

APPENDIX A:  
COMMENT LETTERS



**DEPARTMENT OF TRANSPORTATION**

DIVISION OF AERONAUTICS  
P. O. BOX 942874, MS-40  
SACRAMENTO, CA 94274-0001  
PHONE (916) 654-4959  
FAX (916) 653-9531  
TTY 711  
www.dot.ca.gov



*Serious drought.  
Help save water!*

July 16, 2015

Ms. Christine di Iorio  
City of Millbrae  
Community Development Department  
621 Magnolia Avenue  
Millbrae, CA 94030

Dear Ms. di Iorio:

Re: Draft Environmental Impact Report for the Millbrae Station Area Specific Plan Update  
SCH No. 2014092061

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.

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).

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.

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 agency may, after a public


A1-1

Ms. di Iorio  
July 16, 2015  
Page 3

A14-1  
(cont.)

questions, please contact me at (916) 654-6223, or by email at [philip.crimmins@dot.ca.gov](mailto:philip.crimmins@dot.ca.gov).

Sincerely,



PHILIP CRIMMINS  
Aviation Environmental Specialist

c: State Clearinghouse, San Mateo County ALUC, San Francisco Int'l Airport





**Housing Leadership Council  
of San Mateo County**

139 Mitchell Avenue, Suite 108  
South San Francisco, CA 94080  
(650) 872-4444 / F: (650) 872-4411  
www.hlcsmc.org

July 21, 2015

Mayor Robert Gottschalk and City Council Members  
621 Magnolia Avenue  
Millbrae, CA 94030

**Re: City of Millbrae - Millbrae Station Area Specific Plan Update**

Dear Mayor Gottschalk and City Council Members,

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.

A2-1

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:

A2-2

- 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.
- Under the *Palmer v. City of Los Angeles* 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.

A2-3

A2-4

**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, 2014<sup>1</sup>, 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**

A2-5

<sup>1</sup> [http://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=201320140AB2135](http://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB2135)

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).

The Department of Housing and Community Development released a memo<sup>2</sup> on March 27, 2015, summarizing that AB2135 requires:

- 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.

A2-5  
(cont.)

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 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.

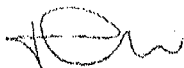
We have also seen in other Downtown Station Area planning processes across the region where increased development has put significant pressures on housing costs, as landlords and property owners see an opportunity to charge a premium for their proximity to transit-accessible areas, retail, and other 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.

A2-6

Thank you for your consideration and we look forward to continue working with the City through the planning process.

A2-7

Sincerely,



Tracy Choi  
Community Builder  
Housing Leadership Council of San Mateo County

CC: Deborah Nelson, Community Development Director  
Marty VanDuyn, Community Development Project Manager  
Christine Di Iorio, Planner  
Ellen Smith, Manager for Strategic and Policy Planning

<sup>2</sup> <http://www.hcd.ca.gov/housing-policy-development/docs/ab2135-ta-memo032715.pdf>

## Soyeb Palya

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**From:** Marty Van Duyn  
**Sent:** Monday, July 27, 2015 4:03 PM  
**To:** Soyeb Palya  
**Subject:** FW: BART letter to San Mateo Housing Leadership Council re AB 2135  
**Attachments:** Letter to SM Housing Leadership AB 2135 205 july 27.pdf; Letter SM Housing Leadership Council - 2015-07-21.pdf

Please add this to plan and DEIR comment file.

Thanks, marty

-----Original Message-----

**From:** Ellen Smith [mailto:[esmith1@bart.gov](mailto:esmith1@bart.gov)]  
**Sent:** Monday, July 27, 2015 3:31 PM  
**To:** Marcia L. Raines; 'Bill Kelly'; Marty Van Duyn; Christi Dilorio  
**Subject:** BART letter to San Mateo Housing Leadership Council re AB 2135

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.

Ellen Smith  
Manager, Strategic and Policy Planning  
BART Planning + Development + Construction  
300 Lakeside Drive, 22nd Floor  
Oakland, CA 94612  
510.287.4758  
[esmith1@bart.gov](mailto:esmith1@bart.gov)

(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)

Comment Letter A3

A3-1

A3-2



**SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT**

300 Lakeside Drive, P.O. Box 12688  
Oakland, CA 94604-2688  
(510) 464-6000

2015

July 27, 2015

Thomas M. Blalock, P.E.  
PRESIDENT

Tom Radulovich  
VICE PRESIDENT

Grace Crumlean  
GENERAL MANAGER

Housing Leadership Council of  
San Mateo County  
139 Mitchell Avenue, Suite 108  
South San Francisco, CA 94080  
Attn: Tracy Choi

**DIRECTORS**

Gail Murray  
1ST DISTRICT

Joel Keller  
2ND DISTRICT

Rebecca Saltzman  
3RD DISTRICT

Robert Raburn, Ph.D.  
4TH DISTRICT

John McPartland  
5TH DISTRICT

Thomas M. Blalock, P.E.  
6TH DISTRICT

Zachary Mallett, MCP  
7TH DISTRICT

Nicholas Josefowitz  
8TH DISTRICT

Tom Radulovich  
9TH DISTRICT

Re: AB 2135's Applicability to the Millbrae Station Area  
Specific Plan's TOD #2

Dear Ms. Choi:

I write in response to your dated July 21, 2015 to the City of Millbrae and BART's Strategic and Policy Planning Manager. I understand that the HLC has requested clarification as to the applicability of AB 2135 to the San Francisco Bay Area Rapid Transit District's ("District" or "BART") TOD #2 property ("Property").

The Property is not "surplus land" as defined under applicable law and, as such, is not subject to AB 2135. As your letter states, AB 2135 modifies and relies on current law, the Surplus Land Act (Government Code Sections 54220 et seq.). As AB 2135 did not modify the Surplus Land Act's definition of "surplus land," the definition applies and is as follows:

"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." Government Code Section 54221, Surplus Land Act.

The Property has not been determined as "no longer necessary" for District use. In fact, the Property is currently being used for BART parking and an intermodal bus facility, and after TOD #2 is implemented, will be used for BART parking and BART-oriented development. Transit-oriented development is enumerated, by State statute and the District's enabling legislation, as a legitimate and

Housing Leadership Council of San Mateo County

July 27, 2015

Page 2

necessary District use.<sup>1</sup> Accordingly, AB 2135 does not apply because the Property is necessary for the District's transit-oriented development and parking uses and is not surplus land as such term is defined under State law.

Sincerely,

OFFICE OF THE GENERAL COUNSEL

*Minming Wu Morri*

Minming Wu Morri, Attorney

MW:pab

cc: E. Smith, Strategic and Policy Planning  
S. Shaffer, Real Estate and Property Development  
E. Low, Office of the General Counsel

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<sup>1</sup> The District Act provides in relevant part that the District may purchase, lease, convey, hold and enjoy "real and personal property of every kind necessary for transit-oriented joint development projects..." Public Utilities Code Section 29010.3.(a).



**Housing Leadership Council  
of San Mateo County**

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July 21, 2015

Mayor Robert Gottschalk and City Council Members  
621 Magnolia Avenue  
Millbrae, CA 94030

**Re: City of Millbrae - Millbrae Station Area Specific Plan Update**

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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 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.

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Thank you for your consideration and we look forward to continue working with the City through the planning process.

Sincerely,



Tracy Choi  
Community Builder  
Housing Leadership Council of San Mateo County

CC: Deborah Nelson, Community Development Director  
Marty VanDuyn, Community Development Project Manager  
Christine Di Iorio, Planner  
Ellen Smith, Manager for Strategic and Policy Planning

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<sup>2</sup> <http://www.hcd.ca.gov/housing-policy-development/docs/ab2135-ta-memo032715.pdf>

**From:** Rich Newman

**Sent:** Wednesday, August 05, 2015 2:12 PM

**Subject:** FAA LETTERS RE: TOD1 AND SFO LETTER TO FAA - Millbrae Station Area Specific Plan Update and Transit-Oriented Development #1 & #2 Comment

Christi:

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:

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.
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 in the location specified in each, exceeds obstruction standards. Each letter addresses slightly different geographical points in the same project.

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.

I would ask that these letters be accepted in the normal course of comments on the captioned plans.

Thank you,

Richard Newman

---

Richard M. Newman  
City of Millbrae Liaison to SFO  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030  
650-259-9559 phone  
650-343-6111 fax





San Francisco International Airport

July 30, 2015

VIA EMAIL

Karen McDonald  
Specialist  
Mail Processing Center  
Federal Aviation Administration  
Southwest Regional Office  
Obstruction Evaluation Group  
2601 Meacham Boulevard  
Fort Worth, TX 76193

**Subject:** *San Francisco International Airport concerns regarding several recent OE/AAA cases submitted in the City of Millbrae, CA*

Dear Ms. McDonald:

The San Francisco International Airport (SFO or the Airport) has recently become concerned about a number of Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) cases submitted for review by the FAA for permanent buildings and other structures located around the Bay Area Rapid Transit (BART) station within the City of Millbrae, CA (Millbrae). It appears that these cases include requested building heights that penetrate airspace surfaces associated with operations at SFO and would also be inconsistent with height limits proposed under the City of Millbrae's Specific Plan update for the Millbrae Station Area which is currently undergoing environmental review. A list of cases of potential concern to SFO along with a map depicting the location of these cases is attached to this letter.

The concerns of SFO can be categorized into three general areas: (1) potential penetrations of airspace protection surfaces associated with departure procedures from Runways 19L and 19R, (2) potential penetrations of airspace protection surfaces associated with approach procedures to Runways 1L and 1R, and (3) penetrations of One Engine Inoperative (OEI) airspace protection surfaces associated with departures from Runways 19L and 19R.

With regard to (1), the Airport is concerned that many of the cases listed involve buildings that may penetrate the initial climb areas associated with Standard and potentially the non-Standard departure procedures from Runway 19L and 19R. Increasing the required climb gradient for departures on Runways 19L and 19R beyond their current limits may be impractical for aircraft departing these runways as they already approach the maximums feasible for commercial aircraft. This could in turn result in the departure capacity of the Airport being reduced and increased departure delays in certain wind conditions.

With regard to (2), it is noted that there are currently area navigation visual procedures under development for approaches to Runways 1L and 1R. The Airport is concerned that many of the

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

EDWIN M. LEE  
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AIRPORT DIRECTOR

Post Office Box 8097 San Francisco, California 94128 Tel 650.821.5000 Fax 650.821.5005 www.flysfo.com

Karen McDonald  
Page 2 of 2

cases listed involve buildings that may penetrate airspace protection surfaces associated with these procedures or otherwise be a hazard to air navigation at the proposed heights due to the reduced separations between the proposed structures and aircraft flight paths.

With regard to (3), the Airport understands that, although it is being considered under Notice of Proposed Rule Making (NPRM) *Proposal to Consider the Impact of One Engine Inoperative Procedures in Obstruction Evaluation Aeronautical Studies* (Docket No. FAA-2014-0134), the FAA does not currently consider OEI airspace protection surfaces as critical airspace. However, the Airport has worked in coordination with the local Airport Land Use Commission (a land use review body formed in accordance with California's State Aeronautics Act) to develop consolidated OEI airspace protection surfaces for departures from Runways 19L and 19R at SFO. The policies in the Airport Land Use Compatibility Plan for the Environs of SFO has a consistency requirement for new building proposals that they be lower than both the consolidated OEI airspace protection surface as well as below any height determined by the FAA to be a hazard to air navigation. SFO is concerned that all of the cases listed involve structures that would penetrate OEI airspace protection surfaces listed for the Runway 19R corridor as noted in Table 1, attached, and would negatively affect the ability of SFO to support airline departure operations.

The Airport requests that the FAA take the Airport's concerns into consideration in its evaluation of the OE/AAA cases listed in Table 1. SFO believes that, if the allowed heights were adjusted down so that they were below the Runway 19R OEI airspace protection surface and below the airspace protection surfaces associated with approach and departures procedures for Runways 1L-19R and 1R-19L, they would not interfere with Airport operations or create an air navigation hazard.

The Airport appreciates the FAA's consideration of this request. If I can be of further assistance regarding this matter, please do not hesitate to contact me at (650) 821-7867 or at [john.bergener@flysfo.com](mailto:john.bergener@flysfo.com).

Sincerely,



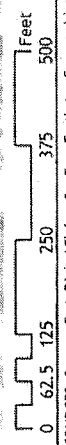
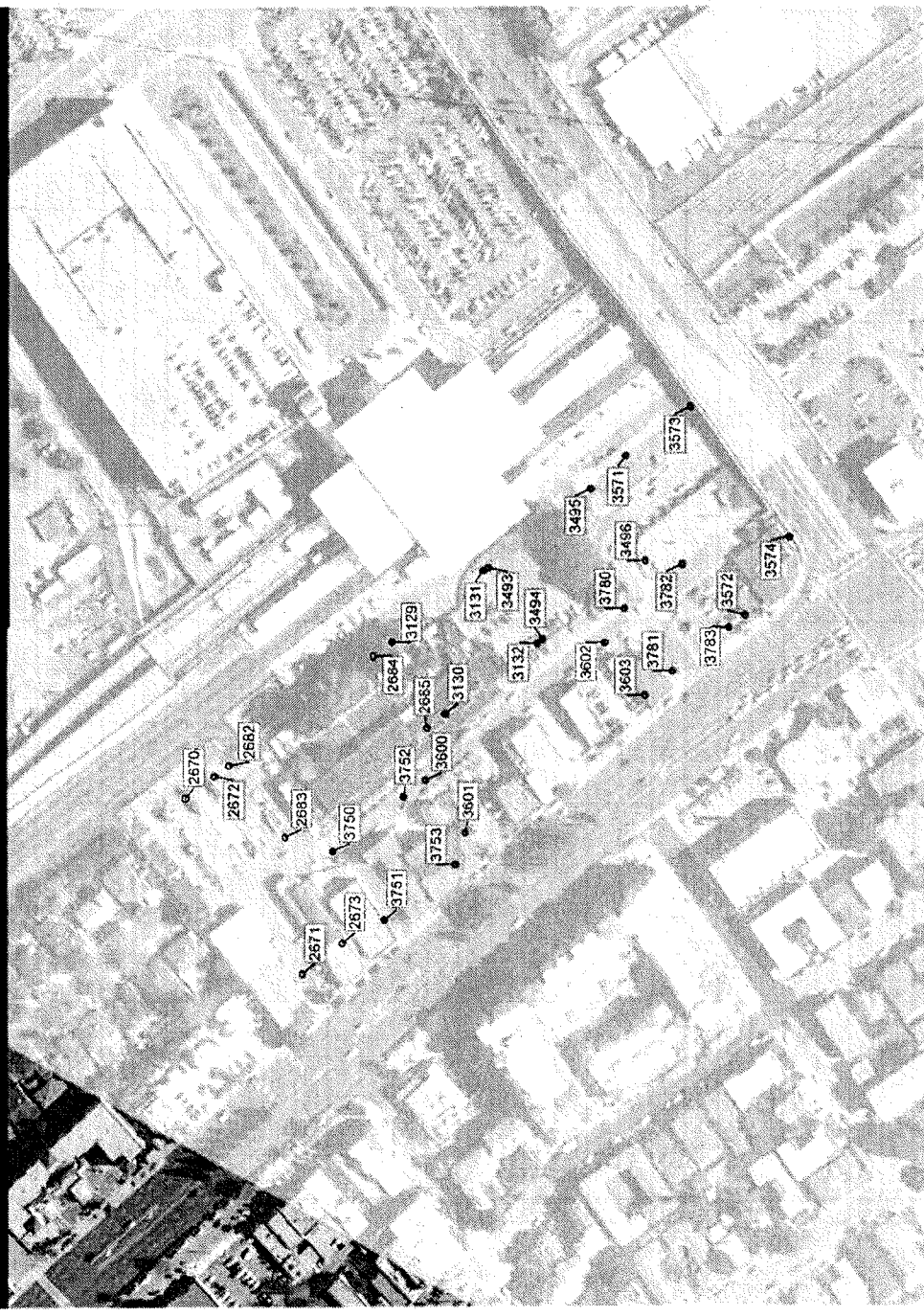
John Bergener  
Airport Planning Director  
San Francisco International Airport  
Bureau of Planning and Environmental Affairs

Attachments (2)

Table 1: iALP Height Restrictions for 2015 Airspace Cases at Millbrae Station

Airspace Case Number	Status	Latitude	Longitude	Site Elevation (AMSL)	Structure Height (AGL)	Overall Height (AMSL)	Maximum Allowable Height	Exceeds By	Controlling Surface
2015-AWP-2670-OE	Circularization	37° 36' 4.0300"	122° 23' 18.3401"	21	125	146	123.92	22.08	Runway 19R OEI Corridor
2015-AWP-2671-OE	Circularization	37° 36' 2.4000"	122° 23' 21.3101"	21	125	146	129.4	16.6	
2015-AWP-2672-OE	Circularization	37° 36' 3.6400"	122° 23' 17.9498"	21	125	146	124.73	21.27	
2015-AWP-2673-OE	Circularization	37° 36' 1.8600"	122° 23' 20.7701"	21	125	146	130.52	15.48	
2015-AWP-2682-OE	Circularization	37° 36' 3.4400"	122° 23' 17.7601"	24	125	149	125.15	23.85	
2015-AWP-2683-OE	Circularization	37° 36' 2.6700"	122° 23' 18.9701"	24	125	149	127.65	21.35	
2015-AWP-2684-OE	Circularization	37° 36' 1.5000"	122° 23' 15.8302"	24	125	149	129.18	19.82	
2015-AWP-2685-OE	Circularization	37° 36' 0.7300"	122° 23' 17.0498"	24	125	149	131.68	17.32	
2015-AWP-3129-OE	Interim	37° 36' 1.2400"	122° 23' 15.5800"	27	132	159	129.72	29.28	
2015-AWP-3130-OE	Interim	37° 36' 0.4800"	122° 23' 16.8000"	27	132	159	132.2	26.8	
2015-AWP-3131-OE	Interim	37° 35' 59.9900"	122° 23' 14.3300"	27	132	159	132.31	26.69	
2015-AWP-3132-OE	Interim	37° 35' 59.2300"	122° 23' 15.5602"	27	132	159	134.79	24.21	
2015-AWP-3493-OE	Work In Progress	37° 35' 59.9200"	122° 23' 14.2699"	27	135	162	132.46	29.54	
2015-AWP-3494-OE	Work In Progress	37° 35' 59.1600"	122° 23' 15.4900"	27	132	159	134.94	24.06	
2015-AWP-3495-OE	Work In Progress	37° 35' 58.5300"	122° 23' 12.8800"	30	132	162	135.34	26.66	
2015-AWP-3496-OE	Work In Progress	37° 35' 57.7600"	122° 23' 14.1000"	30	132	162	137.84	24.16	
2015-AWP-3571-OE	Work In Progress	37° 35' 58.0600"	122° 23' 12.3000"	30	132	162	136.26	25.74	
2015-AWP-3572-OE	Work In Progress	37° 35' 56.3700"	122° 23' 15.0000"	30	132	162	141.77	20.23	
2015-AWP-3573-OE	Work In Progress	37° 35' 57.1800"	122° 23' 11.4299"	30	132	162	138.09	23.91	
2015-AWP-3574-OE	Work In Progress	37° 35' 55.7800"	122° 23' 13.6500"	30	132	162	142.64	19.36	
2015-AWP-3600-OE	Work In Progress	37° 36' 0.7400"	122° 23' 17.9498"	27	132	159	132.07	26.93	
2015-AWP-3601-OE	Work In Progress	37° 36' 0.1800"	122° 23' 18.8401"	27	132	159	133.89	25.11	
2015-AWP-3602-OE	Work In Progress	37° 35' 58.3000"	122° 23' 15.5198"	27	132	159	137.13	21.87	
2015-AWP-3603-OE	Work In Progress	37° 35' 57.7400"	122° 23' 16.4198"	27	132	159	138.95	20.05	
2015-AWP-3750-OE	Work In Progress	37° 36' 2.0100"	122° 23' 19.2001"	24	125	149	129.43	19.57	
2015-AWP-3751-OE	Work In Progress	37° 36' 1.2800"	122° 23' 20.3600"	24	125	149	131.8	17.2	
2015-AWP-3752-OE	Work In Progress	37° 36' 1.0400"	122° 23' 18.2400"	24	125	149	131.44	17.56	
2015-AWP-3753-OE	Work In Progress	37° 36' 0.3100"	122° 23' 19.3898"	24	125	149	133.81	15.19	
2015-AWP-3780-OE	Work In Progress	37° 35' 58.0400"	122° 23' 14.9201"	30	139	169	137.51	31.49	
2015-AWP-3781-OE	Work In Progress	37° 35' 57.3700"	122° 23' 15.9900"	30	139	169	139.69	29.31	
2015-AWP-3782-OE	Work In Progress	37° 35' 57.2600"	122° 23' 14.1600"	30	139	169	139.13	29.87	
2015-AWP-3783-OE	Work In Progress	37° 35' 56.5900"	122° 23' 15.2200"	30	139	169	141.31	27.69	

2015 AIRSPACE CASES



SOURCES: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, Swisstopo, and the GIS User Community; FAA OE/AAA; SFO Bureau of Planning and Environmental Affairs, July 2015.

