

ALTERNATIVES TO THE SPECIFIC PLAN UPDATE

5.1 ALTERNATIVES TO THE SPECIFIC PLAN UPDATE

This sub-chapter provides a description of the alternatives to the Specific Plan Update, followed by an analysis of the potential direct, indirect and cumulative environmental impacts that could result from buildout under each alternative, including a determination of the level of significance of the potential environmental impacts that would occur under each specific alternative. In addition, this sub-chapter provides a discussion of how each alternative meets or fails to meet the project objectives. The existing baseline for each of these analyses would be the same as what is discussed throughout Chapter 3, Project Description, of this Draft EIR for the proposed Project. For existing conditions information, please refer to Chapter 3, Project Description, of this Draft EIR.

5.1.1 POTENTIALLY SIGNIFICANT IMPACTS

As previously stated, the choice of alternatives to the proposed Specific Plan Update for analysis in this Draft EIR focused on those that would further reduce and avoid the significant-but-mitigable impacts and those impacts found to be significant and unavoidable as shown in Table 5.1-1.

TABLE 5.1-1 SIGNIFICANT IMPACTS UNDER THE PROPOSED SPECIFIC PLAN UPDATE

Impact Statement by Topic	Conclusion
AIR QUALITY	
Impact AQ-SP-2.1: Future projects under the Specific Plan Update could result in fugitive dust (coarse inhalable particulate matter [PM ₁₀] and fine inhalable particulate matter [PM _{2.5}]) from construction activities that could violate air quality standards or contribute substantially to an existing or projected air quality violation and expose sensitive receptors to elevated concentrations of pollutants during construction activities.	SU
Impact AQ-SP-2.2: Operational phase emissions associated with the proposed Specific Plan Update would exceed BAAQMD's regional operational-phase significance thresholds for Volatile Organic Compounds (VOCs).	SU
Impact AQ-SP-3: Implementation of the proposed Specific Plan Update would exceed the Bay Area Air Quality Management Districts (BAAQMD's) regional significance thresholds.	SU
Impact AQ-SP-4.1: Construction activities associated with future development projects accommodated under the proposed Specific Plan Update could expose nearby receptors to substantial concentrations of Toxic Air Contaminants (TACs).	SU
Impact AQ-SP-4.2: Risks to sensitive receptors near sources of TACs could exceed the cancer risk and non-cancer hazard index.	LTS/M
BIOLOGICAL RESOURCES	
Impact BIO-SP-1.1: Implementation of the Specific Plan Update could result in inadvertent loss of bird nests in active use, which would conflict with the federal Migratory Bird Treaty Act and California Fish and Game Code if adequate controls and preconstruction surveys are not implemented.	LTS/M
Impact BIO-SP-1.2: Implementation of the Specific Plan Update could adversely affect the pallid bat if adequate controls are not implemented.	LTS/M

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TABLE 5.1-1 SIGNIFICANT IMPACTS UNDER THE PROPOSED SPECIFIC PLAN UPDATE

Impact Statement by Topic	Conclusion
CULTURAL RESOURCES	
Impact CULT-SP-1: Implementation of the Specific Plan Update could adversely affect current and future historical resources.	SU
Impact CULT-SP-2: Implementation of the Specific Plan Update would have the potential to cause a significant impact to an archaeological resource pursuant to CEQA Guidelines Section 15064.5.	LTS/M
Impact CULT-SP-3: Implementation of the Specific Plan Update would have the potential to directly or indirectly affect a unique paleontological resource or site, or unique geologic feature.	LTS/M
GEOLOGY, SOILS, AND SEISMICITY	
Impact GEO-SP-1: Implementation of the Specific Plan Update could expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving surface rupture along a known active fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction and landslides.	LTS/M
Impact GEO-SP-3: Implementation of the Specific Plan Update could result in a significant impact related to development on unstable geologic units and soils or result in lateral spreading, subsidence, liquefaction, or collapse.	LTS/M
Impact GEO-SP-4: Implementation of the Specific Plan Update could create substantial risks to property as a result of its location on expansive soil, as defined by Section 1803.5.3 of the California Building Code.	LTS/M
HAZARDS AND HAZARDOUS MATERIALS	
Impact HAZ-SP-4: Implementation of the Specific Plan Update would occur on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.	LTS/M
TRANSPORTATION AND CIRCULATION	
Impact TRANS-SP-1.1: Implementation of the Specific Plan Update would result in the addition of traffic to intersection #4 El Camino Real/Millbrae Avenue causing this intersection to degrade from LOS D to LOS F in the AM peak hour and would add more than five (5) seconds of delay in the PM peak hour (currently operating at LOS E), resulting in LOS F under Existing Plus Project conditions.	SU
Impact TRANS-SP-1.2: Implementation of the Specific Plan Update would result in the addition of traffic volumes to freeway segments currently operating over capacity and Specific Plan Update-generated traffic would add more than one (1) percent of the segment's capacity at the following locations: <ul style="list-style-type: none"> ▪ Northbound US 101 from Millbrae Avenue to Broadway – AM peak hour ▪ Northbound US 101 from Broadway to Peninsula Avenue – AM peak hour 	SU
Impact TRANS-SP-1.3: Implementation of the Specific Plan Update would contribute a considerable level of traffic and increase the average vehicle delay by more than five (5) seconds at the intersection #4 El Camino Real/Millbrae Avenue during the AM and PM peak hour.	SU
Impact TRANS-SP-1.4: Implementation of the Specific Plan Update would contribute a considerable level of traffic to intersection #5 El Camino Real/Murchison Drive and cause this intersection to degrade from LOS D to LOS E in the PM peak hour under Cumulative (2040) Plus Project (Specific Plan Update) conditions.	SU
Impact TRANS-SP-1.5: Implementation of the Specific Plan would contribute a considerable level of traffic to intersection #7 California Drive/Murchison Drive and cause this intersection to degrade from LOS D to LOS F in the AM and PM peak hour under Cumulative (2040) Plus Project (Specific Plan Update) conditions. In addition, the intersection meets the Caltrans peak hour signal warrant for urbanized areas (Warrant 3).	SU
Impact TRANS-SP-1.6: Implementation of the Specific Plan Update would contribute a considerable level of traffic to intersection #8 Rollins Road/Millbrae Avenue and cause this intersection to degrade from LOS D to LOS F in the AM and PM peak hour under Cumulative (2040) Plus Project (Specific Plan Update) conditions.	SU
Impact TRANS-SP-1.7: Under Cumulative (2040) Plus Project (Specific Plan Update) conditions, the Specific Plan Update would add traffic volumes representing more than one (1) percent of the segment's capacity to the following freeway segments exceeding the capacity without the Specific Plan Update:	SU

