft EIR to consider the safety and efficiency of alternative modes of travel along the major streets and intersections.</u> Regulatory policies that must be considered in the analysis of <u>every street intersection</u> in the MSASP include:	<p>The comment requests revisions to the Draft EIR. The comment introduces a list of regulatory standards identified by Caltrans and the State of California. The City would need to adopt these standards prior to them being used as new significance criteria for the EIR. The EIR addresses impacts to all modes and address safety impacts based on the Standards of Significance in Section 4.13.1.4 of Chapter 4.13, Transportation and Circulation, of the Draft EIR, per CEQA requirements.</p> <p>The following safety-related significance criteria from CEQA Appendix G are referenced in the EIR:</p> <p>4. Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment).</p> <p>6. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.</p> <p>The following additional safety-related significance criteria are referenced in the EIR, specifically pertaining to transit, pedestrian and bicycle transportation:</p> <ul style="list-style-type: none"> -Reduce access to transit service or create unsafe access for transit passengers. -Cause pedestrian, transit, and/or bicycle facilities to be frequently blocked by cars or other potential safety obstructions/hazards. No significant safety impacts to these items were found. Therefore safety concerns contained in the comment have been addressed in the Draft EIR.
B21-13	• Caltrans Deputy Directive 64 (consider needs of non-motorized travelers),	See Response to Comment B21-12.
B21-14	• Caltrans Deputy Directive 64-RI (provide for needs of travelers of all ages and abilities)	See Response to Comment B21-12.
B21-15	• Caltrans Director's Policy 22 (accommodate needs of pedestrians and bicyclists),	See Response to Comment B21-12.
B21-16	• California Complete Streets Act of 2008 (AB 1358),	See Response to Comment B21-12.

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Number	Comment	Response
B21-17	• Senate Bill 743 (which is intended to negate LOS as a measurement in EIRs),	See Response to Comment B21-12.
B21-18	• MTC Regional Regulations (that promote complete streets),	See Response to Comment B21-12.
B21-19	• Millbrae Policy C1.3 (promote safe walking),	See Response to Comment B21-12.
B21-20	• Millbrae Policy C1.8 (promote bikeway and pedestrian improvements),	See Response to Comment B21-12.
B21-21	• Millbrae Policy C3.1 (separate regional and commuter traffic from local traffic),	See Response to Comment B21-12.
B21-22	• Millbrae Policy C4.9 (provide a safe and logical bikeway system),	See Response to Comment B21-12.
B21-23	• Millbrae Policy C4.15 (pedestrian safety and convenience to be considered in the design of intersections), etc.	See Response to Comment B21-12.
B21-24	We propose a more robust mitigation to transportation and circulation impacts resulting from the proposed buildout of the specific plan area especially since current circulation patterns do not relieve congestion by enabling other modes. Our mitigation strategy, which is in consonance with relevant regulatory policies, Caltrans revised guidelines that allows LOS [level of service] to be disregarded in Priority Development Areas favoring pedestrians and bicycles, meets all the stated objectives of the MSASP Update, and is highly feasible. It includes, but is not limited to, the following major elements:	The comment introduces additional suggested mitigation measures to be included in the Draft EIR. Responses to these suggestions are provided in the responses that follow.
B21-25	1. <u>Narrowing of El Camino Real into a 2-lane roadway in each direction</u>	See Responses to Comments A13-17 and A13-18.
B21-26	2. <u>Addition of a Class IV protected bicycle lane in each direction of El Camino Real</u>	See Responses to Comments A13-17 and A13-18.
B21-27	3. <u>Addition of a Class II bicycle lane in each direction of Millbrae Avenue</u>	The Specific Plan includes a future multi-use path on the north side of Millbrae Avenue, which would help address pedestrian and bicycle safety and comfort concerns on Millbrae Avenue.
B21-28	4. <u>Improved, safer, shorter pedestrian crosswalks with bulbouts to reduce the number of lanes crossed and a safe haven at the middle of the street</u>	Bulb-outs are recommended at all feasible corners on page 7.3 of the Specific Plan.
B21-29	5. <u>Improved sidewalks along El Camino to take an increased volume of pedestrian traffic in greater comfort and safety along a mixed use corridor with improved transit.</u>	See Responses to Comments A13-17 and A13-18.
B21-30	We want to reiterate that studies show <u>adding lanes to roadways create added "induced demand" which is likely to result in both an increase in traffic and further</u>	The comment is acknowledged and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project. No response