NOTE: Please see Table 1 for height restrictions by case.

LEGEND

- Case Status
- Circularization
  - Interim
  - Work In Progress
  - OEI surface (shaded)

AREA OF DETAIL

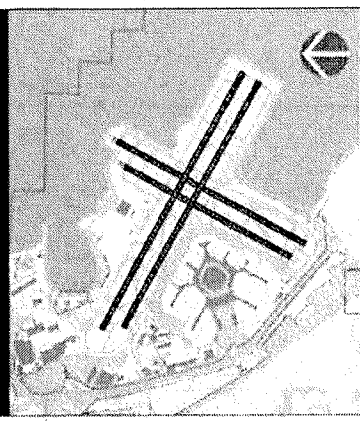


FIGURE OEAAA-1  
2015 FAA Airspace Cases at Millbrae Station  
Airport Land Use Compatibility Analysis  
San Francisco International Airport



Mail Processing Center  
Federal Aviation Administration  
Southwest Regional Office  
Obstruction Evaluation Group  
2601 Meacham Boulevard  
Fort Worth, TX 76193

Aeronautical Study No.  
2015-AWP-3132-OE

Attachment A4-2

Issued Date: 07/30/2015

Sigrid R Waggener  
Burke Williams & Sorensen LLP  
101 Howard Street Suite 400  
San Francisco, CA 94104

**\*\* PUBLIC NOTICE \*\***

The Federal Aviation Administration is conducting an aeronautical study concerning the following:

Structure:	Building Building C South West Corner
Location:	Millbrae, CA
Latitude:	37-35-59.23N NAD 83
Longitude:	122-23-15.56W
Heights:	27 feet site elevation (SE) 132 feet above ground level (AGL) 159 feet above mean sea level (AMSL)

The structure above exceeds obstruction standards. To determine its effect upon the safe and efficient use of navigable airspace by aircraft and on the operation of air navigation facilities, the FAA is conducting an aeronautical study under the provisions of 49 U.S.C., Section 44718 and, if applicable, Title 14 of the Code of Federal Regulations, part 77.

**\*\* SEE REVERSE SIDE FOR ADDITIONAL INFORMATION \*\***

In the study, consideration will be given to all facts relevant to the effect of the structure on existing and planned airspace use, air navigation facilities, airports, aircraft operations, procedures and minimum flight altitudes, and the air traffic control system.

Interested persons are invited to participate in the aeronautical study by submitting comments to the above FAA address or through the electronic notification system. To be eligible for consideration, comments must be relevant to the effect the structure would have on aviation, must provide sufficient detail to permit a clear understanding, must contain the aeronautical study number printed in the upper right hand corner of this notice, and must be received on or before 09/05/2015.

This notice may be reproduced and circulated by any interested person. Airport managers are encouraged to post this notice.

If we can be of further assistance, please contact our office at (310) 725-6557. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2015-AWP-3132-OE.

Attachment A4-2  
(cont.)

(CIR)

Signature Control No: 245230586-259269382  
Karen McDonald  
Specialist

Attachment(s)  
Part 77  
Map(s)

**Proposal:** To construct a(n) Building to a height of 132 feet above ground level, 159 feet above mean sea level.

**Location:** The structure will be located 1.28 nautical miles southwest of SFO Airport reference point.

**Part 77 Obstruction Standard(s) Exceeded:**

Section 77.17 (a) (3) by 68 feet - a height that increases a minimum instrument flight altitude within a terminal area (TERPS Criteria). The proposal would necessitate At 159 AMSL, SAN FRANCISCO INTL (SFO) CA. Obstacle penetrates RWY 19L Initial Climb Area (ICA) 68 feet Qualifies as low, close-in penetration with climb gradient termination altitude 200 feet or less above DER, requiring TAKE-OFF MINIMUM AND (OBSTACLE) DEPARTURE PROCEDURES NOTE RWY 19L. Obstacle penetrates RWY 19R Initial Climb Area (ICA) 57 feet Qualifies as low, close-in penetration with climb gradient termination altitude 200 feet or less above DER, requiring TAKE-OFF MINIMUM AND (OBSTACLE) DEPARTURE PROCEDURES NOTE RWY 19R,

Section 77.17 (a) (5) a height that affects an Airport Surface by penetrating:

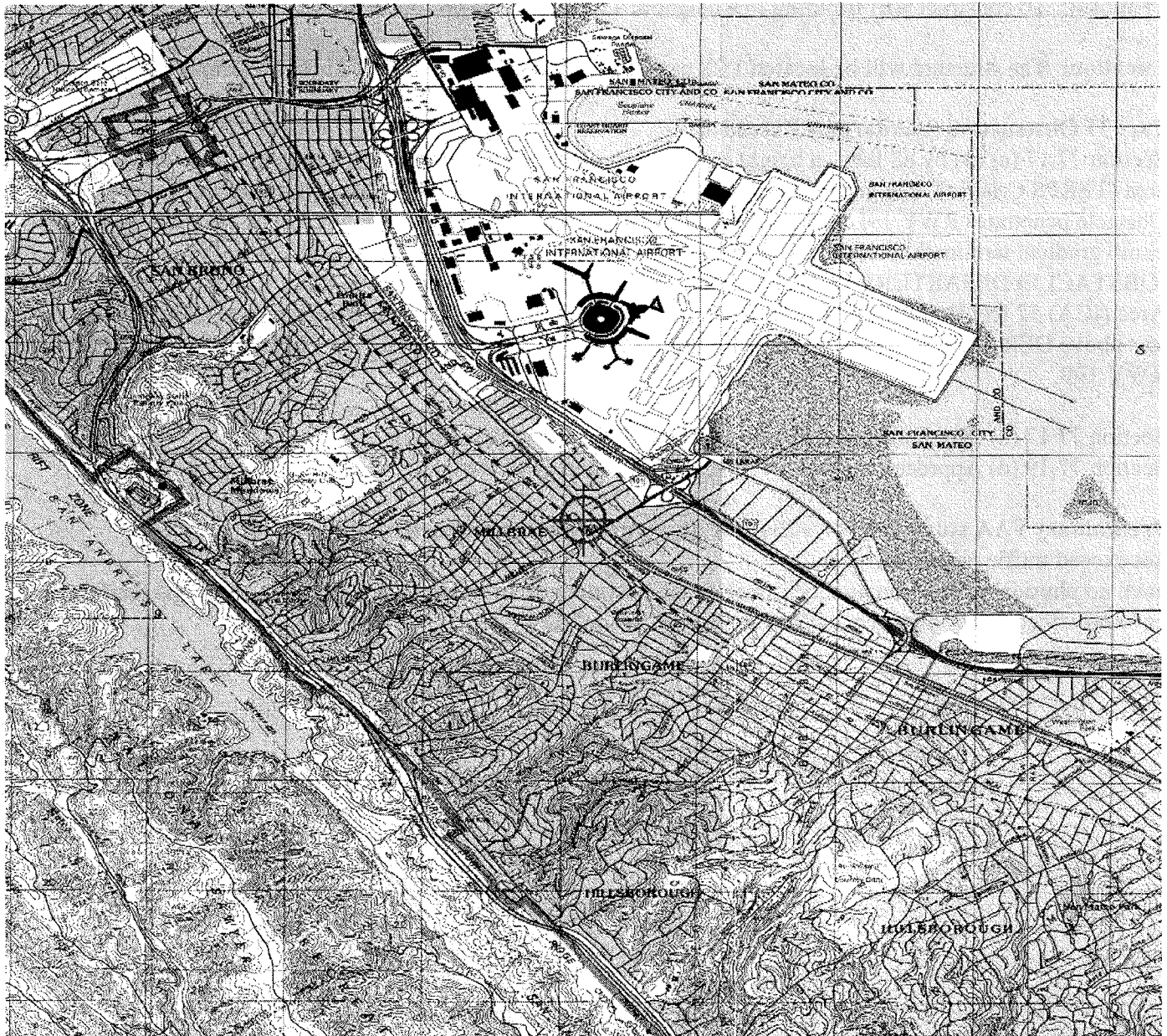
Section 77.19 (d) Approach Surface by 8 feet as applied to SFO.

**Preliminary FAA study indicates that the above mentioned structure would:**

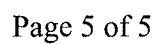
not exceed traffic pattern airspace

have no physical or electromagnetic effect on the operation of air navigation and communications facilities.

have no effect on any airspace and routes used by the military.









Mail Processing Center  
Federal Aviation Administration  
Southwest Regional Office  
Obstruction Evaluation Group  
2601 Meacham Boulevard  
Fort Worth, TX 76193

Issued Date: 07/30/2015

Sigrid R Waggener  
Burke Williams & Sorensen LLP  
101 Howard Street Suite 400  
San Francisco, CA 94104

**\*\* PUBLIC NOTICE \*\***

The Federal Aviation Administration is conducting an aeronautical study concerning the following:

Structure:	Building Building C South East Corner
Location:	Millbrae, CA
Latitude:	37-35-59.99N NAD 83
Longitude:	122-23-14.33W
Heights:	27 feet site elevation (SE) 132 feet above ground level (AGL) 159 feet above mean sea level (AMSL)

The structure above exceeds obstruction standards. To determine its effect upon the safe and efficient use of navigable airspace by aircraft and on the operation of air navigation facilities, the FAA is conducting an aeronautical study under the provisions of 49 U.S.C., Section 44718 and, if applicable, Title 14 of the Code of Federal Regulations, part 77.

**\*\* SEE REVERSE SIDE FOR ADDITIONAL INFORMATION \*\***

In the study, consideration will be given to all facts relevant to the effect of the structure on existing and planned airspace use, air navigation facilities, airports, aircraft operations, procedures and minimum flight altitudes, and the air traffic control system.

Interested persons are invited to participate in the aeronautical study by submitting comments to the above FAA address or through the electronic notification system. To be eligible for consideration, comments must be relevant to the effect the structure would have on aviation, must provide sufficient detail to permit a clear understanding, must contain the aeronautical study number printed in the upper right hand corner of this notice, and must be received on or before 09/05/2015.

This notice may be reproduced and circulated by any interested person. Airport managers are encouraged to post this notice.

If we can be of further assistance, please contact our office at (310) 725-6557. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2015-AWP-3131-OE.

**Signature Control No: 245230585-259267698**

Karen McDonald

Specialist

Attachment(s)

Part 77

Additional Information

Case Description

Map(s)

**Proposal:** To construct a(n) Building to a height of 132 feet above ground level, 159 feet above mean sea level.

**Location:** The structure will be located 1.26 nautical miles southwest of SFO Airport reference point.

**Part 77 Obstruction Standard(s) Exceeded:**

Section 77.17 (a) (3) by 71 feet - a height that increases a minimum instrument flight altitude within a terminal area (TERPS Criteria). The proposal would necessitate At 159 AMSL, SAN FRANCISCO INTL (SFO) CA. Obstacle penetrates RWY 19L Initial Climb Area (ICA) 71 feet Qualifies as low, close-in penetration with climb gradient termination altitude 200 feet or less above DER, requiring TAKE-OFF MINIMUM AND (OBSTACLE) DEPARTURE PROCEDURES NOTE RWY 19L. Obstacle penetrates RWY 19R Initial Climb Area (ICA) 59 feet Qualifies as low, close-in penetration with climb gradient termination altitude 200 feet or less above DER, requiring TAKE-OFF MINIMUM AND (OBSTACLE) DEPARTURE PROCEDURES NOTE RWY 19R

Section 77.17 (a) (5) a height that affects an Airport Surface by penetrating:

Section 77.19 (d) Approach Surface by 14 feet as applied to SFO.

**Preliminary FAA study indicates that the above mentioned structure would:**

have no physical or electromagnetic effect on the operation of air navigation and communications facilities.  
have no effect on any airspace and routes used by the military.

Traffic Pattern Interaction # 1:

Site Type:

Airport

Traffic Pattern Name:

Transitional

Penetration in feet:

10

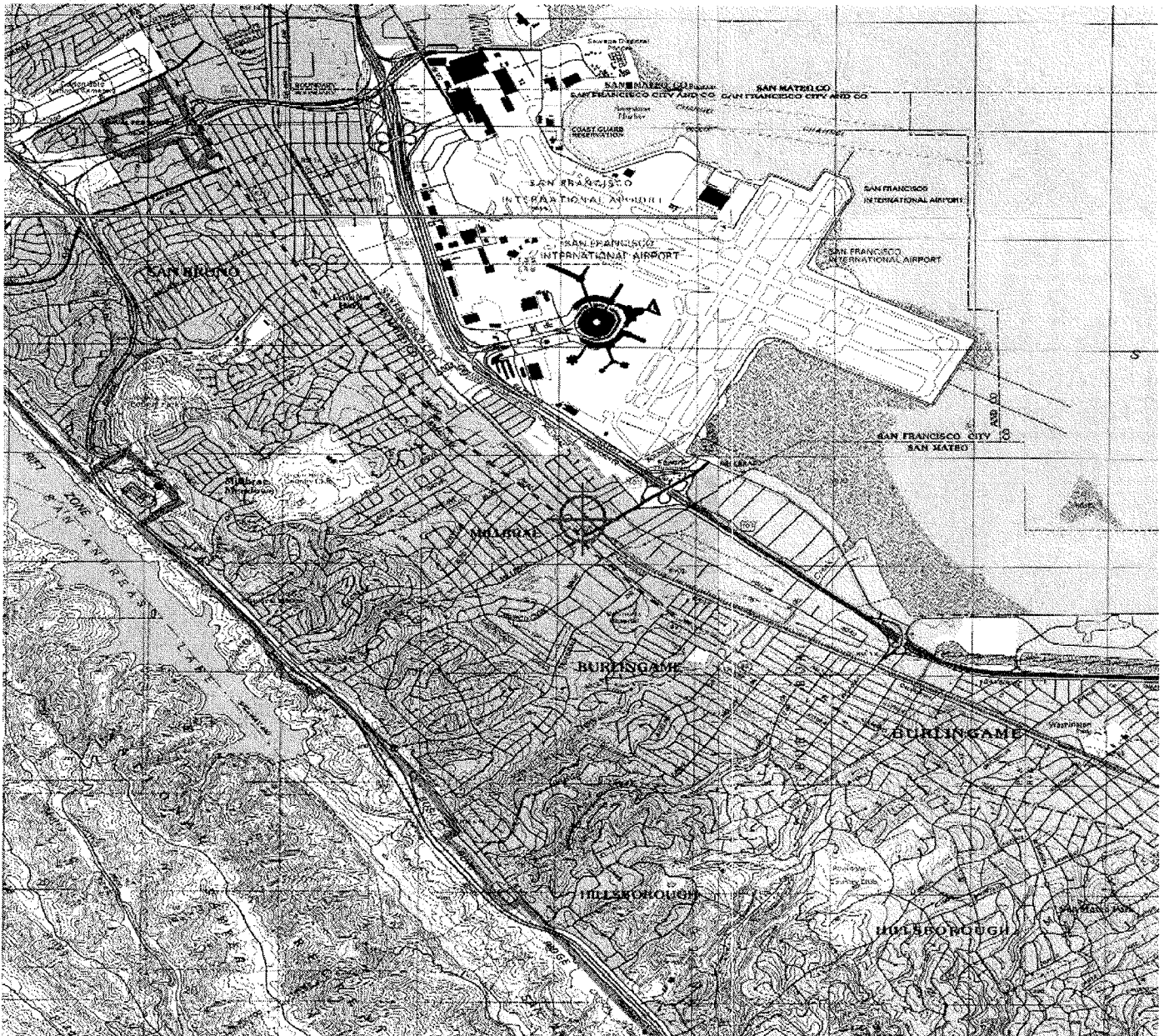
Airport ID:

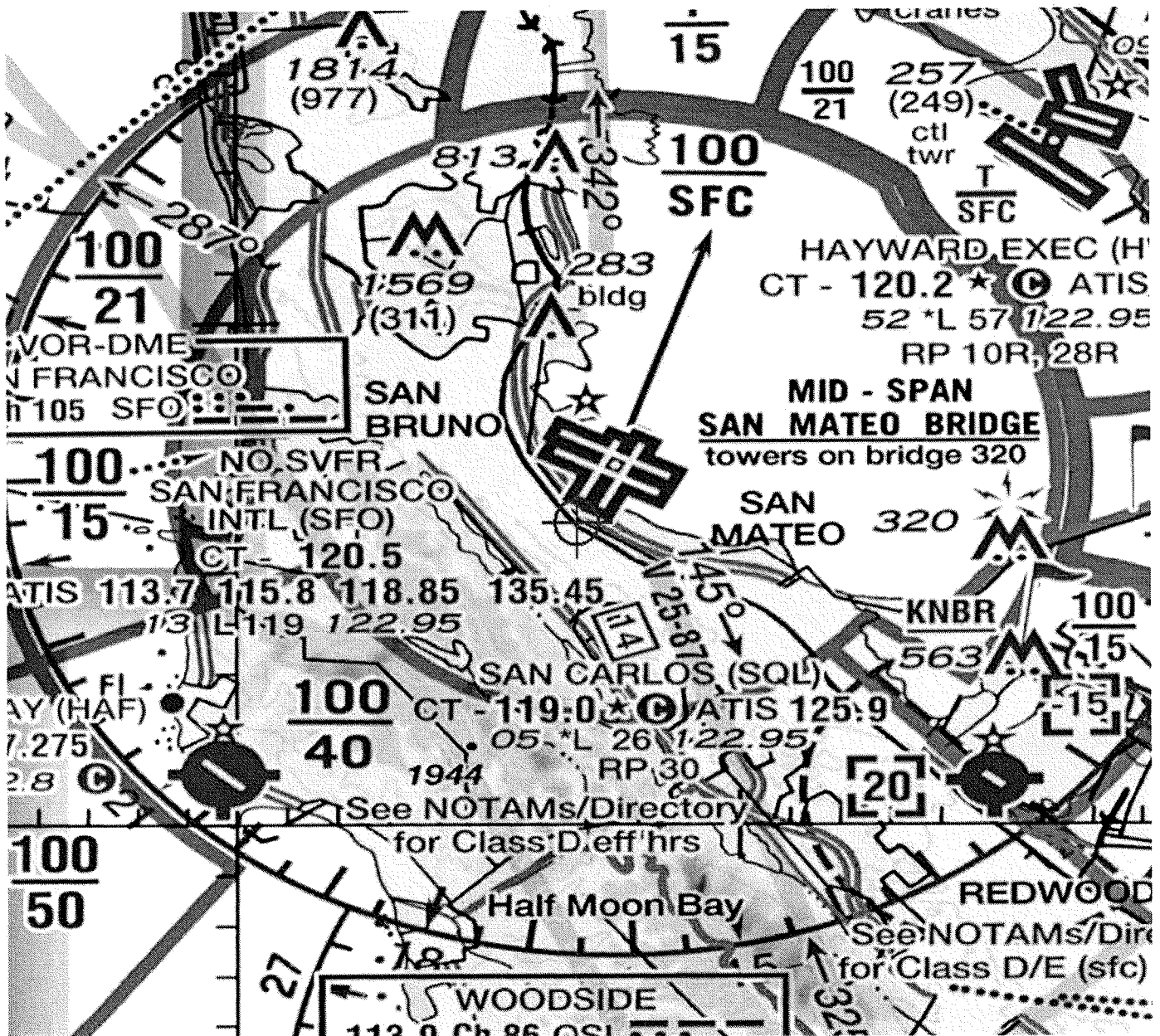
SFO

Runway ID:

01R/19L

Please see exhibits submitted with this application









Mail Processing Center  
Federal Aviation Administration  
Southwest Regional Office  
Obstruction Evaluation Group  
2601 Meacham Boulevard  
Fort Worth, TX 76193

Attachment A4-4  
Aeronautical Study No.  
2015-AWP-3130-OE

Issued Date: 07/30/2015

Sigrid R Waggener  
Burke Williams & Sorensen LLP  
101 Howard Street Suite 400  
San Francisco, CA 94104

**\*\* PUBLIC NOTICE \*\***

The Federal Aviation Administration is conducting an aeronautical study concerning the following:

Structure:	Building Building C North West Corner
Location:	Millbrae, CA
Latitude:	37-36-00.48N NAD 83
Longitude:	122-23-16.80W
Heights:	27 feet site elevation (SE) 132 feet above ground level (AGL) 159 feet above mean sea level (AMSL)

The structure above exceeds obstruction standards. To determine its effect upon the safe and efficient use of navigable airspace by aircraft and on the operation of air navigation facilities, the FAA is conducting an aeronautical study under the provisions of 49 U.S.C., Section 44718 and, if applicable, Title 14 of the Code of Federal Regulations, part 77.