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Number	Comment	Response
	<u>reduced public safety; rather than improve an already unsafe traffic situation. Bike lanes, rather than additional lanes for motor vehicles, constitute the sustainable, long-term solution to current and anticipated future traffic load in the specific plan area.</u> Bicycle boulevards like Bryant Street in Palo Alto, are shining examples of established means of reducing car traffic that works for most age groups. Electric bikes and tricycles parking and charging plans can also allow more people to use bicycles. Addition of bike lanes, especially separated bike lanes, to El Camino Real and Millbrae Avenue will provide safe and efficient opportunities for alternative travel when walking is not an option, discourage auto use, and provide opportunities for the City to reduce significantly VMT per capita and mitigate air pollution and GHG emissions associated with the proposed MSASP buildout, as required by SB375.	required.
B21-31	In addition to encouraging pedestrian and bicycle modes by improving access for these modes, it is well known that strategies to <i>discourage</i> auto use are also extremely effective. These strategies should be a consequence of the goals outlined in the MSASP. For example, to what extent, target, goal, and time frame will travel by foot, bicycle, bus and rail be made more efficient and attractive? How efficient are travel times for each of these modes relative to each other? How can walking and bicycling be made the most attractive options. We propose that:	The comment provides suggestions to be considered for additional Transportation Demand Management (TDM) measures for future development, which are currently identified in the Specific Plan (see Table 7-2 in the Specific Plan). The comment is acknowledged and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the Project.
B21-32	1. Parking be entirely unbundled so that users pay to park throughout the MSASP area.	Unbundled parking is addressed on page 7.11 of the Draft Specific Plan.
B21-33	2. Employers use parking cash-out- employees are paid to not drive to work	Parking cash-out is addressed on page 7.11 of the Draft Specific Plan.
B21-34	3. Parking ratios be reduced and, at the same time, car-share spaces and car-share membership added. [Reduced parking increases affordability by reducing costs for building expensive parking garages and also by freeing up space, within the height envelop, that can be used for added housing or office space.]	The Draft Specific Plan supports developments providing the minimum amount of parking needed and includes measures to reduce parking demand including car share programs.
B21-35	4. Plan for only shared parking, preferably in separate public parking structures that can be removed and replaced if parking needs get reduced.	Shared parking is one of the parking strategies encouraged in the Draft Specific Plan.
B21-36	5. All buildings -office and residential- be required to participate in discounted transit pass programs so that residents and employees have transit convenience.	See 'Transit subsidies' in Table 7-2 of the Specific Plan.
B21-37	6. And, Resident Parking Permit programs need to be put in place, paid for by	Residential permit parking is addressed on page 7.11 of the Specific Plan.

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TABLE 5-1 RESPONSE TO COMMENTS MATRIX