**\*\* SEE REVERSE SIDE FOR ADDITIONAL INFORMATION \*\***

In the study, consideration will be given to all facts relevant to the effect of the structure on existing and planned airspace use, air navigation facilities, airports, aircraft operations, procedures and minimum flight altitudes, and the air traffic control system.

Interested persons are invited to participate in the aeronautical study by submitting comments to the above FAA address or through the electronic notification system. To be eligible for consideration, comments must be relevant to the effect the structure would have on aviation, must provide sufficient detail to permit a clear understanding, must contain the aeronautical study number printed in the upper right hand corner of this notice, and must be received on or before 09/05/2015.

This notice may be reproduced and circulated by any interested person. Airport managers are encouraged to post this notice.

If we can be of further assistance, please contact our office at (310) 725-6557. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2015-AWP-3130-OE.

**Signature Control No: 245230584-259260761**

Karen McDonald

Specialist

( CIR )

Attachment(s)

Part 77

Case Description

Map(s)

**Proposal:** To construct a(n) Building to a height of 132 feet above ground level, 159 feet above mean sea level.

**Location:** The structure will be located 1.27 nautical miles southwest of SFO Airport reference point.

**Part 77 Obstruction Standard(s) Exceeded:**

Section 77.17 (a) (3) by 70 feet - a height that increases a minimum instrument flight altitude within a terminal area (TERPS Criteria). The proposal would necessitate At 159 AMSL, SAN FRANCISCO INTL (SFO) CA. Obstacle penetrates RWY 19L Initial Climb Area (ICA) 70 feet Qualifies as low, close-in penetration with climb gradient termination altitude 200 feet or less above DER, requiring TAKE-OFF MINIMUM AND (OBSTACLE) DEPARTURE PROCEDURES NOTE RWY 19L. Obstacle penetrates RWY 19R Initial Climb Area (ICA) 58 feet Qualifies as low, close-in penetration with climb gradient termination altitude 200 feet or less above DER, requiring TAKE-OFF MINIMUM AND (OBSTACLE) DEPARTURE PROCEDURES NOTE RWY 19R

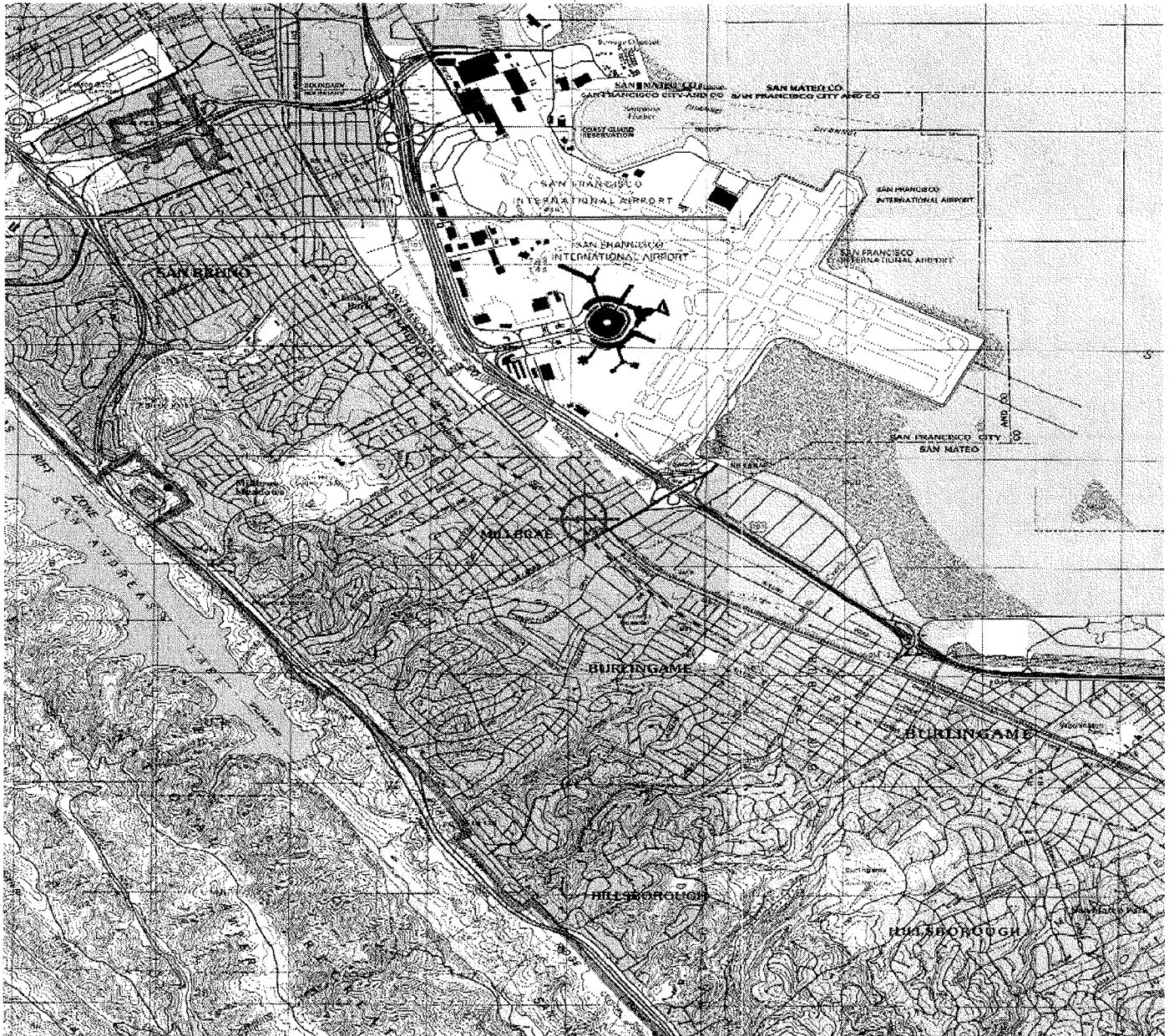
**Preliminary FAA study indicates that the above mentioned structure would:**

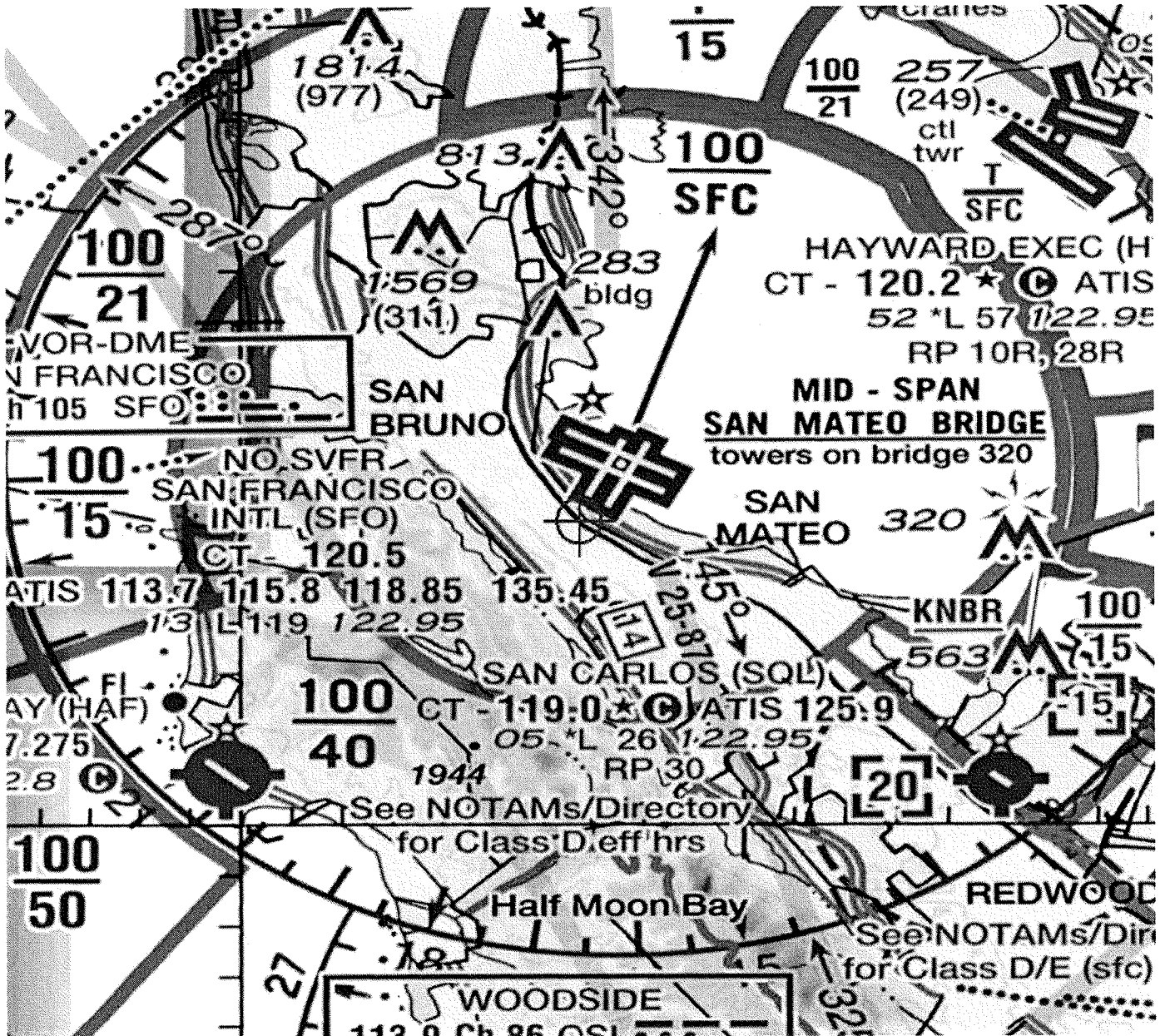
not exceed traffic pattern airspace

have no physical or electromagnetic effect on the operation of air navigation and communications facilities.

have no effect on any airspace and routes used by the military.

Please see exhibits submitted with this application







Mail Processing Center  
Federal Aviation Administration  
Southwest Regional Office  
Obstruction Evaluation Group  
2601 Meacham Boulevard  
Fort Worth, TX 76193

Attachment A4-5  
Aeronautical Study No.  
2015-AWP-3129-OE

Issued Date: 07/30/2015

Sigrid R Waggener  
Burke Williams & Sorensen LLP  
101 Howard Street Suite 400  
San Francisco, CA 94104

**\*\* PUBLIC NOTICE \*\***

The Federal Aviation Administration is conducting an aeronautical study concerning the following:

Structure:	Building Building C North East Corner
Location:	Millbrae, CA
Latitude:	37-36-01.24N NAD 83
Longitude:	122-23-15.58W
Heights:	27 feet site elevation (SE) 132 feet above ground level (AGL) 159 feet above mean sea level (AMSL)

The structure above exceeds obstruction standards. To determine its effect upon the safe and efficient use of navigable airspace by aircraft and on the operation of air navigation facilities, the FAA is conducting an aeronautical study under the provisions of 49 U.S.C., Section 44718 and, if applicable, Title 14 of the Code of Federal Regulations, part 77.

**\*\* SEE REVERSE SIDE FOR ADDITIONAL INFORMATION \*\***

In the study, consideration will be given to all facts relevant to the effect of the structure on existing and planned airspace use, air navigation facilities, airports, aircraft operations, procedures and minimum flight altitudes, and the air traffic control system.

Interested persons are invited to participate in the aeronautical study by submitting comments to the above FAA address or through the electronic notification system. To be eligible for consideration, comments must be relevant to the effect the structure would have on aviation, must provide sufficient detail to permit a clear understanding, must contain the aeronautical study number printed in the upper right hand corner of this notice, and must be received on or before 09/05/2015.

This notice may be reproduced and circulated by any interested person. Airport managers are encouraged to post this notice.

If we can be of further assistance, please contact our office at (310) 725-6557. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2015-AWP-3129-OE.

**Signature Control No: 245230583-259254581**

( CIR )

Karen McDonald  
Specialist

Attachment(s)

Part 77

Additional Information

Case Description

Map(s)



**Proposal:** To construct a(n) Building to a height of 132 feet above ground level, 159 feet above mean sea level.

**Location:** The structure will be located 1.25 nautical miles southwest of SFO Airport reference point.

**Part 77 Obstruction Standard(s) Exceeded:**

Section 77.17 (a) (3) by 73 feet - a height that increases a minimum instrument flight altitude within a terminal area (TERPS Criteria). The proposal would necessitate At 159 AMSL, SAN FRANCISCO INTL (SFO) CA. Obstacle penetrates RWY 19L Initial Climb Area (ICA) 73 feet Qualifies as low, close-in penetration with climb gradient termination altitude 200 feet or less above DER, requiring TAKE-OFF MINIMUM AND (OBSTACLE) DEPARTURE PROCEDURES NOTE RWY 19L. Obstacle penetrates RWY 19R Initial Climb Area (ICA) 61 feet Qualifies as low, close-in penetration with climb gradient termination altitude 200 feet or less above DER, requiring TAKE-OFF MINIMUM AND (OBSTACLE) DEPARTURE PROCEDURES NOTE RWY 19R,

Section 77.17 (a) (5) a height that affects an Airport Surface by penetrating:

Section 77.19 (d) Approach Surface by 5 feet as applied to SFO.

Section 77.19 (e) Transitional Surface by 9 feet as applied to SFO.

**Preliminary FAA study indicates that the above mentioned structure would:**

have no physical or electromagnetic effect on the operation of air navigation and communications facilities.

have no effect on any airspace and routes used by the military.

Traffic Pattern Interaction # 1:

Site Type:

Airport

Traffic Pattern Name:

Approach

Penetration in feet:

4

Airport ID:

SFO

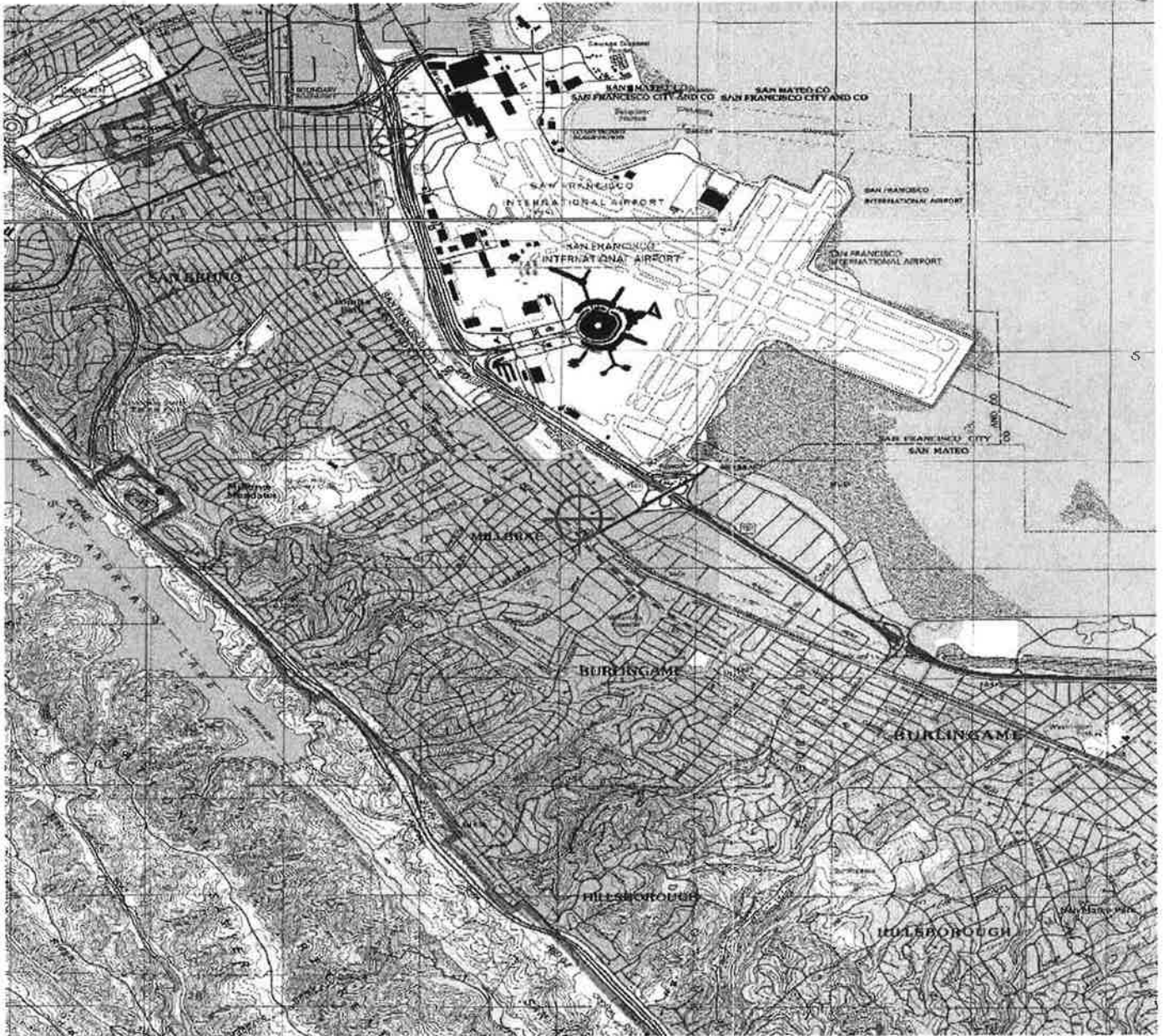
Runway ID:

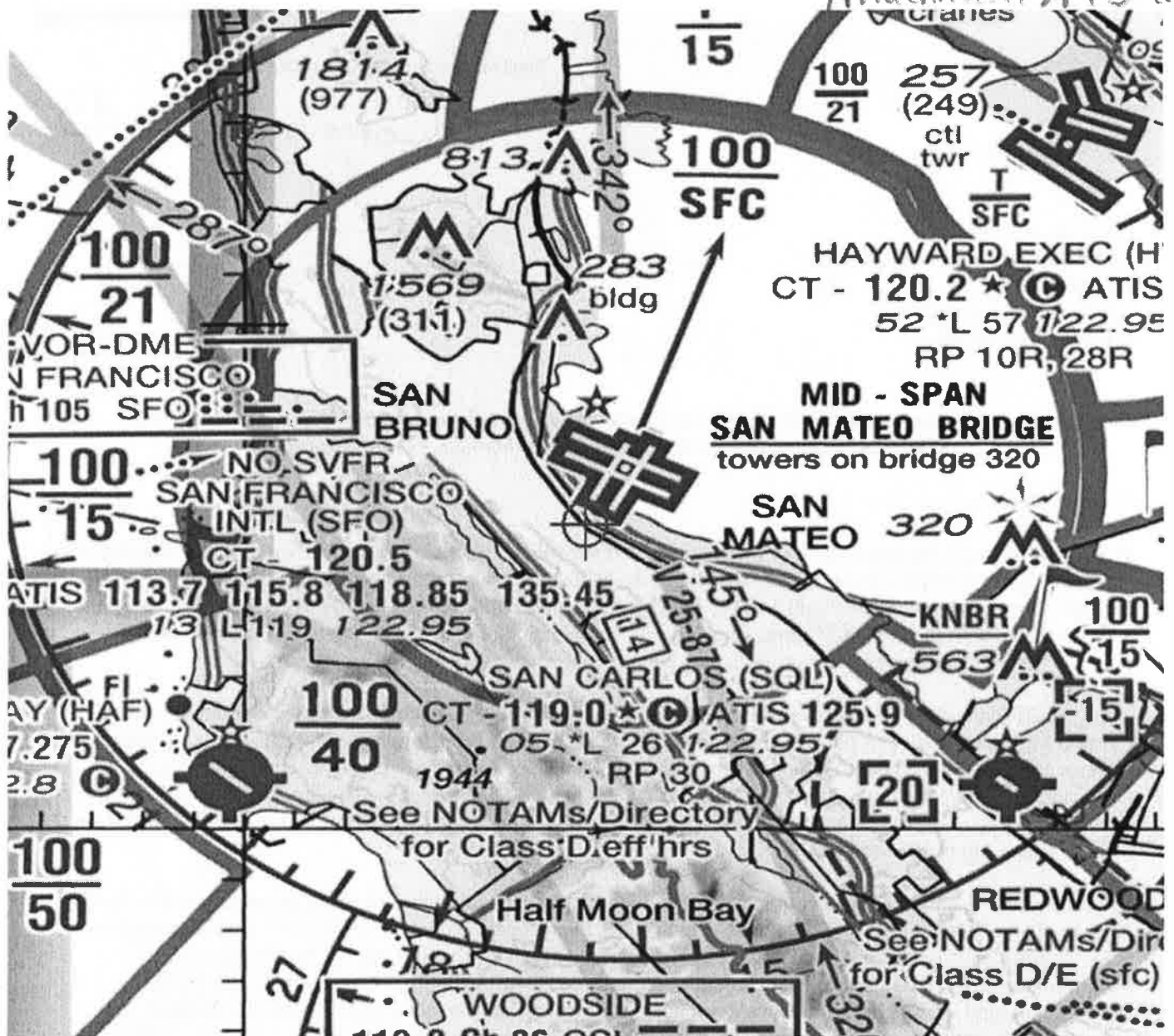
01L/19R

Runway End ID:

01L

Please see exhibits submitted with this application.







San Francisco International Airport

Comment Letter A5

August 6, 2015

Christine di Iorio  
Community Development Director  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030

**Subject:** *Comment letter to the Draft Environmental Impact Report for the Millbrae Station Area Specific Plan Update and Transit-Oriented Development #1 and #2 projects*

Dear Ms. di Iorio,

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.

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.

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. 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 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.

A5-1

A5-2

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

EDWIN M. LEE  
MAYOR

LARRY MAZZOLA  
PRESIDENT

LINDA S. CRAYTON  
VICE PRESIDENT

ELEANOR JOHNS

RICHARD J. GUGGENHIME

PETER A. STERN

JOHN L. MARTIN  
AIRPORT DIRECTOR

### Height Limits

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). 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.

A5-3

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.

### DEIR Analysis

#### *Land Use and Planning*

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 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.

A5-4

#### *Hazards and Hazardous Materials*

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 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.

A5-5

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 ALCUP 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.

A5-5  
(cont.)

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 21670<sup>1</sup>. 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.

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 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.

#### *Traffic*

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.

A5-6

#### *Noise*

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 65-70db 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.

A5-7

<sup>1</sup> "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)



*Lower Intensity Alternatives for the TOD #1 Project and the Specific Plan Update*

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.

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. A5-8

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.

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](mailto:john.bergener@flysfso.com). A5-9

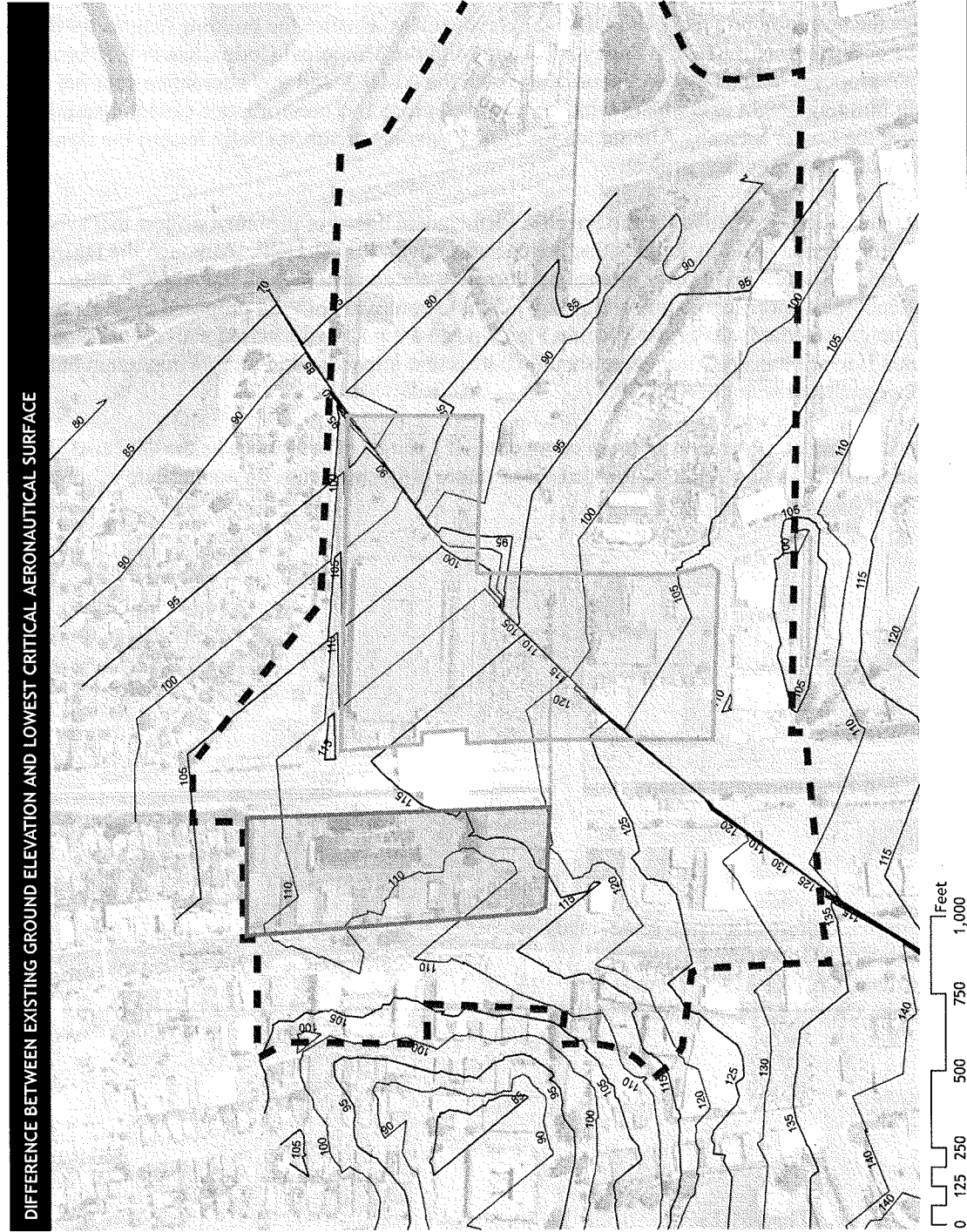
Sincerely,



John Bergener  
Planning Director  
Bureau of Planning and Environmental Affairs

Attachment

cc: Philip Crimmins, Caltrans Division of Aeronautics  
Sandy Wong, C/CAG Executive Director  
Tom Magdalena, C/CAG ALUC Planner  
Rich Newman, City of Millbrae Liaison to SFO



DIFFERENCE BETWEEN EXISTING GROUND ELEVATION AND LOWEST CRITICAL AERONAUTICAL SURFACE

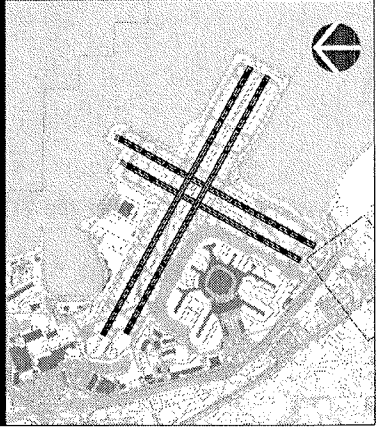
LEGEND

Difference Contours  
 Every 5 feet  
 Every 10 feet

Millbrae Station Area Specific Plan

Specific Plan Boundary  
 TOD#1 Site  
 TOD#2 Site

AREA OF DETAIL



SOURCES: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community; FAA DE/AAA; Millbrae Station Area Specific Plan Update draft; SFO Bureau of Planning and Environmental Affairs, July 2015.

FIGURE 1  
 Comparison of Existing Ground Elevation and Critical Air Surface  
 Airport Land Use Compatibility Analysis  
 San Francisco International Airport



## Housing Leadership Council of San Mateo County

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Comment Letter A6

August 6, 2015

Deborah Nelson, Community Development Director  
Marty VanDuy, Community Development Project Manager  
Christine Di Iorio, Planner  
621 Magnolia Avenue,  
Millbrae, CA 94030

### Re: City of Millbrae - MSASP DEIR Comment Letter

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.

A6-1

Please consider the following comments in response to the Draft EIR, released on June 30, 2015.

#### Section 4.11

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.

A6-2

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."

A6-3

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

A6-4

AG-4  
(cont.)

residents through increased rents and evictions, which clearly have adverse effects, including on human health, that makes displacement a significant impact.

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.

AG-5

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.

AG-6

I appreciate your consideration of these comments and look forward to continued discussions with staff and City Council through the MSASP update process.

AG-7

Sincerely,



Tracy Choi  
Community Builder  
Housing Leadership Council of San Mateo County

**From:** Preston, Guy@HSR [mailto:Guy.Preston@hsr.ca.gov]  
**Sent:** Friday, August 07, 2015 11:11 AM  
**To:** Christi Diiorio <CDiiorio@ci.millbrae.ca.us>  
**Cc:** Tripousis, Ben@HSR <Ben.Tripousis@hsr.ca.gov>  
**Subject:** Specific Plan Update, and TOD #1, and TOD #2 EIR  
**Importance:** High

Christine:

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.

A7-1

Thank you,

Guy Preston, PE  
Project Manager  
California High-Speed Rail Authority  
Northern Region  
100 Paseo de San Antonio, #206  
San Jose, CA 95113  
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# CALIFORNIA High-Speed Rail Authority

Northern California Regional Office

August 6, 2015

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Ms. Christine di Iorio  
Community Development Director  
Millbrae Community Development Department  
621 Magnolia Avenue  
Millbrae, CA 94030

Dear Ms. di Iorio:

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 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.

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.

The MSASP can realize a vital opportunity by creating a shared vision for a regionally significant station that incorporates the Phase I blended Caltrain/HSR system at the Millbrae Station. The Authority is committing staffing resources to be engaged in this effort. This letter highlights the potential benefits as well urban design considerations that we believe are not currently recognized in the MSASP and presents comments on the Draft EIR analysis. Key EIR comments address the importance of incorporating HSR ridership data into the EIR analysis for projecting future ridership and parking demand at the Millbrae Station.

EDMUNDO G. BROWN JR.

GOVERNOR



<sup>1</sup> 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-speed rail at Millbrae Station and other connecting stations.

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.

### Project Description

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:
  - 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.
  - 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.
  - c. **Efficient Station Access.** The vision prioritizes efficient regional access to minimize travel time and local access to support transit-oriented development.
  - d. **Point of Arrival to Explore California.** The Millbrae station is the transfer point 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.
  - e. **Clean Mobility.** HSR is a new, energy efficient, environmentally beneficial travel option that supports sustainable economic and population growth.
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.
  - a. **Area 1 Northwest Quadrant TOD #1.** To provide space for station access to the station, the Authority recommends maintaining the 1998 MSASP Policy *CIRC-2.1 Extend California Drive from Linden Lane north to El Camino Real at Victoria Avenue*. 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.
  - 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.
3. **Multimodal Access.** The MSASP should consider HSR station access routes and evaluate 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.

A7-3

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.

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.

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.

A7-3  
(cont.)

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.

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.

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.

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.

### Environmental Analysis

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.

A7-4

- a. The Draft EIR on Page 1-1 notes that that the "Draft EIR compares the buildout potential<sup>1</sup> of the Specific Plan Area and the development of the proposed TOD #1 and TOD #2 projects with the existing baseline condition..."

A7-5

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.



- 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. A7-6
- 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. A7-7
- 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. A7-8
- 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. A7-9
- 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. A7-10
  - 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. A7-11
  - 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. A7-12
  - 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. A7-13

- 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. A7-14
- 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. A7-15
- 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. A7-16
  - 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. A7-17

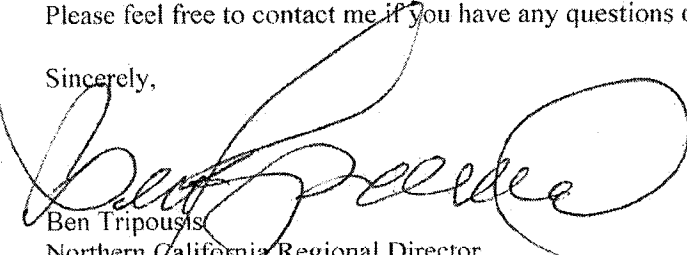
### Conclusions

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 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. A7-18

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.

Please feel free to contact me if you have any questions or concerns.

Sincerely,



Ben Tripousis  
Northern California Regional Director  
California High-Speed Rail Authority  
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ben.tripousis@hsr.ca.gov



**SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT**

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Comment Letter A8

2015

Thomas M. Blalock, P.E.  
PRESIDENT

Tom Radulovich  
VICE PRESIDENT

Grace Crunican  
GENERAL MANAGER

Ms. Christine di Iorio  
Community Development Director  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030

August 7, 2015

RE: Comments on Draft Environmental Impact Report for Millbrae Station Area  
Specific Plan Update and Transit-oriented Development #1 and #2

**DIRECTORS**

Gail Murray  
1ST DISTRICT

Joel Keller  
2ND DISTRICT

Rebecca Saltzman  
3RD DISTRICT

Robert Raburn, Ph.D.  
4TH DISTRICT

John McPartland  
5TH DISTRICT

Thomas M. Blalock, P.E.  
6TH DISTRICT

Zakary Mallett, MCP  
7TH DISTRICT

Nicholas Josefowitz  
8TH DISTRICT

Tom Radulovich  
9TH DISTRICT

Dear Ms. di Iorio,

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.

A8-1

After review of the draft environmental document, we have the following comments.

Transportation and Circulation

**COMMENT 1:**

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.

A8-2

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:

A8-3

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.

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.

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 MM TRANS-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 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).

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.

#### COMMENT 2

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-CP16 would require significant demolition and reconstruction of the BART 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.

A8-4

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.

A8-5

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 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.

A8-6

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.

A8-7

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.

A8-8

Given the foregoing, the Specific Plan Update must be revised to delete P-CP16, or the DEIR must be augmented, revised, and recirculated to assess and mitigate the unexamined impacts discussed herein.

A8-9

#### 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 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.

A8-10

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 reasonably 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.

A8-11

#### Corrections and additions for the DEIR

For the Final EIR, please consider the following modification, and make these corrections.

A8-12

- 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.
- 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).

A8-13

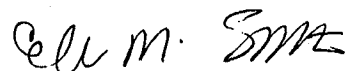
A8-14

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.

A8-15

Please do not hesitate to contact me for any reason.

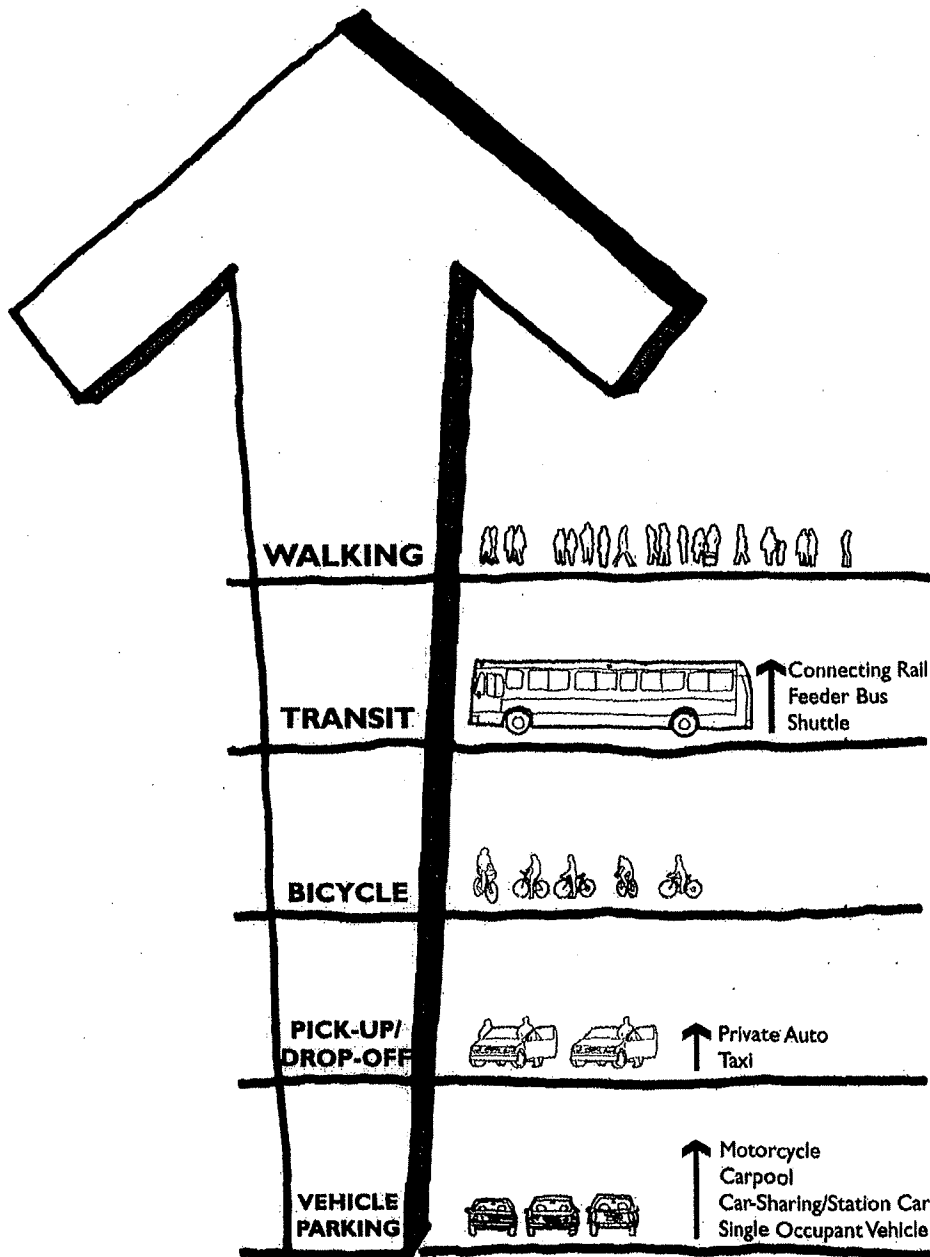
Ellen M. Smith

Handwritten signature of Ellen M. Smith in cursive.