Number	Comment	Response
	<p>developer fees, in the neighborhoods around the MSASP area to protect neighborhoods from overflow parking.</p>	
B21-38	<p><u>Land-Use and Planning</u> The height proposed for TOD #1 exceeds the maximum height identified in the specific plan update for the proposed site. The Draft EIR states that no mitigation is available for this impact, but that a reduced-intensity alternative may eliminate the need for mitigation (P. 2-23). The Sierra Club strongly supports high density development in the specific plan area, in line with Priority Development Area guidelines, and this is especially important since the proposed buildout is expected to <u>increase population in the specific plan area by nearly 600%</u> (Table 2-1).</p>	<p>The comment repeats findings made in the Draft EIR and expresses an opinion regarding high-density development, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B21-39	<p>We propose that the City <u>amend the planning document and zoning ordinance in the MSASP to include public benefit zoning</u>. This type of zoning would allow developers, like TOD # 1, to exceed current maximum height thresholds when it is safe to do so, in exchange for equivalent, much-needed community benefits such as <u>affordable housing, public open space, child care, free shuttle service, free or subsidized transit passes, car-share, subsidized community facilities, and other public improvement programs that would not normally be fundable</u>.</p>	<p>The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B21-40	<p>This draft EIR is short on analysis and public participation and this is particularly glaring in the approach to public benefits. The EIR is explicit that the entitlements are not included in the analysis. However entitlements and zoning change have occurred as a collusion between council and developers to the detriment of the public. According to ABAG, Public Benefit Zoning (PBZ)-also known as Land Value Recapture- is based on the premise that land use changes and enhancement enacted by a public agency contribute to increased real estate values. It is reasonable to expect that if a private landowner benefits from public action, some benefits must be extended towards the community as well. In addition to the value created by the upzoning for the developer (as under incentive zoning) additional value is extracted from the landowner and dedicated to community benefits.</p>	<p>The comment expresses an opinion about the public participation process and provides background information on public benefit zoning. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. As discussed in Chapter 1, Introduction, of the Draft EIR, a thorough examination of the existing regulatory and environmental setting in Millbrae is a critical initial step in the adoption and implementation of the proposed Millbrae Station Area Specific Plan Update and associated amendments to the General Plan and Zoning Ordinance, and approval and development of the proposed Transit-Oriented Developments (TOD) #1 and #2 (together referred to as the "proposed Project") and the certification of the Environmental Impact Report (EIR) process. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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TABLE 5-1 RESPONSE TO COMMENTS MATRIX

Number	Comment	Response
B21-41	<p><u>Affordable Housing</u> MSASP has a stated goal of 15% affordable housing. Yet the first development that is planned to go ahead (TOD #2) has no indication that affordable housing will be included. Affordable housing coupled with reduced parking has been demonstrated as the most effective strategy for meeting regional air quality and transportation goals.</p> <p>Affordable housing is important for meeting Priority Development Area goals because, individuals in the lower income brackets are the most likely to use alternative transportation options and to not add autos to the MSASP, thus contributing to meeting the air quality goals and public transportation, walking and bicycling mode-share goals.</p> <p>TOD #2 is on publicly owned land and, therefore, is the most obvious place to expect affordable housing and in a quantity exceeding the 15% stated goal. Again, the City can encourage affordable housing by applying public benefit zoning throughout the specific plan area.</p>	<p>The comment expresses an opinion regarding the application of affordable housing requirements and provides background information on benefits of affordable housing, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The goal of 15 percent affordable housing comes from an implementing program of the City's Housing Element as stated on page 4.17 of the proposed Specific Plan. As discussed in Chapter 3, Project Description, of the Draft EIR, the TOD #2 project would be required to comply with the 15 percent affordable housing development standard (see Table 3-3, Development Standards by Planning and Overlay Zones). While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B21-42	<p><u>Other mitigation strategies that should be made standard in the MSASP</u> In addition to the above strategies that we propose, it is also advisable to make other mitigation strategies standard and mandatory in the MSASP. These are strategies such as are considered in the city's Climate Action Plan (CAP) to meet greenhouse gas targets. Rather than leaving these strategies as optional, the MSASP should make many of these strategies mandatory in the plan area in order to assist the city to meet its goals. There are many and could include green infrastructure such as:</p>	<p>As identified in response to Comment B21-8 no significant GHG emissions impacts were identified. Therefore, the additional mitigation requested to reduce GHG impacts of the Project are not warranted. Also, while the City has a number of programs to reduce GHG emissions, the City has not adopted a municipal or communitywide GHG emissions reduction plan or climate action plan so it is unclear what "CAP" the Commenter is referring to. Furthermore, several of these measures are not effective in reducing GHG emissions (e.g. permeable paving, rain gardens, quiet road surface, and bird-friendly design do not reduce GHG emissions) or are not specific enough (e.g., "many others listed in the CAP). While mitigation measures are not warranted to further reduce GHG emissions, the proposed Plan requires implementation of a transportation demand management (TDM) Plan to encourage use of alternative modes of transportation. The Plan also includes several policies related to energy use and water efficiency:</p> <ul style="list-style-type: none"> ▪ P-UD 4. Require new development to employ sustainable building and site design principles, such as Leadership in Energy and Environmental Design (LEED), as promulgated by the U.S. Green Building Council, or other acceptable standards.