Manager, Strategic and Policy Planning  
510.287.4758  
[esmith1@bart.gov](mailto:esmith1@bart.gov)

cc: Marcia Raines

EXHIBIT A  
BART ACCESS HIERARCHY  
in use since 2003





# Comment Letter A9

**From:** Laura Thompson [mailto:LauraT@abag.ca.gov]

**Sent:** Monday, August 10, 2015 4:40 PM

**To:** Christi DiIorio <CDiIorio@ci.millbrae.ca.us>

**Subject:** San Francisco Bay Trail Comments: Millbrae Station Area Specific Plan & TOD #1 / TOD #2 DEIR

Hi Christine,

Attached are comments on this Draft EIR from the San Francisco Bay Trail Project. Please let me know if you have any questions.

A9-1

Thanks,  
Laura

Laura Thompson  
Bay Trail Project Manager  
Association of Bay Area Governments  
101 Eighth Street  
Oakland, CA 94607  
p. 510-464-7935  
f. 510-433-5535  
laurat@abag.ca.gov  
www.baytrail.org



August 10, 2015

Christine di Iorio  
Community Development Director  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030

**Subject: Millbrae Station Area Specific Plan Update and Transit-Oriented Development #1 and #2 Draft Environmental Impact Report**

Dear Ms. di Iorio:

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.

A9-2

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.

**Millbrae Station Area Specific Plan (MSASP)**

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:

A9-3

*Strengthen the pedestrian and bicycle policies to support current and future needs.*

The new development proposals TOD #1 and TOD #2 should be held to the following specific plan policy:

*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 as a whole. Projects will need to set aside space to accommodate publicly accessible pedestrian and bicycle pathways.*

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 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.

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.

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.

#### Streetscape Standards: Aviator Avenue, page 7.29

The facility proposal for the Bay Trail along Aviator is clear in the specific plan:

*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.*

#### Missing Streetscape Standards

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.

A9-3  
(cont.)

A9-4

**TOD #1 and TOD #2**

**Figure 3-35 TOD#2 Pedestrian and Bicycle Plan**

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.

A9-5

**Page 4-13-135 TOD#2 Bicycle and Pedestrian Facilities**

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.

A9-6

**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.**

A9-7

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

A9-8

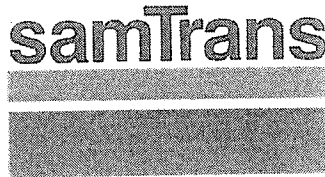
Sincerely,

*Laura Thompson*

Laura Thompson  
Bay Trail Project Manager

SHIRLEY HARRIS, CHAIR  
ZOE KERSTEEN-TUCKER, VICE CHAIR  
JEFF GEE  
PETER RATTO  
CAROLE GROOM  
ROSE GUILBAULT  
CHARLES STONE  
KARYL MATSUMOTO  
ADRIENNE TISSIER

JIM HARTNETT  
GENERAL MANAGER/CEO



August 10, 2015

Ms. Christine di Lorio  
Community Development Director  
Community Development Department  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030

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

Dear Ms. di Lorio,

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.

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.

A10-1

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.

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.

**SAN MATEO COUNTY TRANSIT DISTRICT**  
1250 San Carlos Ave. – P.O. Box 3006  
San Carlos, CA 94070-1306 (650)508-6200

#### MSASP PROGRAMMATIC DEIR

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.

A10-2

The MSASP embodies the type of compact, mixed-use, transit-supportive, and people-friendly development and improvements supported by SamTrans and its mobility initiatives.

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 ½ 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).

A10-3

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.

A10-4

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.

A10-5

#### TOD #1 – PROJECT-LEVEL DEIR

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.

A10-6

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.

A10-6  
(cont.)

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.

A10-7

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.

A10-8

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.

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.

A10-9

## **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.

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.

A10-10

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.

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:

- 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 itself (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.

A10-11

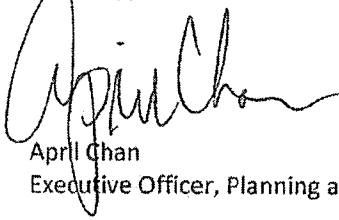
SamTrans also has some concerns regarding the methodology used for traffic forecasts associated with this project given the inconsistencies between different site plans and circulation patterns. We believe a holistic approach to pedestrian, transit, shuttle, and bicycle access to the site will serve as a "win-win" to effectively reduce private vehicle trips through the site.

A10-12

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 transit hub.

A10-13

Sincerely,



April Chan  
Executive Officer, Planning and Development

cc: J. Harnett  
C. Harvey  
M. Simon





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JIM HARTNETT  
EXECUTIVE DIRECTOR

JPB-2050-LTO-MLBR-001

August 10, 2015

Ms. Christine Di Lorio  
Community Development Director  
Community Development Department  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030

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

Dear Ms. Di Lorio:

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.

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.

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.

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.

A11-1

A11-2

PENINSULA CORRIDOR JOINT POWERS BOARD  
1250 San Carlos Ave. - P.O. Box 3006  
San Carlos, CA 94070-1306 650.508.6269

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 sufficient and robust to support planned future transit services and development.

AI-2  
(cont.)

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](mailto:leem@samtrans.com). We look forward to continuing our work with you on this important effort.

AI-3

Sincerely,



Sebastian Petty on behalf of Marian Lee  
Executive Officer, Caltrain Modernization Program

Ec: Jim Hartnett  
Chuck Harvey  
Jill Gibson  
April Chan  
Hilda Lafebre  
Mark Simon

## C/CAG

CITY/COUNTY ASSOCIATION OF GOVERNMENTS  
OF SAN MATEO COUNTY

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August 10, 2015

Christine di Iorio  
Community Development Department  
City of Millbrae  
621 Magnolia Ave.  
Millbrae, CA 94030

RE: Millbrae Station Area Specific Plan Update and Transit-Oriented Development (TOD) #1  
and #2 projects

Dear Ms. di Iorio:

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.

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.

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 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.

A12-1

# C/CAG

## CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

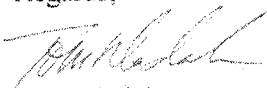
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Millbrae • Pacifica • Portola Valley • Redwood City • San Bruno • San Carlos • San Mateo • San Mateo County • South San Francisco • Woodside*

Ms. di Iorio  
August 10, 2015  
Page 2 of 2

Please contact me if you have any questions regarding the Airport Land Use Compatibility Plan consistency review process.

112-2

Regards,



Tom Madalena  
650-599-1460  
[tmadalena@smcgov.org](mailto:tmadalena@smcgov.org)

cc. John Bergener, San Francisco International Airport  
Philip Crimmins, Caltrans Division of Aeronautics

Comment Letter A13

**From:** Jasneet Sharma [mailto:jsharma@smcgov.org]

**Sent:** Monday, August 10, 2015 4:36 PM

**To:** Christi DiIorio <CDiIorio@ci.millbrae.ca.us>; Soyeb Palya <SPalya@ci.millbrae.ca.us>

**Subject:** MSASP DEIR Comment Letter

Dear Ms. di Iorio, Community Development Director

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.

A13-1

Thank you

Jasneet

---

**Jasneet Sharma**

Senior Community Health Planner  
Health Policy and Planning Program  
San Mateo County Health System  
225 37th Avenue, Room 300  
San Mateo, CA 94403  
650.573.2208  
jsharma@smcgov.org

Get Healthy San Mateo County: [www.GetHealthySMC.org](http://www.GetHealthySMC.org)

Get Healthy San Mateo County: [www.GetHealthySMC.org](http://www.GetHealthySMC.org)

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August 10, 2015

Christine di Iorio, Community Development Director  
Community Development Department  
City of Millbrae  
Via email: [cdiorio@ci.millbrae.ca.us](mailto:cdiorio@ci.millbrae.ca.us)  
[MillbraeMSASPDEIR@ci.millbrae.ca.us](mailto:MillbraeMSASPDEIR@ci.millbrae.ca.us)

**Re: Comment letter for Millbrae Station Area Specific Plan (MSASP) and Draft Environmental Impact Assessment Report (DEIR)**

Dear Ms. di Iorio

We appreciate the opportunity to comment on the Millbrae Station Area Specific Plan and Millbrae Station Area Draft Environmental Impact Report (DEIR).

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.

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 Station Area Specific Plan.

### **Population and Housing**

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.

<sup>1</sup> "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](http://www.nhc.org/media/files/Insights_HousingAndHealthBrief.pdf)



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. *Housing Opportunity Areas are locations where the City has committed to make special efforts to provide affordable housing consistent with other General Plan policies.*

A13-3  
(cont.)

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.<sup>2</sup> 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.

**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.**

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 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.

A13-4

The DEIR and the MSASP have not examined or included information about the

- 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

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.

**Recommendation: The DEIR should analyze the Socio-Economic Impacts caused by vulnerability of displacement of existing residents.**

**II. The DEIR does not analyze the environmental impacts caused by displacement of small businesses.**

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.<sup>3 4</sup> Also, small business owners tend to live locally and therefore spend earnings locally, supporting a strong local economy.

A13-5

<sup>2</sup> Millbrae 2015-2022 Housing Element

<sup>3</sup> Feinstein, J. (1993). The Relationship Between Socioeconomic Status and Health: A Review of the Literature. Milbank Quarterly, 71, 279-322.

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. Retail vacancy rates are very low in Millbrae and available spaces are unlikely to remain vacant for long."

"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.

**Recommendations: The DEIR should:**

1. Analyze and mitigate the direct construction impacts on *small businesses*
2. Analyze and mitigate the negative impacts of socio-economic displacement of small business.

**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**

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.

- a. The Plan lacks the specificity and implementation tools to ensure that affordable units for all income levels are effectively produced, or targeted to meet the City's Regional Housing Need Allocation.

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: "*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*". 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 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 (See Table 1 for more details).

**Table 1: 2007-2014 Millbrae RHNA<sup>5</sup>**

Type of Housing	RHNA (2007- 2014)	Units built (2007-2014)
Very low income	103	1
Low income	74	2
Moderate income	87	18
Above moderate	188	407
Total	428	452

<sup>4</sup> Yen H & Syme L. (1999). The Social Environment and Health: A Discussion of the Epidemiologic Literature. Annual Review of Public Health, 20, 287-308.

<sup>5</sup> City of Millbrae Housing Element, 2015-2023



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 (*See Table 2*). Inclusion of specific targets would be in line with the City's 2015-2022 Housing Element policy (*HIP-18*) to "encourage housing development, including a below-market allocation that maximizes production of very low income units" in Housing Opportunity Areas i.e. the Millbrae Station Area.

**Table 2: 2014-2022 Millbrae RHNA**

Type of Housing	Millbrae RHNA (2015- 2023) <sup>6</sup>	% of total
Extremely low income	96	14.4%
Very low income	97	14.5%
Low income	101	15.2%
Moderate income	112	16.8%
Above moderate	257	38.7%
Total	633	100%

A13-8  
(cont.)

**Recommendations: The Draft Plan should be amended to**

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.
  - a. Policies to **protect** residents from displacement in non-deed restricted housing through Rent Stabilization and Just Cause Evictions policies
  - b. Policies to support **preservation** include No Net Loss Policy for Affordable Housing and Right to Return policy for displaced residents.
  - c. Potential policies for **production** of new affordable housing units are as follows:
    - Establish affordable housing unit targets by income level for the Plan Area to meet income level targets as set out in the 2015-2023 RHNA (*See Table 2 for details*).
    - Consider creating tiers for the current inclusionary zoning policies, 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.
    - Since it is currently illegal to require inclusionary units for rental units, the city should adopt an affordable housing and commercial linkage impact fee on new residential and non-residential development 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.<sup>7</sup>
    - Apply City of Millbrae's Housing Element policy (HIP-32) to promote production of "Affordable Housing Development on City-Owned and Other Agency-Owned Land" to the Millbrae Station Area, where BART-owned land offers the opportunity to collocate 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.

A13-9

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A13-13

A13-14

A13-15

<sup>6</sup> City of Millbrae Housing Element, 2015-2023

<sup>7</sup> [file:///C:/Users/jsharma/Desktop/Public%20Draft%20Model%20Commercial%20Nexus%205\\_12\\_15.pdf](file:///C:/Users/jsharma/Desktop/Public%20Draft%20Model%20Commercial%20Nexus%205_12_15.pdf) and [file:///C:/Users/jsharma/Desktop/Public%20Draft%20Model%20Residential%20Report\\_5\\_12\\_15.pdf](file:///C:/Users/jsharma/Desktop/Public%20Draft%20Model%20Residential%20Report_5_12_15.pdf)

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

## **TRANSPORTATION**

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 disadvantaged groups and 4) reducing respiratory illnesses through improving environmental quality by reducing air pollution and greenhouse gas emissions.

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 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 5<sup>th</sup> most dangerous intersection in the county.<sup>8</sup>

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.

### **Recommendations: The Draft Plan should be amended to**

1. Conduct and include a traffic analysis to determine the feasibility of:
  - 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.  
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.<sup>9</sup>
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.<sup>10</sup>
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.

<sup>8</sup> Preliminary results from the San Mateo County Collision Report

<sup>9</sup> 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>

<sup>10</sup> <http://www.samtrans.com/Assets/Existing+Conditions.pdf>

- a. Long crossing distances and multi-lane roadways dramatically increase crash risk.<sup>11</sup> 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. A13-21
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. A13-22
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.
- 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 than 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. A13-23

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. A13-24

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.

Please contact Jasneet Sharma, Senior Community Health Planner at [jsharma@smcgov.org](mailto:jsharma@smcgov.org) or 650.573.2208 for questions or additional information.

Sincerely,



Sara T. L. Mayer

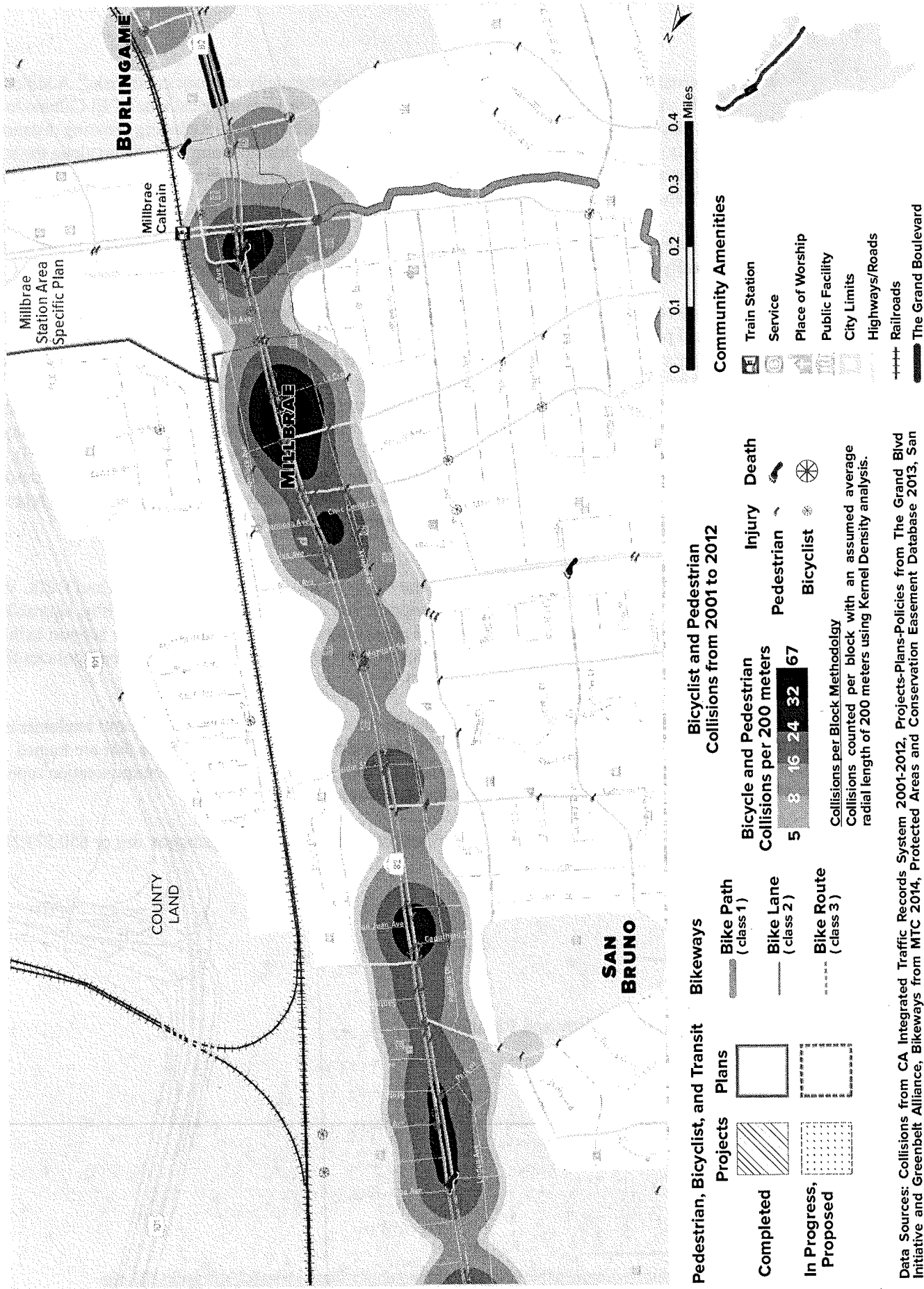
Director of Public Health, Policy and Planning

<sup>11</sup> [http://www.fhwa.dot.gov/environment/bicycle\\_pedestrian/publications/sidewalk2/sidewalks208.cfm](http://www.fhwa.dot.gov/environment/bicycle_pedestrian/publications/sidewalk2/sidewalks208.cfm)

# MILLBRAE GRAND BOULEVARD

## HOT SPOT ANALYSIS: PEDESTRIAN AND BICYCLIST COLLISIONS 2001-2012

Attachment A13-1



Data Sources: Collisions from CA Integrated Traffic Records System 2001-2012, Projects-Plans-Policies from The Grand Blvd Initiative and Greenbelt Alliance, Bikeways from MTC 2014, Protected Areas and Conservation Easement Database 2013, San Mateo County Service Locations, Points of Interest from MapCruzin.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 4

111 GRAND AVENUE

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OAKLAND, CA 94623-0660

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*Serious Drought.  
Help save water!**Comment Letter A14*

August 6, 2015

SMVar025

SCH# 2014092061

Ms. Christine di Iorio  
City of Millbrae  
Community Development Department  
621 Magnolia Avenue  
Millbrae, CA 94030

Dear Ms. di Iorio:

**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).

*A14-1****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.

*A14-2****Cultural Resources***

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 monitory is not appropriate mitigation prior to evaluation of a resource. CEQA Guidelines 15126.4(b)(3) provides a discussion for archaeological mitigation.

*A14-3*

Ms. Christine di Iorio/City of Millbrae  
August 6, 2015  
Page 2

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, 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.

***Encroachment Permit***

Work that encroaches onto the state ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating the state ROW must be submitted to: 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/permits/>.

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

Sincerely,

*Pat C.*

PATRICIA MAURICE  
District Branch Chief  
Local Development – Intergovernmental Review

c: State Clearinghouse

June 30, 2015, Millbrae, California

1           DAVID CRABBE: My name is David Crabbe. I  
2 represent the Sierra Club Sustainable Land Use  
3 Committee.

4           We have just begun to review this massive  
5 document that you have -- very complicated. And it  
6 seems to be a lot of good things in the visions and the  
7 goals of the project -- of the thing, but the truth was  
8 in the details just how this all comes together.

9           And we respectfully ask that the comment period  
10 be extended to 75 to 90 days to give the public a real  
11 opportunity to get into the nuts and bolts of this  
12 document. Thank you.

13           MAYOR GOTTSCHALK: Anyone else on the Specific  
14 Plan Update?

15           I'm told these are on the EIR.

16           BETH ANDERSON: I wanted to say something about  
17 the Specific Plan.

18           MAYOR GOTTSCHALK: Please do. Beth Anderson.

19           BETH ANDERSON: Beth Anderson, 1208 Frontera  
20 Way, Millbrae. I think the plan overall looks very  
21 good. I'm interested to see the implementations of it.

22           I have one question, and that is about parking.  
23 You have taken away some BART parking, which we really  
24 badly need. And I, for one, don't live within walking  
25 distance to BART. So SamTrans does not provide us any

B1-1

B1-2

1 transportation, so how are we going to get from our  
2 homes to take BART if there is no parking and no  
3 transit? That's my question.

4 MAYOR GOTTSCHALK: Thank you.

5 Josie Territo.

6 JOSIE TERRITO: Hi. I'm Josie Territo, and I  
7 live at 640 Taylor Boulevard.

8 My question partly is parking as well. I don't  
9 know how many of you that are not Millbrae residents  
10 consistently drive up and down Millbrae Avenue  
11 specifically from the freeway up to El Camino Real. We  
12 are already impacted with traffic. We cannot take any  
13 more traffic. We cannot take an entrance into some  
14 galleria that's housing multiple businesses without  
15 impacting our families here.

16 My other comment is you kind of glossed over  
17 the noise. Those people that live behind there all own  
18 homes. They all have children. When you dig up the  
19 area, what are you going to do for them to protect them  
20 from any kind of asbestos or anything else that's in the  
21 ground? And the noise level has got to be unbearable.

22 My other comment, and I am almost embarrassed  
23 to say this, but with the restaurant Tai Wu was such a  
24 fiasco with the Planning Department, I am reluctant to  
25 even say I would want this project in Millbrae, because

B1-2  
(cont.)

B1-3

B1-4

B1-5



1 I feel that it was a real poorly -- a very poor project  
2 done by the Planning Department. Too many problems, too  
3 many issues. Thank you.

4 MAYOR GOTTSCHALK: Bill Williams.

5 BILL WILLIAMS: Good evening. My name is Bill  
6 Williams. I live in Burlingame and commute through the  
7 Millbrae station every day. Right now I drive most of  
8 the time. I have tried biking, right now it's just not  
9 safe to bike. I've tried walking. It's just too far.  
10 I've tried riding the bus. There is no bus that goes  
11 there.

12 My comment would be that the 70 percent car  
13 parking or car access to this area is sort of a  
14 self-fulfilling prophecy unless we place a strong  
15 emphasis on increasing transit service, making bike  
16 lines that are safe to ride in, hopefully protected bike  
17 lanes in accordance with the latest national road design  
18 standards, and ensure that bike lanes and sidewalks are  
19 comprehensive and connect not only the Station Area but  
20 to neighboring communities. Thank you.

21 MAYOR GOTTSCHALK: Elizabeth Rider.

22 ELIZABETH RIDER: Thank you. Elizabeth Rider.  
23 I speak for my mother also, Barbara Rogers, 219 Beverly  
24 Avenue.

25 The Millbrae Station Traffic Plan Report has a

1    signalized intersection capacity analysis that was done  
2    by Matthew Crane, March 24th, 2014.  It's dated.  
3    There's been quite a lot of development since then.  The  
4    traffic analysis needs to be redone before the board  
5    even considers anything.

6           Also in that traffic analysis, grades A through  
7    F, Millbrae Avenue and El Camino intersection gets a  
8    letter G, which isn't even on the schedule.  F is  
9    operation with delays unacceptable to most drivers  
10   occurring due to oversaturation, poor progression, or  
11   very long cycle lengths.  So already the intersection  
12   gets a letter G, like "goat," and something needs to be  
13   done about that and addressed prior to any more  
14   development being done in town.  And please redo your  
15   traffic analysis.  Thank you.

16           CITY ATTORNEY CONNERAN:  Mr. Mayor, if I might,  
17   just to avoid confusion, while I did want to give people  
18   the opportunity to comment on the Specific Plan, it  
19   seems like people are discussing the EIR.  I think what  
20   we should do is unless a comment is specifically on the  
21   plan and not the environmental impact or how those were  
22   measured, I think we should move on to the public  
23   hearing.  So I don't know who else is left, but -- if  
24   that's your intent.

25           MAYOR GOTTSCHALK:  Can you stay on the Specific

81-7  
(cont.)

1 Plan?

2 GALE GRINSELL: I have no idea where it fits.

3 I just know there is --

4 MAYOR GOTTSCHALK: Let's risk one more speaker  
5 from the public, Ms. Gale Grinsell, and then we'll move  
6 on.

7 GALE GRINSELL: Gale Grinsell, 1310 Millbrae  
8 Avenue.

9 Will I have another chance to ask other  
10 questions when we get to the other segment? Or do I put  
11 all my questions now?

12 MAYOR GOTTSCHALK: I'm sure we'll have  
13 additional speaking and questions opportunities.

14 GALE GRINSELL: Okay. Great. My -- the  
15 concerns I'd like you to address are, number one, water,  
16 and, number two, today I saw on Millbrae Patch that we  
17 are -- I forget what they call it. But there isn't  
18 enough electricity, so they have asked us to -- what do  
19 they call it? -- flex alert.

20 Now, with all of this new development, how are  
21 you planning to get us water and more electricity?  
22 Thank you.

23 MAYOR GOTTSCHALK: Thank you.

24 Now I'm going to -- is Mr. Muzzi here or a  
25 representative?

1 CITY ATTORNEY CONNERAN: I think we want to do  
2 the public -- we need to formally open the public  
3 hearing, and if people have comments on the EIR, we  
4 should. I'm not sure that was clear.

5 MAYOR GOTTSCHALK: Okay. So now you want to  
6 have public comments on the EIR now?

7 CITY ATTORNEY CONNERAN: Right.

8 MAYOR GOTTSCHALK: Okay. Those wishing to  
9 speak with regard to the EIR, please identify  
10 yourselves. I'm sure it's somewhat difficult for people  
11 to distinguish which document --

12 CITY ATTORNEY CONNERAN: We'll count their  
13 comments. It's fine.

14 MAYOR GOTTSCHALK: Very good.

15 CITY ATTORNEY CONNERAN: Just to make sure  
16 people didn't --

17 MAYOR GOTTSCHALK: I've got a speaker, Mr. John  
18 Keefer. If he'll come forward.

19 JOHN KEEFER: John Keefer. I'm with the  
20 Millbrae Park and Recreation Commission.

21 My question is if we're talking about EIR and  
22 we're talking about the quality, we're taking things  
23 away, obviously, when we put things in. One of the  
24 things I would like to see is greenbelts added. And  
25 you're talking about aesthetics, you're talking about

8-9

1 quality of life, and people have voiced other concerns  
2 about traffic and impact.

3 But what are we adding to the City of Millbrae  
4 in terms of recreation? I think we need more areas. We  
5 are a very constrained city compared to other cities. I  
6 would like to see any developments that come into the  
7 City be part of the community and join in and share and  
8 help out our community. I think too often we see these  
9 developments come in and all they do is they take things  
10 away. I want to see developments come in, and I want to  
11 see them add to the quality of the life of our kids and  
12 our adults. Thank you.

13 MAYOR GOTTSCHALK: Perky Ramroth, please.

14 PERKY RAMROTH: Hello. I'm Perky Ramroth. I  
15 live at 1191 Millbrae Avenue, and I am the grandmother  
16 of three children in our school district.

17 I haven't heard any mention of how many  
18 children will be added to our community with the  
19 construction of these hundreds and hundreds and hundreds  
20 of more units. We already have two or three very large  
21 condo and apartment complexes that are completed, which  
22 probably added many more children to our district. My  
23 understanding is that the school district is at or  
24 near -- nearly at capacity, and that they aren't taking  
25 transfers from other communities.

B1-9  
(cont.)

B1-10

1 I'd like to hear from a representative of the  
2 school district and the City to understand where the new  
3 school will be built to accommodate the hundreds,  
4 perhaps hundreds more children that will be added to our  
5 community. Thank you.

6 MAYOR GOTTSCHALK: Any further speakers?

7 GALE GRINSELL: Thanks. For the record, Gale  
8 Grinsell, 1310 Millbrae Avenue.

9 So you can probably guess that I want to talk  
10 to you about traffic. This is a huge development  
11 between 101 and 280. The only road that is a direct  
12 connecting road is Millbrae Avenue, which is a two-lane  
13 curvy road, very dangerous, 25-mile-an-hour speed limit.  
14 In some places it is 25 miles an hour. People have  
15 asked for more stop signs on that street, and we have  
16 been told that because of --- because of the need for  
17 fire trucks, ambulances, this being the direct route  
18 between these two freeways, it's a very important  
19 transit artery, and they can -- there are no more stop  
20 signs.

21 So I think that -- I'm trying to imagine people  
22 trying to ride their bicycle down Millbrae Avenue. In  
23 the morning, it is so busy you would not believe. It's  
24 hard for people to get out of their driveways. So I  
25 think that you need to give extra consideration to

B1-10  
(cont.)

B1-11

B1-11  
(cont.)

1 traffic particularly along that corridor. Because you  
2 know that many of the people coming to this development  
3 will be coming on 280, and how are they going to get  
4 down there? Millbrae Avenue. Thank you.

5 MAYOR GOTTSCHALK: I'll entertain a motion to  
6 close the public hearing.

7 COUNCILMEMBER LEE: I have a procedural  
8 question. So if you close the public hearing, you are  
9 closing it forever? So that's one of my whole questions  
10 about the public hearing. Normally when you have a  
11 public hearing, you expect some action at the end. So  
12 is this really a public hearing, because we're not  
13 really --

14 CITY ATTORNEY CONNERAN: It is really a public  
15 hearing, and the action will be at the end. The end  
16 will be after the 45- or 48-day comment period ends and  
17 we collect all the comments, including those received  
18 tonight. Those are formally responded to in the Final  
19 EIR, and then the action is taken if the Council  
20 certifies the EIR. So it's different from most meetings  
21 in that you don't take any action tonight. You are  
22 simply -- this is simply a public forum to receive  
23 comments on the environmental document.

24 COUNCILMEMBER LEE: Okay. So there is no  
25 closing of the public hearing?

1 CITY ATTORNEY CONNERAN: Well, we're closing  
2 the public -- because tonight's public hearing we are  
3 closing. There is not going to be another public  
4 hearing. If people want to submit comments on the  
5 document, they can submit written comments or comments  
6 through e-mail. This is just an opportunity for a  
7 public session for people to come hear the presentations  
8 and if they wish to get up and speak and provide oral  
9 comments. So there is, I guess, at least three  
10 different ways to submit comments, tonight is just one  
11 of them.

12 But we do need to close the public hearing,  
13 because otherwise it creates an uncertainty in terms of,  
14 you know, when verbal comments can count. We need to  
15 have that closed.

16 COUNCILMEMBER LEE: And, Mr. Mayor, do we have  
17 a chance to still talk about it, the Council and the  
18 Planning Commission? Do we still have time to ask  
19 questions on the EIR or the Specific Plan?

20 MAYOR GOTTSCHALK: I don't see why not, and  
21 we'll also have further opportunity for the public to  
22 make comments later in the evening.

23 So, again, a motion, please.

24 Mr. Lee. Seconded by -- second? Vice Mayor.  
25 Those in favor?



1 to two minutes. And I have got one all ready to go.

2 CITY ATTORNEY CONNERAN: Mr. Mayor, if I might,  
3 I just wanted to again clarify we're required by the  
4 Brown Act to have public comment after each item on the  
5 agenda, so we are fulfilling that obligation. We did  
6 open and close the public hearing on the EIR. I just  
7 want to emphasize if people want to make a comment and  
8 have it formally responded to in the Final EIR, at this  
9 point they should fill out one of the forms and submit  
10 that in written form. But certainly people are more  
11 than free to comment on what they have heard.

12 MAYOR GOTTSCHALK: Thank you.

13 Mr. Satara.

14 SURESH SATARA: My name is Suresh Satara. I'm  
15 an architect. We're working on one of the smaller sites  
16 on the west side abutting El Camino.

17 I guess since we're so adjacent to the  
18 property, next to CalTrain and the BART station, we're  
19 looking at reducing parking. I'd rather than give the  
20 parking to the BART sites, if we can. And doing some  
21 sort of micro-units of some sort, because we're a  
22 transit-oriented site more so than anything else.

23 And I was thinking that maybe the reduction of  
24 parking, more transit-oriented apartments or maybe  
25 Zip-car type shuttle service and so on might be more

181-12  
(cont.)

1 appropriate for this site because of its adjacency to  
2 CalTrain. That's all I have to say.

3 MAYOR GOTTSCHALK: Thank you. Other speakers?  
4 Ms. Papin?

5 GINA PAPIN: Thank you, Mr. Mayor and Council  
6 and Project.

7 I am here to talk more about, I think, TOD --  
8 TOD #2. As a vision here, I'm not seeing actually more  
9 of a flow through the transit aspects of this, how it  
10 connects with BART, with CalTrain. And also I know that  
11 SFO has a plan to extend their people mover into this  
12 area station. So I'm not seeing that. I am concerned  
13 about that.

14 I really see this TOD #2 as a much bigger  
15 project and a more integral project, a project that  
16 works together throughout. If you look at some other  
17 big transit areas, we're not really doing enough here.  
18 I don't see this really as an area for people as far as  
19 apartments go and office space. I think the City would  
20 actually benefit more from a highly retail area. I  
21 think the report was done by the City earlier as to the  
22 aspects and the benefit to the City for high-end retail  
23 in this area, and I'm just not seeing that in the  
24 current proposal.

25 And I know that Republic has really worked hard

81-13

1 to develop their project, I just think that this City  
2 needs a more vibrant project as we move forward. This  
3 is really the entry for the entire Bay Area. We have  
4 shuttles going in and out of there now. We have BART  
5 trains. We have CalTrain. We hope to have, as SFO has  
6 expressed to us, a connection directly to SFO.  
7 High-speed rail, everything.

8 This is our opportunity to really make this  
9 more than a landmark, a destination for years and years  
10 to come. I think we can really, if Millbrae expresses  
11 their vision of this project, they can make it happen.  
12 We have talked about really bringing in anchor stores,  
13 like an Apple Store. Grand Central Station has an Apple  
14 Store. The Louvre museum. All these different places.  
15 We need something that's going to strongly bring people  
16 into this community, and then also connecting them  
17 easily to all the transit.

18 I saw that from the TOD #1 that it's going to  
19 connect through escalators and bring people right easily  
20 through their development. That was really great to  
21 see. It should all be that way. Both the TOD #1 and 2  
22 should flow right into the station so that you are not  
23 having cars running in and out, you are not having  
24 people struggling to get from point A to point B.

25 This has been a problem throughout all the Bay

B1-13  
(cont.)

1 Area in that transit is not connected in an easily  
2 flowing fashion for people if they are getting off the  
3 BART train or if they are getting on CalTrains and how  
4 they get over to the airport. It needs to be more of an  
5 effort that blends the entire system easily for  
6 commuters, and I just don't see that, and it's my  
7 concern with the currently proposed TOD #2 here.

8 I think we can do a lot greater things, and I  
9 hope to submit that in the future. Thank you.

10 MAYOR GOTTSCHALK: Thank you.

11 Any other speakers?

12 GALE GRINSELL: I'm sorry, but --

13 MAYOR GOTTSCHALK: Three bites at the apple,  
14 Ms. Grinsell?

15 GALE GRINSELL: Maybe four if I hear more.

16 MAYOR GOTTSCHALK: Very briefly, please.

17 GALE GRINSELL: Gale Grinsell, 1310 Millbrae  
18 Avenue.

19 My questions are very specific. How many  
20 parking places are being lost at the BART station? A  
21 number.

22 How many parking places are you setting aside  
23 in these new thousands of parking spaces for residents,  
24 for people who will be working at these sites?

25 And how many parking spaces are new that

BH-13  
(cont)

BH-14

1 will -- we have never had before?

2 Because I think all of these parking  
3 projections, it seems to me they are way off. You are  
4 taking a lot away. You are going to be bringing in  
5 people staying at a hotel. They are going to need  
6 places to park.

7 So if somebody wants to go down to this area to  
8 get lunch, go to a pumpkin festival, where the heck are  
9 they supposed to park? Because if you have got 321  
10 units, there's at least 321 cars. Most everybody is  
11 going to have a car, because you cannot get everywhere  
12 on public transportation. That's all a pipe dream. Or  
13 a bicycle. It's just ridiculous. So I think the  
14 parking numbers need to be specified. Thank you.

15 MAYOR GOTTSCHALK: Well, I want to thank the  
16 staff, the consultants, the applicants, everyone. And  
17 there is quite a team who has been involved for months  
18 in bringing us where we are today in these very, very  
19 important projects.

20 Also, I want to thank everyone who is here with  
21 us this evening. Be assured that your comments and  
22 questions will be thoroughly reviewed and incorporated  
23 in the final product before the Council approves  
24 anything.

25 And so with that, I will adjourn the Planning

BH4  
(cont.)

1 Commission, recess the City Council for a closed-session  
2 hearing in the Council conference room. Thank you all.

3 COUNCILMEMBER LEE: Mr. Mayor, I thought we got  
4 an opportunity to speak on the EIR, because I do have  
5 some comments. If that's okay?

6 MAYOR GOTTSCHALK: Mr. Lee, as long as it's  
7 brief.

8 COUNCILMEMBER LEE: Well, okay. Anyway, I was  
9 hoping to hear what everybody else had to say.

10 But I have a question about the EIR. On the  
11 Grant Boulevard plan, there's some -- there are some  
12 issues about safety on El Camino. And some of the  
13 proposal is to -- is to narrow El Camino and add bus  
14 rapid transit, which is a dedicated lane for buses, and  
15 hopefully Class 1 or Class 2 bicycle lanes. So I'm  
16 wondering if the EIR will take that into consideration.

17 And also, I'm also concerned about the backup  
18 that happens daily at the west -- at the Wilson Plaza  
19 where the In-N-Out Burger place is. Right now there is  
20 a lot of backup going in and backup going out. It's  
21 particularly people trying to get onto southbound 101.  
22 And so I was looking for that in the EIR. Maybe you can  
23 point me there sometime. I want to make sure it's in  
24 there.

25 And, again, I thank you for the opportunity,

81-15  
(cont.)

1 Mr. Mayor, and your work.

2 MAYOR GOTTSCHALK: Once again, adjourned.

3 Thank you very much.

4 (Time noted: 7:41 p.m.)

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CERTIFIED SHORTHAND REPORTER'S CERTIFICATE

The foregoing public hearing was held before me, KELLI A. RINAUDO, Certified Shorthand Reporter, License No. 6411 RMR, CRR, CCRR, and CLR, for the State of California.

All oral remarks were taken by me in machine shorthand at the time and place therein named, and thereafter under my direction transcribed into longhand.

I further certify that I am not of counsel or attorney for either or any parties involved or appearing at said hearing, nor in any way interested in the outcome, and that I am not related to any party thereto.

Executed July 14, 2015.