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TABLE 5-1 RESPONSE TO COMMENTS MATRIX

Number	Comment	Response
B21-43	• capturing and reusing all rainwater on site	Sustainable building and site design principles include minimizing impervious surfaces, orienting toward solar access, and incorporating energy-efficient elements. <ul style="list-style-type: none"> ▪ P-UTIL 3. Reduce water consumption through a program of water conservation measures. ▪ P-UTIL 10. Incorporate energy conserving design and equipment into new development in order to promote energy conservation. ▪ P-OS 5. Require open spaces and parks to incorporate sustainability measures, such as including native plant species, drought tolerant plants that require minimal irrigation, permeable paving, solar-powered lighting, and other similar features.
B21-44	• using recycled water with double piping throughout	The recommendation is noted and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Response to Comment B21-42.
B21-45	• permeable paving throughout	The recommendation is noted and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Response to Comment B21-42.
B21-46	• rain gardens along sidewalks and in open parking	The recommendation is noted and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Response to Comment B21-42.
B21-47	• quiet road surface for noise reduction in high density areas- rubberized road surface	The recommendation is noted and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Response to Comment B21-42.
B21-48	• mandatory solar energy - active and passive	The recommendation is noted and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Response to Comment B21-42.
B21-49	• priority for electric vehicles, electric charging stations, lower parking rates for electric cars	The recommendation is noted and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Response to Comment B21-42.

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TABLE 5-1 RESPONSE TO COMMENTS MATRIX

Number	Comment	Response
B21-50	<ul style="list-style-type: none"> requiring a high sustainability standard - higher than the standard LEED Silver - for the plan area 	The recommendation is noted and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Response to Comment B21-42.
B21-51	<ul style="list-style-type: none"> bird-friendly design for all the buildings as the developments are near the baylands where thousands of birds live and feed daily and on the Pacific Flyway for millions of migratory birds. 	The recommendation is noted and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Response to Comment B21-42.
B21-52	<ul style="list-style-type: none"> and many others listed in the CAP. 	The recommendation is noted and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Response to Comment B21-42.
B21-53	We submit the above comments with the expectation that our suggestions will be considered in improving the MSASP Update and associated Draft EIR. We hope that together we can bring the proposed MSASP update into realizing its obvious potential for being an improvement to the environment and economy of Millbrae, and the wellbeing of the residents of Millbrae rather than degrading their quality of life, health and safety.	The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
B22 Noveed Safipour		
B22-1	<p>My name is Noveed Safipour, and I am writing to comment on Millbrae's EIR for the Millbrae Station Area's plan. I currently serve as the President of a political club for the region--the Peninsula Young Democrats. I am writing regarding the impact the absence of housing in transit areas like MSA have, and to ask that the EIR add the environmental consequences for not including housing that's set at prices attainable to working class folks in any plan for the MSA.</p> <p>In recent months, our club has had a number of speakers talk about housing-related issues, from which it has become abundantly clear that the lack of housing in the Peninsula at attainable rates is creating environmental consequences. Workers are moving to Tracy and even Modesto and commuting to and from the Peninsula daily, producing tons of carbon emissions along the way. Additionally, not having housing near transit centers means public transportation is underutilized.</p>	The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
B22-2	As Climate Change worsens, we must include the impact of commutes in EIRs for projects that don't include housing. Please be sure to add such effects in your	The comment generally requests that the EIR address impacts from commute traffic and affordable housing, but does not state a specific concern or question regarding the

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TABLE 5-1 RESPONSE TO COMMENTS MATRIX

Number	Comment	Response
	<p>study of any plan that lacks adequate housing options for working class families-- that is, the average carbon emissions resulting from a commute from a place where workers currently live due to the housing crisis for the number of workers who aren't living in the MSA due to the absence of attainable housing.</p>	<p>sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The commenter generally requests that the EIR address the climate change impacts associated affordable housing and its effect on commute trip. Chapter 4.6, Greenhouse Gas Emissions addresses GHG emissions associated with the vehicle miles traveled (VMT) generated by the land uses within the Project site, including emissions associated with employee commute trips. The proposed Specific Plan is a mixed-use project that would increase residential density near transportation centers. Strategies that increase residential density and provide a mix of land uses are consistent with the regional GHG reduction goals identified in the Association of Bay Area Government's (ABAG) and the Metropolitan Transportation Commission's (MTC) Plan Bay Area and its regional per capita GHG reduction goals for passenger vehicles and VMT (see Impact LU-2 and Impact GHG-2). Additionally, the proposed Specific Plan includes transportation demand management strategies including widening sidewalks, enhancing pedestrian crossings, installing separated bicycle lanes and parking facilities, accommodating of a bus rapid transit-style service, encouraging of shared parking measures, and includes policies to encourage use of alternative modes of transportation and further reduce project-generated VMT. The Draft EIR provides a detailed analysis of traffic-related impacts, including impacts from commuters using the Project site, in Chapter 4.13, Transportation and Circulation, of the Draft EIR. In addition, the Specific Plan includes requirements for affordable housing.</p>
B22-3	<p>Also, for the possible options/alternatives in which MSA produces new jobs for the region, please add the impact on carbon emissions for those workers commuting from the East Bay, where they would likely have to reside due to the lack of attainable housing. We need EIRs to start taking this information into account, and it does not seem to fully consider the lack of attainable housing as it stands right now.</p>	<p>The commenter is directed to Chapter 4.3, Greenhouse Gas Emissions, for a complete discussion on the impacts from carbon emissions from increased vehicular trips as a result of the proposed Project.</p>
B22-4	<p>Please let me know if you require any further information to evaluate and consider this comment.</p>	<p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>

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Number	Comment	Response
B23	Ann Schneider, 406 Palm Avenue, Millbrae, California, 94030	
B23-1	<p>Thank you for the opportunity to comment on the Millbrae Station Area specific Plan and the Draft Environmental Impact Report. In the time allowed for review and comments there is no way I could review each page so my comments cover just a couple of components of the MSASP/DEIR.</p> <p>Here are my concerns:</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
B23-2	<p>MSASP- Page 4 Existing Condition- Demographics- Millbrae is more than Asian and whites and besides shouldn't whites be capitalized. This section should actually reflect the full census data.</p>	<p>The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B23-3	<p>MSASP- Page 6- Types of Businesses Millbrae could attract -I think this section is demonstrative of how the MSASP is written, it is very limiting, and lacking in vision. This section says all we can really attract is more restaurants and convenience retail like dry cleaners. If our guiding document is this negative, or this limiting in what we can attract then we have no hope to bring in the revenues we need to maintain Millbrae infrastructure. This section and the related MSASP 3.2.3.4 Transportation</p> <p>My main concern is that there are not significant changes to the form of El Camino Real. When I read this section and the related transportation sections, it feels like Millbrae is accommodating drivers from outside of Millbrae and doing very little for all of us who live or work in Millbrae. El Camino Real is too wide and has too many lanes. We are a "pass through" community. The new MSASP continues this by placing the emphasis on getting to and from the station quickly. I don't see any Grand Boulevard concepts that change our existing El Camino Real to a walkable or bicycle Friendly Street.</p> <p>The previous MSASP showed a plan for getting bus and drop off (kiss and ride) to be on a frontage road with a true divider with more planting, better sidewalks resulting in a narrower El Camino. It also included a pedestrian walkway over El</p>	<p>The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The California Avenue extension allows vehicle and bus circulation internal to the future TOD on Site 1 and off of El Camino Real. The South Station Road reconfiguration would allow for more efficient transit operations. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Responses to Comments A13-17 and A13-18, and Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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Number	Comment	Response
	<p>Camino, the only truly safe way to cross our portion of El Camino Real. This plan gives up on this idea. This plan should reflect what we the residents and employees need to live in a vibrant and safe Millbrae. We need a major overhaul of El Camino. Instead this gives us the same size El Camino, and then extends California as another four lane road to connect with Victoria. The diagrams show that the existing Serra Ave will continue. I have seen Serra Station plans that have this as a plaza and community gathering place. This is really disappointing and will not give Millbrae what we really need, beautiful safe gathering spaces.</p> <p>On the other side it recommends the addition of another road. I am not sure how adding more roads makes this a transit oriented development. To me this seems like adding more roads so more cars can pass through Millbrae, without spending any money and leaving us the congestion, noise, air and water pollution.</p> <p>If I read this correctly, the plan wants buses and shuttles to drop passengers off directly in front of the escalators leading up to the trains. But if this happen, then these people will not be walking past the new retail, or the new restaurants. How is this bringing any revenue to Millbrae? Drop off locations should be designed to get people to walk past retail, if not it is my guess that these retail locations will fail and that doesn't help the City, the people of Millbrae, the property owners or BART. If Multimodal users are not directed past the stores, who then will shop there? It will just be the people of Millbrae, who can't safely cross El Camino Real unless they are in a car. Surely Millbrae should see some financial benefit from out of towners using us to get to transit. How is this Grand Boulevard, and how does this bring in sales tax revenue to Millbrae? Will this new retail only be used by the new TOD residents? If this is the plan, I don't think that is sustainable.</p> <p>Today's San Francisco Chronicle, August 10, 2015 is a front page article titled "Making Market Less Car-Friendly". It talks about changing roads to improve safety for pedestrians. Millbrae deserves the same consideration.</p>	
B23-4	<p>MSASP 3.2.3.5 Utilities 3.35 Water- This plan is our opportunity to discuss water recycling. Instead it just mentions that we don't have any water recycling. The Water Pollution Control</p>	<p>The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental</p>