---

KELLI A. RINAUDO  
Monarch Court Reporting  
Certified Shorthand Reporter  
CSR 6411, RMR, CRR, CCRR, CLR





CITY OF MILLBRAE  
MILLBRAE STATION AREA SPECIFIC PLAN UPDATE AND  
TRANSIT-ORIENTED DEVELOPMENT #1 AND #2  
DRAFT EIR PUBLIC MEETING: 6:00 PM, TUESDAY, JUNE 30, 2015

**COMMENT CARD**

Please fill out this card with any comments you have related to the adequacy of the Draft EIR.

Name	Ed Chan
Phone/Email	650-269-8448 / edchan18@gmail.com
Address	

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 anyway. I am planning to operate a retail space and want to make sure there are no issue doing so. Thank you.

BI-16

You may submit your comment card at the meeting tonight, or submit by the end of the comment period at 5:00 pm on Monday, August 10, 2015

Mail to: Community Development Department

Attention: Millbrae MSASP DEIR, 621 Magnolia Avenue, Millbrae, CA 94030

Email: MillbraeMSASPDEIR@ci.millbrae.ca.us

B2-1

Ms. Nancy Shaw  
2 Bertocchi Ln.  
Millbrae, CA 94030-1139  
\* SUPPORT OUR TROOPS \*

July 2, 2015

Dear Mr. Taylor,

I am writing this letter to comment on the massive Millbrae Station Area Developmental Project.

The operative word is "MASSIVE"! How can a small city like Millbrae absorb this kind of instant growth? The incorporation of residents from the Seawood Station Properties and the SFO residents from the other development will certainly "take" the city's infrastructure!

How will we be able to serve 2000 more residents and their employees? Certainly traffic congestion will follow, as well as a dearth of parking spaces for 2000 more employees!

Millbrae can use a more flexible tax base - more hours, more businesses, more hotels, and more restaurants but not on the "MASSIVE" scale.

Down town Millbrae needs to be rejuvenated.



120-1998

B2-1  
(cont.)

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 heard 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. 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 a connect to the center? - More Parks, more

B2-2

Trails, more tennis courts, more fields for kids to play? Will our school

B2-3

system be able to handle a major growth of students?

There was a lot of controversy when In A out wanted to move to Millbrae. That whole experience

B2-4

B2-4  
(cont.)

center across from Post  
was really good for mill brace.  
In it. But brings into of  
business to mill brace. The gas  
station there is well used, too.  
The other part food enterprises  
are well attended. However, need  
putting the car wash there. Some day  
the area got crowded. Some day  
it is difficult to drive by the area  
on Rolling Road or drive into  
the shopping area. So many

Parking spaces were eliminated.  
We conveniently canceled use a new  
car wash did not there. Post here

is at a premium now.  
And meaning the new  
developments will be  
crowding this small  
community. The Gateway  
to Mill Drive.

B2-5



B2-6

I could not attend  
the public meeting on  
June 30 but I did  
want to express my  
concern. I know  
I cannot stop progress  
or stop development but  
Massive is not the way  
to go.

Thank you.

Sincerely,

Nancy Shaw



Ms. Nancy Shaw  
2 Bertochi Ln.  
Millbrae, CA 94030-1139

★ SUPPORT OUR TROOPS ★



Comment Letter B3

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

July 13, 2015

Millbrae City Manager and  
Honorable Members of the City Council  
City of Millbrae  
Via e-mail: [mraines@ci.millbrae.ca.us](mailto:mraines@ci.millbrae.ca.us)

**Re: Millbrae Station Area Specific Plan – Request for extension of Draft EIR comment period to 60 days**

Dear Ms Raines and Members of the Millbrae City Council,

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 SB 375** 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 Draft EIR comment period is set to close on August 10<sup>th</sup> 2015. **We are hereby requesting that the comment period be extended to 60 days.** We believe this is a reasonable request because:

- This 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.

**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 and the DEIR.**

- **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.**

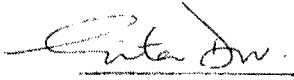
The Station AREA precise Plan is going to bring big changes to the City of Millbrae and its residents, as well as to the region. We learned, at the City Council meeting on June 30<sup>th</sup> 2015, that there would be the first of two Community Workshops on July 16<sup>th</sup> 2015. As of this morning (13<sup>th</sup> July), we have yet to see any information about such a meeting on the City website or on the MSASP web pages.

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 16<sup>th</sup> will not have received sufficient public notification to reach a wide audience.

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.

B3-4

Respectfully submitted:



Gita Dev, Co-Chair  
Sustainable Land Use Committee  
Sierra Club, Loma Prieta Chapter

Cc Marcia Raines, Millbrae City Manager, [mraines@ci.millbrae.ca.us](mailto:mraines@ci.millbrae.ca.us)  
Michael J Ferreira, Chair, Conservation Committee, Sierra Club, Loma Prieta Chapter  
Gladwyn D'Souza, Sustainable Land-Use Committee, Co-Chair  
John Cordes, Executive Director, Sierra Club Loma Prieta Chapter

Pirzadeh

JUL 15 2015

City of Millbrae  
Community Development Department

MEMORANDUM

To: Ellen Smith, BART

Distribution: Kelly Erardi, RUP  
Konstantin Voronin, RUP

From: Pete Pirzadeh

Date: July 14, 2015

Subject: Millbrae Station Development

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:

- 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 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.
- 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.

B4-1



**Soyeb Palya**

Comment Letter B5

**From:** jeffrey@jeffreytong.com  
**Sent:** Thursday, July 16, 2015 11:58 PM  
**To:** Soyeb Palya  
**Subject:** Comments to Millbrae Station Area Draft EIR

Gentlemen

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.

Persuant 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!

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.

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 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.

Jeffrey Tong, Member  
San Bruno Bike & Ped Advisory Committee

## Community Meeting 7/16/15 Questions and Comments

**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?

B6-1

**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?

B6-2

**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.

B6-3

**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.

B6-4

**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.

B6-5

**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.

B6-6

**Jeffery Tong, Resident of San Bruno and with the San Bruno Bike and Pedestrian Committee.**

**Comment:** Aviator 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.

B6-7

**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.

B6-8

**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 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.

B6-9

**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.

B6-10

**Soyeb Palya**

*Comment Letter B7*

**From:** Christi DiIorio  
**Sent:** Friday, July 24, 2015 3:41 PM  
**To:** 'stephanie davis'; Soyeb Palya  
**Subject:** FW: DEIR

EIR comments

**Christine di Iorio, Director**

Community Development Department  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030  
650-259-2416  
650-697-2657 Fax  
cdiurio@ci.millbrae.ca.us

**From:** Dan Quigg [mailto:cqndq@comcast.net]  
**Sent:** Friday, July 24, 2015 3:33 PM  
**To:** Christi DiIorio <CDiIorio@ci.millbrae.ca.us>  
**Cc:** Marcia L. Raines <MRaines@ci.millbrae.ca.us>  
**Subject:** DEIR

Hello

The week went by so quickly that I did not call you to schedule an appointment

| 87-1

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.

| 87-2

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.

| 87-3

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

| 87-4

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

| 87-5

**Catherine Quigg**  
**Planning commissioner**

Soyeb Palya

Comment Letter B8

From: Jackie To <jackieto@gmail.com>  
Sent: Thursday, July 30, 2015 3:15 PM  
To: Soyeb Palya  
Subject: Concerns

Hi,

I am a resident of Millbrae since 2006. I want to express the concerns regarding the following:

1) New Bart Parking Lot Redevelopment - Wouldn't this add substantial traffic to Millbrae Ave? The traffic is already quite bad now.

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.

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.

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.

Thanks,

Jackie

Soyeb Palya

Comment Letter B9

**From:** Mike Voytovich <mikevoyt@gmail.com>  
**Sent:** Thursday, July 30, 2015 10:35 AM  
**To:** Soyeb Palya  
**Subject:** Fwd: input regarding Millbrae Station Area Specific Plan

Hi,

I am writing to urge you to consider the recommendations of the Sierra Club in regards to pedestrian access and reduced parking:

<http://sf.streetsblog.org/wp-content/uploads/sites/3/2015/07/Sierra-Club-Millbrae-Letter-10-16-14.pdf>

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.

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.

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.

Regards,  
Mike Voytovich  
351 Laurel Ave  
Millbrae, CA  
94030

B9-1

B9-2

Soyeb Palya

Comment Letter BIO

**From:** Jessica Hudson <jessica.n.hudson@gmail.com>  
**Sent:** Friday, July 31, 2015 7:17 PM  
**To:** Soyeb Palya  
**Subject:** Planned Developments

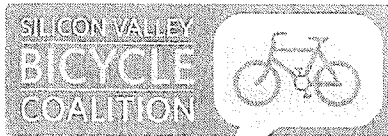
Hello,

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.

Thank you for your consideration.

Jessica Hudson

BIO-1



August 3, 2015

96 N. Third Street, Suite 375  
Post Office Box 1927  
San Jose, CA 95109

Tel 408.287.7259  
Fax 408.213.7559

Christine di Iorio, Community Development Director  
Community Development Department  
City of Milbrae  
Via email: [cdiorio@ci.millbrae.ca.us](mailto:cdiorio@ci.millbrae.ca.us)

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SVBC is a 501(c)(3)  
non-profit organization  
EIN 77-0038859

<http://bikesiliconvalley.org>

Re: Millbrae Station Area Specific Plan and Draft Environmental Impact Report

Dear Ms. di Iorio,

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 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 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.

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.

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.

B11-1

B11-2

B11-3

B11-4



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:

	PLAN	SVBC Recommendation
El Camino Real	Bike route (Class III)	Protected bike lane (Class IV)
Millbrae Ave.	Bike route (Class III) 6' Bike lane (Class II)	5' bike lane with 2-3' buffer (Class II)
101 ped/bike bridge	10-14' wide	At least 12' wide
Rollins Rd.	6' Bike lane (Class II)	5' bike lane with 2-3' buffer (Class II)
Murchison Dr.	Bike route (Class III)	5' bike lane with 2-3' buffer (Class II)
California Dr.	5-6' Bike lane (Class II)	Protected bike lane (Class IV)
Victoria Ave.	6' Bike lane on one side, Bike route on the other side (Class II and III)	Bike lanes on both sides
Chadbourne Ave.	None	5' bike lane with 2-3' buffer (Class II)

B11-4  
(cont.)

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.

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.

B11-5

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.

B11-6

See table:

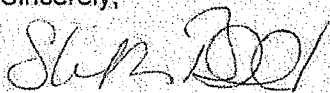
	PLAN	SVBC Recommendation
Residential: long-term/Class 1	0.5/bedroom	1/bedroom
Residential: short-term/Class 2	0.05/bedroom	0.1/bedroom
Office: long-term/Class 1	1/10,000 sq ft	1/5,000 sq ft
Office: short-term/Class 2	1/20,000 sq ft	1/10,000 sq ft
Retail: long-term/Class 1	1/12,000 sq ft	1/6,000 sq ft
Retail: short-term/Class 2	1/2,000-5,000 sq ft	Good

B11-6  
(cont.)

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.

B11-7

Sincerely,



Shiloh Ballard  
President and Executive Director

CC: Millbrae City Council

**Soyeb Palya**

---

**From:** Christi DiIorio  
**Sent:** Thursday, August 06, 2015 12:11 PM  
**To:** Soyeb Palya  
**Subject:** FW: Specific Plan Update, and TOD #1, and TOD #2 EIR

Christine di Iorio, Director

Community Development Department  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030  
650-259-2416  
650-697-2657 Fax  
cdiiorio@ci.millbrae.ca.us

**From:** Paul O'Leary [mailto:paul\_oleary@yahoo.com]  
**Sent:** Tuesday, August 04, 2015 12:48 PM  
**To:** Christi DiIorio <CDiiorio@ci.millbrae.ca.us>  
**Subject:** Specific Plan Update, and TOD #1, and TOD #2 EIR

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.

Paul

B12-1



# HEXAGON TRANSPORTATION CONSULTANTS, INC.

## Memorandum

**Date:** August 6, 2015  
**To:** Mr. Sal Ariganello  
**From:** Gary Black  
**Subject:** Millbrae Station Area, Transit Analysis

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 development area.

### Existing Transit Services

#### Bus Services

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.

**Route ECR.** 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.

**Route 397.** 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.

#### Shuttle Services

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.

**Broadway-Millbrae.** 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.

**North Burlingame.** 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.

B13-1

B13-2

**Mercy High School Shuttle.** Mercy High School Shuttle provides services for Mercy High School students starting at 7:00 AM. 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 7:40 AM.

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.

## Millbrae Station Area Specific Plan

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.

### Roadway Network

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.

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.

### Transit Circulation

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 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.

### Pedestrian Circulation

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.

## Conclusions

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.

- 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.

B13-2  
(cont.)

B13-3

B13-4

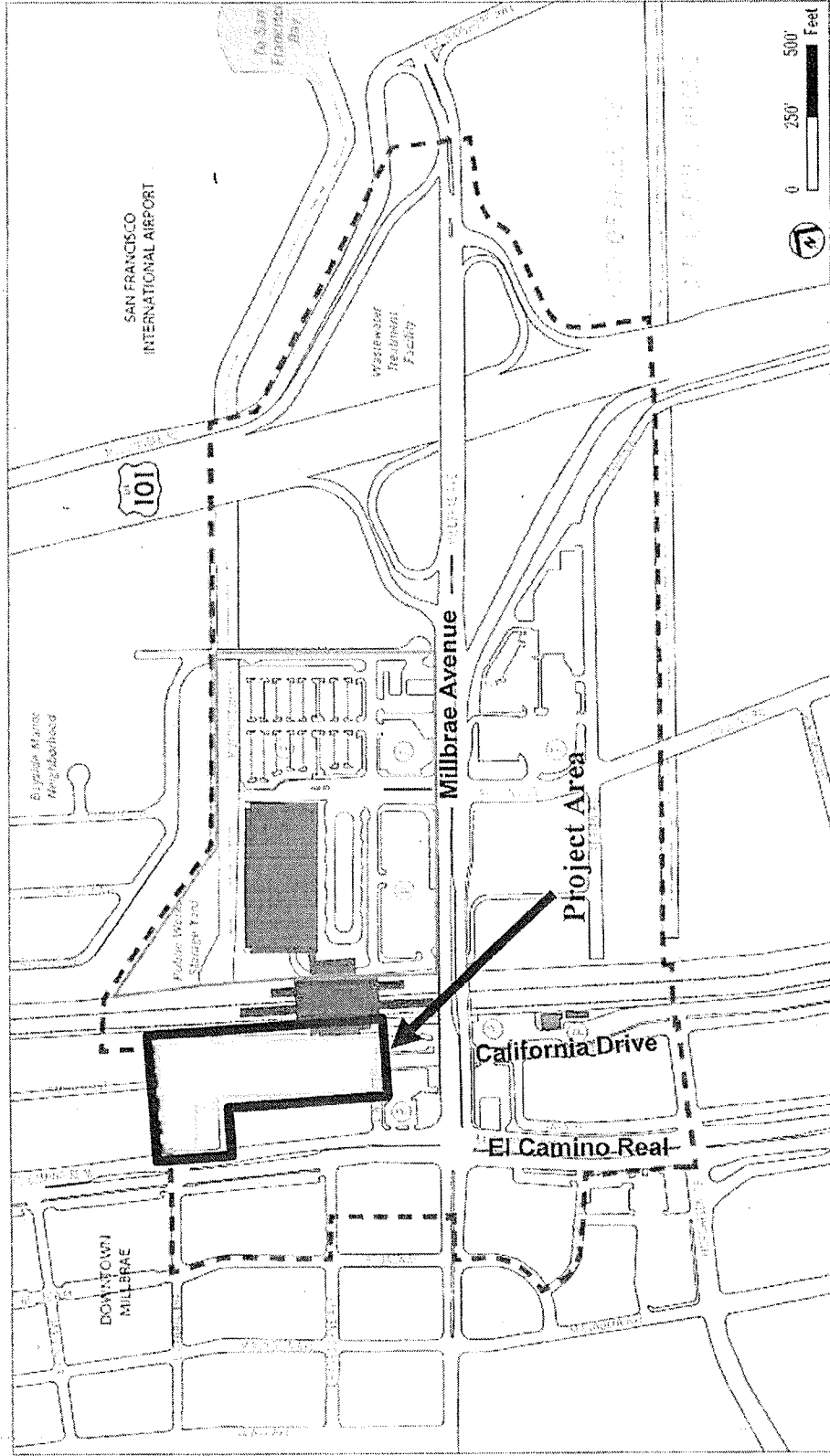
B13-5

B13-6






B13-7

B13-8

# Millbrae Station Area – Transit Analysis



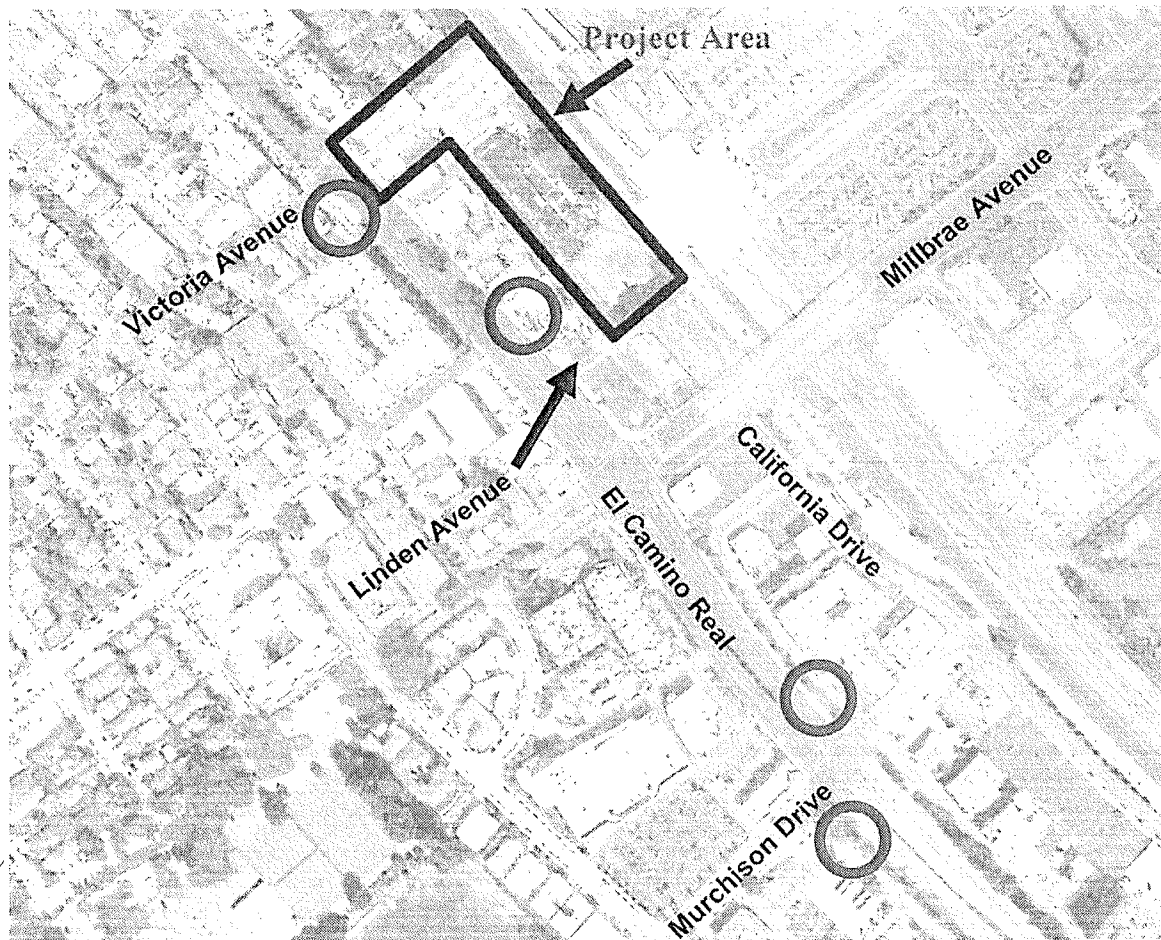
Source: PlaceWorks, 2015.