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	<p>Plant is within the MSASP. Shouldn't there be a discussion of bringing purple pipe system to this area and up to El Camino so eventually there is a line to school playing fields and the Green Hills Country Club golf course? This section seems perfunctory and lacking in vision. This land will be developed. Getting the pipes in the ground now seems only logical.</p>	<p>issue. As discussed in Chapter 3, Project Description, of the Draft EIR the Specific Plan Update requires all development projects to use recycled urban water for the irrigation of landscapes, plazas, and playgrounds to reduce demand for potable water. All new projects shall provide purple pipes in the street adjacent to their property for future hookup to the citywide purple pipe network, and pay for Development Impact Fees as required in Article XVIII of the City's Zoning Code. Specific Plan Policy P-UTIL 16 requires the installation of infrastructure for "purple pipes" for future use of recycled water when available. All public improvements shall be constructed in accordance to the most recent edition of the Millbrae Public Works Standard Plans and Specifications. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>
B23-5	<p>On site storm water retention is not discussed. Developers can be encouraged to have storm water collection systems for onsite landscape watering as well as the inclusion of gray water plumbing systems in the new construction.</p>	<p>Site design measures, source control measures, and treatment control measures for new and redevelopment project are listed in Chapter 4.8, Hydrology and Water Quality, and include bioretention area/rain garden (see page 4.8-28). The commenter's suggestion for the application of gray water is noted.</p>
B23-6	<p>Waste Water- given the new waste water rate increases, this section needs expansion to explain that the new developments will have new piping and the opportunity to redo the existing pipes so as to alleviate the concerns brought recently by the public. Plus it would help the City if an explanation that the new units, commercial and residential will be paying for waste water. My question is with the addition of all these new units will it bring down the cost per utility customer will pay as there will be more billing locations. It seems to me that if you are adding say 500 new rate payers, which that number when added to existing rate payers will bring the monthly waste water fees down. If this is true then this should be explained so the rest of Millbrae will not think these new developments are costing them more money.</p>	<p>The commenter request information about utility rates as a result of the proposed Project; however, details regarding specific rates for the long-term plan such as the Specific Plan are not required as part of the environmental analysis. As described in Chapter 3, Project Description, of the Draft EIR, wastewater line improvements within the Specific Plan Area would need to occur to provide adequate sewer services to properties in the Specific Plan Area as they develop. Required wastewater line improvements for the TOD #1 project are shown on Figure 3-17. New improvements for the TOD #2 project include a new 6-inch service line would be needed in Victoria Avenue to the north to redirect the 6-inch line that drains south from Hemlock Avenue, and a new 8-inch service in Railroad Avenue may still be required (see page 3-60). Specific Plan Policy P-UTIL 6 requires future developers to improve the wastewater collection system to accommodate demands from new development. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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B23-7	I see no overview discussion of sea level rise or climate adaptation actions in this section at all. But more torrential rains will lead to the need for fast drainage and at least on the BART side, this is some of our lowest land. I would think a discussion of flooding and flood remediation should be mentioned here and then described in more detail in later sections.	Impacts from flooding are discussed in detail in Chapter 4.8, Hydrology and Water Quality, of the Draft EIR. As discussed in this chapter, the Specific Plan Update would involve redevelopment of an already built out area that is currently connected to the City's storm drain system. Future development under the Specific Plan Update would not involve the alteration of any natural drainage channels or any watercourse. It also would not significantly alter existing drainage patterns other than creating additional internal storm drains to convey runoff to the existing storm drain system and adding new stormwater treatment measures. See Response to Comment B19-32 regarding sea level rise.
B23-8	Why is there no section encouraging BART to put solar arrays on the top of the parking garage. All surface lot parking should have to have solar. If Millbrae wants to be the best multi-modal station, then the MSASP should be pushing for solar systems, rainwater retention, natural vegetation and everything else that will reduce not just this areas climate footprint but help the rest of Millbrae reduce our consumption of resources while becoming locally energy selfsufficient.	The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
B23-9	3.7- Solid Waste- this section as well as the portion of the DEIR that covers solid waste does not discuss the need for space for separation of organics, recyclables from garbage. It does talk about South San Francisco Scavengers and compliance with AB939 but if we have achieved the current diversion goals as outlined in SB341. Nor does it talk about the organics system in Millbrae for businesses and resident where organics are going to the Blue Line Transfer station and processed into Biogas. This is something all of us in Millbrae should be very proud of. But it isn't even mentioned, nor is space allocation for storage of materials. This has been state law since the early 1990s. Perhaps it is in the City's Green Building Ordinance. Either way it should be referenced here and in appropriate sections of the MSASP and DEIR.	As described in Chapter 4.14, Utilities and Service Systems, impacts to solid waste are evaluated 1) based on the ability to be served by a landfill with sufficient permitted capacity to accommodate the proposed Project's solid waste disposal needs, and 2) to be in compliance with federal, State, and local statues and regulations related to solid waste. As discussed in Chapter 4.14, the City's disposal rates for both residents and employees have been below target rates since 2007. The solid waste from generated from buildout of the Specific Plan Update is also less than three percent of the permitted daily capacity of the landfill with the smallest daily capacity (i.e. 2,400 tons/day) of any of the four landfills shown on Table 4.14-21. As such, buildout of the Specific Plan Update would have a less-than-significant impact with regard to daily capacity at each of the landfill facilities.
B23-10	3.3.4.5 Circulation and Access Why do we need new roads? We need to remove Serra Ave. Roads just cost Millbrae money to maintain. The previous MSASP was so much better in giving us a development that would add to Millbrae. I understand that there are multiple property owners here, but the SP should be a vision for the future, not an excuse to keep this area looking as it does.	The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The California Avenue extension allows vehicle and bus circulation internal to the future TOD on Site 1 and off of El Camino Real. The South Station Road reconfiguration would allow for more efficient transit operations. While no response is required as a part