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

**Figure 1**  
Project Area within MSASP and TOD #1 Boundary

- 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. | B13-9
- 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. | B13-10
- 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. | B13-11
- 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. | B13-12
- One bus stop in each direction on California is sufficient. There is no need for three bus bays. | B13-13

We appreciate the opportunity to submit this memorandum. Please do not hesitate to contact us if additional information is needed. | B13-14



**Figure 2**  
**Existing Bus Stops**



From: Douglas Radtke <dougradtke@gmail.com>  
Sent: Friday, August 07, 2015 1:19 PM  
To: Soyeb Palya  
Subject: Feedback on Millbrae Specific Area Plan

I have the following feedback for the current draft of the Millbrae Plan:

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.

B14-1

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).

B14-2

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 as 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 the good of ALL residents.

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 itself is building massive office space for Solar City and Go Pro. Where are all these people going to live?

B14-3

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 inbetween lunch and dinner shift.

B14-4

These are hardworking people who contribute to your lunch and dinner here in Millbrae who deserve an opportunity to reduce their commute by HOURS and simultaneously reduce their carbon footprint.

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.

B14-5

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.

814-6

We should look to the Serra Properties plan as a better guide for the objective of the Millbrae Plan.

Please consider my comments in your deliberations as I have participated at the majority of the public sessions

Regards,  
Doug Radtke

**Soyeb Palya**

Comment Letter B15

**From:** Holly Borghello <fullomalarky@comcast.net>  
**Sent:** Friday, August 07, 2015 3:10 PM  
**To:** Soyeb Palya  
**Subject:** Millbrae Station Area

Not that this will be taken seriously but I was told I could write in and state my opinion and suggestions.

My suggestion is to leave things alone and build nothing!

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.

B15-1

Millbrae is no longer the Millbrae that any of my neighbors and friends remember or liked.

Holly Borghello

# Comment Letter B16

**From:** johneroche@netscape.net <johneroche@netscape.net>

**Sent:** Monday, August 10, 2015 4:39 PM

**To:** Robert Gottschalk; aolivia@ci.millbrae.ca.us; Reuben Holoher; Marge Colapietro; Wayne Lee

**Subject:** MSASP

Dear Council Members.

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.

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 infrastructure improvements, police fire and other city services expansion made necessary by the developments.

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.

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.

How can you in good conscience degrade the way of life of your friends and neighbors. The only beneficiaries are the developers. 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.

Just look across the street from Bart and you see a few stores and the only 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.

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.

B16-1

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.

B16-1  
(cont.)

Sincerely,

John Roche

Comment Letter B17

**From:** M V [mailto:chitov@msn.com]  
**Sent:** Monday, August 10, 2015 10:47 PM  
**To:** Christi DiIorio <CDiIorio@ci.millbrae.ca.us>  
**Cc:** Marcia L. Raines <MRaines@ci.millbrae.ca.us>; Robert Gottschalk <RGottschalk@ci.millbrae.ca.us>  
**Subject:** Fwd: Millbrae Station Area Comments

Begin forwarded message:

**From:** "MV" <chitov@msn.com>  
**Date:** August 10, 2015 at 1:31:26 PM PDT  
**To:** <MillbraeMSASPDEIR@ci.millbrae.ca.us>  
**Subject:** RE: Millbrae Station Area Comments

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.

There may be room if RR Avenue were made one-way but kept two-way for bicycle users.

**From:** MV [mailto:chitov@msn.com]  
**Sent:** Monday, August 10, 2015 1:18 PM  
**To:** 'MillbraeMSASPDEIR@ci.millbrae.ca.us'  
**Subject:** Millbrae Station Area Comments

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.

California Dr is a key regional bike connection as part of the San Mateo County 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.

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 42<sup>nd</sup> 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 Blvd between 42<sup>nd</sup> 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.

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.

B17-1

B17-2

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 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.

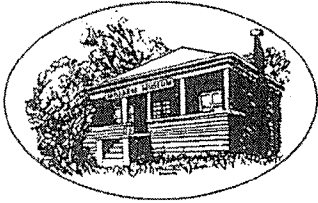
B17-2  
(cont.)

Thanks,

Manito







MILLBRAE HISTORICAL SOCIETY

Post Office Box 511 • Millbrae, California 94030

A NON-PROFIT CORPORATION

Comment Letter B18

RECEIVED

AUG 10 2015

CITY OF MILLBRAE  
ADMIN DEPT.

Honorable Mayor and  
Members of the Millbrae City Council  
621 Magnolia Ave.  
Millbrae, CA 94030

August 6, 2015

Re: Comments to the Draft Environmental Impact Report of  
Millbrae's Station Area Specific Plan.

To whom it may concern:

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.

B18-1

Thank you for your concern with this matter.

John Muniz  
President

Vernon W. Bruce  
Train Museum Director

Comment Letter B19

**From:** Vince Muzzi [mailto:vince@vmuzzi.com]

**Sent:** Monday, August 10, 2015 4:13 PM

**To:** Soyeb Palya <SPalya@ci.millbrae.ca.us>; Christi Diiorio <CDiiorio@ci.millbrae.ca.us>

**Cc:** Jennifer Renk <JRenk@sheppardmullin.com>; Sigrid Waggener <Sigrid.Waggener@sedgwicklaw.com>;

Salvatore Ariganello <Sal@ccmwest.com>; Don Clark <dclark@cathexes.com>; Jeremy Packer

<JPacker@cathexes.com>; Marc Pfenninger <mpfenninger@studios.com>; Peter Van Dine

<pvandine@studios.com>

**Subject:** Millbrae Serra Station, LLC Comments on Millbrae Station Area Plan DEIR

All:

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.

B19-1

Please advise me if there should be any problem with your receiving this email 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.

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.

Thanks,

Vince

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August 10, 2015  
Millbrae Serra Station Area Comments on  
DEIR for the Millbrae Station Area Specific Plan and TOD #1

Section 2, Page 22:	Remove reference to "Weeks and Grimmer" from CULT TOD #1-1.	B19-2
Section 2, Page 23:	<p>Height issue for TOD #1: We ask that the DEIR <b>THROUGH OUT</b> not pre-condition 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>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>	B19-3
Section 2, Page 27:	If the City intends to pursue any traffic mitigations, how is developers' fair share to be addressed?	B19-4
Section 3, Page 3:	Don't you need to mention CalTrain electrification?	B19-5
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."	B19-6
Section 3, Figure 10:	Change "*Heights must comply with San Francisco 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.	B19-7
Section 3, Page 20:	<p>1. Add Uses: Museum ("P"), Theater ("C") Co-Generation ("P") and Paid Public Parking ("P").</p> <p>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."</p>	B19-8 B19-9
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."	B19-10

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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.

B19-11

Section 3, Page 24: Table 3.3:

B19-12

1. Modify Notes and Footnotes "a" 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."

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.

B19-13

3. Modify Setback under TOD rear setback to "0 feet" from sidewalk on new extension of new California Drive street frontage since City has increased width of both that street and sidewalk for SamTrans.

B19-14

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."

B19-15

5. TOD increase maximum permitted floor plate to 50,000 square feet is what technology companies are demanding.

B19-16

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).

B19-17

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.

B19-18

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.)

B19-19

August 10, 2015  
 Millbrae Serra Station Area Comments on  
 DEIR for the Millbrae Station Area Specific Plan and TOD #1

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 decided at the time of	B19-20
Section 3, Page 43:	1. Conditional Use Permits "CUP's" should be added to list of approvals.  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.	B19-21  B19-22
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.	B19-23
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.	B19-24
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..	B19-25
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.  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.	B19-26  B19-27
Section 3, Page 60:	Utilities discussion omits sewer service.	B19-28
Section 3, Page 61:	The list needs to be made consistent with Section 3, page 43 and Section 3, page 83.	B19-29
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.	B19-30
Section 4.4, Page 11:	Remove reference to "Weeks and Grimmer" from CULT TOD #1-1.	B19-31
Section 4.8, Page 22:	Sea level rise discussion is missing an impact conclusion.	B19-32
Section 4.9, Page 16:	How is LUS.1 Commercial and Industrial Needs not applicable to TOD #1?	B19-33
Section 4.9, Page 18:	FAR typo: shown as 4.75, please correct to show 5.75.	B19-34

August 10, 2015  
Millbrae Serra Station Area Comments on  
DEIR for the Millbrae Station Area Specific Plan and TOD #1

Section 4.10, Page 26: Last paragraph should say, "Standard of Significance 6" (not "5") and "aviation facilities" should be replaced by ""private airstrips."

B19-35

Section 4.10, Page 31: 1. Second to last sentence under "Summary" needs an ending.

B19-36

2. Under TOD #1 Project, first sentence should state the "interior residential uses" would be required to stay under 45dBA.

B19-37

Section 4.10, Page 40: At top of page, TOD #1 should be #2 and MM should be 1-2.2.

B19-38

Section 4.10, Page 72: In the second sentence use "would" not "could."

B19-39

Section 4.12, Page 23: Was a Developer Fee Study approved? If so, this section could be updated.

B19-40

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?

B19-41

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?

B19-42

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.

B19-43

Section 5.2, Page 5: Table 5.2.2 shows in the "No Project" alternative 500 hotel rooms instead of 500 Residential (Units).

B19-44

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.

B19-45

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.

B19-46

August 10, 2015

Millbrae Serra Station Area Comments on  
DEIR for the Millbrae Station Area Specific Plan and TOD #1

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.

B19-47

**From:** Adina Levin [mailto:aldeivnian@gmail.com]

**Sent:** Monday, August 10, 2015 3:22 PM

**To:** Christi Diiorio <CDiiorio@ci.millbrae.ca.us>

**Subject:** Millbrae Station Area Specific Plan and Draft Environmental Impact Report

Attention: Christine di Iorio

Community Development Director Community Development Department City of Millbrae

Honorable Mayor and City Council, Planning Commission and Ms. di Iorio,

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.

To further the goal sustainable transportation and transit-supportive land use, 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.

B20-1

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

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."

B20-2

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.

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.

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.

B20-3

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.



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.

B20-3  
(cont.)

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 and public reporting, so as to achieve the overall goal across the set of developments in the plan area.

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.

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.

B20-4

The DEIR describes the additional surface parking in a positive manner as 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.

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 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.

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.

B20-4  
(cont.)

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.

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.

This approach to transportation design conflicts with multiple objectives in the 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.

B20-5

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.

El Camino Intersection	City	Average Daily Trips
San Bruno Ave	San Bruno	34,000
Millbrae Ave	Millbrae	22,400
Ravenswood	Menlo Park	31,000
3rd Ave	San Mateo	29,500
Castro	Mountain View	41,500

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.

Potential improvements to consider include, but are not limited to, the following major elements:

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 crossed and a safe haven at the middle of the street
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.

B20-5  
(cont.)

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.

B20-6

Thank you for your consideration

Sincerely

Adina Levin  
Director, Friends of Caltrain  
<http://greencaltrain.com>  
650-646-4344



SIERRA  
CLUB

**Sierra Club Loma Prieta Chapter**

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Christine di Iorio, Community Development Director  
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621 Magnolia Avenue,  
Millbrae, CA 94030  
Via Email: cdiiorio@ci.millbrae.ca.us

August 10, 2015

**RE: Comments on Draft EIR for Proposed MSASP Update**

Honorable Mayor and City Council, Planning Commission and Ms. di Iorio,

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.

B21-1

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.

**Air Quality**

The Draft EIR informs that the proposed buildout of the Specific Plan Area, TOD #1, and TOD #2 would individually and collectively result in significant unavoidable impact to air quality in Millbrae. Specifically, the proposed actions would individually and collectively 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 for air pollutants.

B21-2

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 95% increase in total daily VMT, even when accompanied by a 75% reduction in VMT per capita (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.

B21-3

Secondly, with regards to significant emissions of PM2.5 we urge the City to consider the fact that SFBAAB [San Francisco Bay Area Air Basin] which includes San Mateo County, is currently a designated nonattainment area for ozone and PM2.5. As a result, additional unmitigated emission of PM2.5 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.

B21-4

Currently, in Millbrae, cardiovascular events, chronic lower respiratory disease and lung cancer, are among the top 5 leading causes of death 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.

B21-5

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. 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 EIR<sup>1</sup>.

B21-6

#### Greenhouse Gas Emissions<sup>1</sup>

SB 375, the Sustainable Communities and Climate Protection Act of 2008 was intended to reduce GHG emissions by aligning regional long-range transportation 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 MMTCO<sub>2</sub>e) emissions reduction for light duty trucks and passenger vehicles from 2005 levels by 2035.

B21-7

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 MTCO<sub>2</sub>e BAAQMD threshold. However, buildout emissions for each, exceed the 1,100 MTCO<sub>2</sub>e bright-line threshold of the BAAQMD. 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. 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. 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.

B21-8

<sup>1</sup> 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.

## Transportation and Circulation

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 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 mass transit.
2. "Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections..."

B21-9

The draft EIR highlights that the proposed buildout of the specific plan area would:

- 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.

Proposed mitigation to the above-listed significant unavoidable impacts revolve almost exclusively around lane additions and widening of existing roads to facilitate motorized travel. While there are a few proposed improvements to bicycle circulation, these are all confined to the small interior streets and a connection to the planned Bay Trail.

B21-10

This approach to transportation design conflicts, distinctly, with at least four objectives in the Draft EIR (P. 3-40) that promote the development of Complete Streets 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 most direct north-south and east-west connecting routes respectively, to the BART/Caltrain Station and to the specific plan area in general. 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 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 accidents especially involving pedestrians and bicyclists in this area. This is unacceptable.

B21-11

The Sierra Club suggests that the City revise the Draft EIR to consider the safety and efficiency of alternative modes of travel along the major streets and intersections. Regulatory policies that must be considered in the analysis of every street intersection in the MSASP include:

B21-12

- Caltrans Deputy Directive 64 (consider needs of non-motorized travelers),
- Caltrans Deputy Directive 64-R1 (provide for needs of travelers of all ages and abilities)
- Caltrans Director's Policy 22 (accommodate needs of pedestrians and bicyclists),

B21-13

B21-14

B21-15

- California Complete Streets Act of 2008 (AB 1358),
- Senate Bill 743 (which is intended to negate LOS as a measurement in EIRs),
- MTC Regional Regulations (that promote complete streets),
- Millbrae Policy C1.3 (promote safe walking),
- Millbrae Policy C1.8 (promote bikeway and pedestrian improvements),
- Millbrae Policy C3.1 (separate regional and commuter traffic from local traffic),
- Millbrae Policy C4.9 (provide a safe and logical bikeway system),
- Millbrae Policy C4.15 (pedestrian safety and convenience to be considered in the design of intersections), etc.

B21-16  
B21-17  
B21-18  
B21-19  
B21-20  
B21-21  
B21-22  
B22-23

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:

B21-24

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. Improved, safer, shorter pedestrian crosswalks with bulbouts to reduce the number of lanes crossed and a safe haven at the middle of the street
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.

B21-25  
B21-26  
B21-27  
B21-28  
B21-29

We want to reiterate that studies show adding lanes to roadways create added "induced demand" which is likely to result in both an increase in traffic and further 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. 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.

B21-30

In addition to encouraging pedestrian and bicycle modes by improving access for these modes, it is well known that strategies to *discourage* 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:

B21-31

1. Parking be entirely unbundled so that users pay to park throughout the MSASP area.
2. Employers use parking cash-out - employees are paid to not drive to work

B21-32  
B21-33

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.] | 821-34
4. Plan for only shared parking, preferably in separate public parking structures that can be removed and replaced if parking needs get reduced. | 821-35
5. All buildings - office and residential- be required to participate in discounted transit pass programs so that residents and employees have transit convenience. | 821-36
6. And, Resident Parking Permit programs need to be put in place, paid for by developer fees, in the neighborhoods around the MSASP area to protect neighborhoods from overflow parking. | 821-37

### Land-Use and Planning

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). | 821-38

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 increase population in the specific plan area by nearly 600% (Table 2-1).

We propose that the City amend the planning document and zoning ordinance in the MSASP to include public benefit zoning. 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 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. | 821-39

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. | 821-40

### Affordable Housing

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. | 821-41

Affordable housing coupled with reduced parking has been demonstrated as the most effective strategy for meeting regional air quality and transportation goals.

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.



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.

B21-41  
(cont.)

**Other mitigation strategies that should be made standard in the MSASP**

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:

B21-42

- capturing and reusing all rainwater on site
- using recycled water with double piping throughout
- permeable paving throughout
- rain gardens along sidewalks and in open parking
- quiet road surface for noise reduction in high density areas - rubberized road surface
- mandatory solar energy - active and passive
- priority for electric vehicles, electric charging stations, lower parking rates for electric cars
- requiring a high sustainability standard - higher than the standard LEED Silver - for the plan area
- 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.
- and many others listed in the CAP.

B21- 43

B21- 44

B21- 45

B21- 46

B21- 47

B21- 48

B21- 49

B21- 50

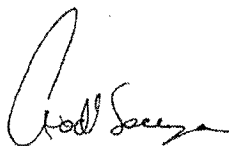
B21- 51

B21- 52

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.

B21-53

Respectfully submitted,



Gladwyn d'Souza,  
Chair, Transportation Committee



Gita Dev  
Co-Chair, Sustainable Land Use Committee

cc:

Mike Ferreira, Conservation Committee  
John Cordes, Ex. Director, Sierra Club Loma Prieta Chapter

**From:** Noveed Safipour <noveed.safipour@gmail.com>  
**Sent:** Monday, August 10, 2015 1:44 PM  
**To:** Soyeb Palya  
**Subject:** MSA EIR: Include impact of lack of housing on carbon emissions.

Greetings,

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.

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. 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 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.

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.

Please let me know if you require any further information to evaluate and consider this comment.

Soyeb Palya

Comment Letter B23

From: SchneiderAnn@juno.com  
Sent: Monday, August 10, 2015 3:42 PM  
To: MillbraeMSASPDIER@ci.millbrae.ca.us  
Cc: Ann Schneider  
Subject: Comments MSASP DEIR  
Attachments: MSASP and DEIR Comments from Ann Schneider.docx

City of Millbrae  
Community Development Department  
621 Magnolia Ave  
Millbrae CA 94030  
MillbraeMSASPDIER@ci.millbrae.ca.us

Monday, August 10, 2015

Dear City of Millbrae:

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. B23-1

Here are my concerns:

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. B23-2

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

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.

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 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. B23-3

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.

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.

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.

#### 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 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.

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.

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.

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.

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 self-sufficient.

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.

#### 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.

#### 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.

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.

#### 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 cars? 823-12 (Cont.)

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.

Sincerely,

Ann Schneider

406 Palm Ave.

Millbrae, CA 94030

650-697-6249 / SchneiderAnn@juno.com

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# Comment Letter B24

**From:** Chuck FANCHER [mailto:fancherco@msn.com]

**Sent:** Monday, August 10, 2015 4:45 PM

**To:** Christi Diiorio <CDiiorio@ci.millbrae.ca.us>; Marcia L. Raines <MRaines@ci.millbrae.ca.us>; Marty Van Duyn <MVanDuyn@ci.millbrae.ca.us>

**Cc:** 'Blake Pogue' <blake.pogue@ppc-usa.com>; 'Dan Rogers' <Drogers939@aol.com>;

elizabeth.cobb@sheaproperties.com; 'Landon Browning' <Landon.Browning@sheaproperties.com>

**Subject:** Comments relative to the Millbrae Station Area Specific Plan Update

Memo to: Community Development Director  
City Manager  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA 94030

Ms Diiorio – 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.

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. B24-1
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. B24-2
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. B24-3
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. B24-4

B24-5

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

B245  
(cont.)

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.

B246

Thank you. Chuck Fancher



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

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