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B23-11	<p>3.3.5.1 Demolition Page 3.59 The description of demolition and site preparation makes no mention of possible relocation of buildings or deconstruction for reuse or even separation of materials to maximize recycling or for the reuse of some materials back into the project site. This section needs to be rewritten with Zero Waste goals in place that will encourage maximizing reuse and recycling, including the potential of transplanting trees for reuse elsewhere or on site. If the trees mentioned are the big eucalyptus trees then they could be cut down and sent to mini mills to create lumber. TOD1 and TOD2 can be great examples of green building principles. These principles need to be reflected in the MSASP.</p> <p>TOD2 talks about moving inert materials (concrete and asphalt) off site. Is there a need for gravel on site in which case it can be reused on site? This is fairly common now and should be considered. Millbrae and TOD2 will gain financially by adding more green components and selling the development as a green project. But to claim this it needs to be green from site preparation to operations of the completed buildings.</p>	<p>of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p> <p>As discussed in Chapter 4.14, Utilities and Service Systems, future development would be required to comply with the California Building Code Section 4.408, which requires a minimum of 50 percent of non-hazardous construction and demolition debris to be recycled or salvaged. Per Section 4.408, the Project applicant's under the Specific Plan Update would be required to prepare a Waste Management Plan, for on-site sorting of construction debris, which is submitted to the City for approval, in order to ensure that the covered Project meets the diversion requirement for reused or recycled C&D debris.</p>
B23-12	<p>Conclusion In all of the public meetings, hearings or the two documents is there a discussion of the benefits to Millbrae at large other than the implied sales tax or transit occupancy taxes. The MSASP should talk about how the revenue generated with development can benefit Millbrae as a whole. Where will the monies be used? Will we gain truly enjoyable public spaces, will the bike trails actually be built, and can money be set aside to create the dog park and a community garden? How are the people in these new developments going to safely get to Broadway to shop or eat? How will the people of Millbrae get to these developments, without driving? Will money be set aside so community groups can actually afford to use new community spaces should they be built? Where is the vision that ties the MSASP into the rest of Millbrae, other than by more, wider, faster roads and</p>	<p>The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.</p>

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	<p>cars? I think this plan has a better chance of being accepted by our residents and businesses if they can easily understand how the developments under consideration in this MSASP and DEIR can benefit all of Millbrae. Neither of these documents to me makes it clear how the Station Area will tie into the rest of Millbrae. There was some really good ideas in the original MSASP, bring them back. This version has to be greener. The entire area, under this plan becomes even more car centric (except perhaps for the new residential units). Millbrae needs retail, we need places to gather that are out of the wind. We deserve some beautiful plazas in this area, we need lush and drought tolerant planting, spaces we want to walk to, and we need to use MSASP to create an exciting station that can be used by all.</p>	
B24	Charles E. Fancher, Jr., Fancher Partners, LLC and PPC Land Ventures, Inc.	
B24-1	<p>Ms Diorio – 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 comments addressing the Millbrae Station Area Specific Plan Update and Transit-Oriented Development #1 and #2 projects.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
B24-2	<p>1. Figure 3-2 of the EIR only identifies "TOD #1 Boundary," which includes a mix of uses (office, retail and residential). TOD #1 has direct access off of El Camino Real, with direct access opportunity to BART. The existing street pattern is substantially left in place relative to Sierra Avenue and Linden Avenue. The Private Drive proposed to connect with the railroad Avenue is a more efficient access than the limited access of Linden Avenue. Request the TOD #1 project analyze an alternative that vacates Linden Avenue and portion of Serra Avenue so as to create a greater developable parcel between Millbrae Avenue and Linden Avenue.</p>	<p>The comment requests that an additional alternative be included in the Draft EIR. No additional alternative is required as stated by the commenter. As described in Chapter 5, Alternatives to the Proposed Project, the alternative evaluation is aimed at evaluating scenarios that would reduce or eliminate the significant impacts of the Project that is the subject of the EIR. See Response to Comment A5-8.</p>

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B24-3	2. When evaluating on a project level TOD #1, what consideration was made for the viability of development for the balance of adjacent property? Consideration should be given to a project alternative that evaluates the whole of Area 1 and not just TOD #1. Such evaluation should consider viable development capacity of the remaining properties, while considering a comprehensive vehicle access and pedestrian circulation plan.	The TOD #1 project is a proposed development by the owner of the property and does not consider development of property that is not under the owners control to develop. No additional alternative is required as stated by the commenter. As described in Chapter 5, Alternatives to the Proposed Project, the alternative evaluation is aimed at evaluating scenarios that would reduce or eliminate the significant impacts of the Project that is the subject of the EIR. See Response to Comment A5-8.
B24-4	3. The total number of rooms within the Conceptual Development Program assumes 370 rooms. The draft Specific Plan identifies a 6-12 story hotel at the corner of El Camino Real and Millbrae Avenue (Figure 4-8, Area 1 Illustrative Plan). This use was not included in the TOD #1, however seems to be a better location given access and connectivity with BART. Please provide the market support for locating a hotel at the north east corner of Millbrae and El Camino Real. Additionally, please clarify if the locations of the hotels are "concept" and that the exact location of the hotel site within the TOD land use will be market driven.	The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.
B24-5	4. 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	The comment pertains to an aspect of the proposed Project and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. While no response is required as a part of the CEQA process, the comment is acknowledged and will be forwarded to the decision-making bodies for their consideration as part of the Project review process. See Master Response, Standards for Responses to Comments, and Focus of Review of Commenters.

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	<p>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.</p>	
B24-6	<p>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.</p>	<p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>