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TABLE 5.1-1 SIGNIFICANT IMPACTS UNDER THE PROPOSED SPECIFIC PLAN UPDATE

Impact Statement by Topic	Conclusion
Northbound and Southbound US 101 Grand Avenue to Produce Avenue – AM and PM peak hours	
Northbound US 101 Produce Avenue to I-380 – AM peak hour	
Northbound US 101 I-380 to Millbrae Avenue – AM peak hour	
Northbound and Southbound US 101 Millbrae Avenue to Broadway – AM and PM peak hours	
Northbound and Southbound US 101 Broadway to Peninsula Avenue – AM and PM peak hours	
Impact TRANS-SP-2: As discussed under TRANS-1, implementation of the Specific Plan Update would result in a <i>significant</i> impact at the CMP facilities during at least one (1) of the peak hours under Existing (2014) and Cumulative (2040) conditions as follows:	
Existing (2014) Plus Project (Specific Plan Update)	
<ul style="list-style-type: none"> ▪ El Camino Real/Millbrae Avenue – AM and PM peak hour ▪ Northbound US 101 from Millbrae Avenue to Broadway – AM peak hour ▪ Northbound US 101 from Broadway to Peninsula Avenue – AM peak hour 	
Cumulative (2040) Plus Project (Specific Plan Update)	SU
<ul style="list-style-type: none"> ▪ El Camino Real/Millbrae Avenue – AM and PM peak hour ▪ Northbound and Southbound US 101 Grand Avenue to Produce Avenue – AM and PM peak hours ▪ Northbound US 101 Produce Avenue to I-380 – AM peak hour ▪ Northbound US 101 I-380 to Millbrae Avenue – AM peak hour ▪ Northbound and Southbound US 101 Millbrae Avenue to Broadway – AM and PM peak hours ▪ Northbound and Southbound US 101 Broadway to Peninsula Avenue – AM and PM peak hours 	
Impact TRANS-SP-4: Queues that were already exceeding available storage space under Existing (2014) conditions were exacerbated under Existing (2014) Plus Project (Specific Plan Update) conditions at and between the intersections of El Camino Real/Millbrae Avenue and Rollins Road/Millbrae Avenue resulting in hazardous driving conditions from backed up traffic.	SU
UTILITIES AND SERVICE SYSTEMS	
Water Supply	
Impact UTIL-SP-1: With implementation of the proposed Specific Plan Update Plan there would not be sufficient water supplies available to serve the proposed Project from existing entitlements and resources during multiple dry years.	SU
Notes:	
SU	Significant and Unavoidable
LTS/M	Less Than Significant with Mitigation

5.1.2 PROJECT OBJECTIVES

The primary intent of the proposed Specific Plan Update is to revise the 1998 Specific Plan to facilitate new Class A office, retail, hotel and residential development in proximity to the Millbrae Station to respond to changing market conditions and demographic shifts, while considering other planning goals, such as enhancing pedestrian mobility, bicycle circulation, and transit access. The City has developed the following project objectives that are

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meant to aid decision-makers in their review of the proposed Specific Plan Update, the alternatives to the proposed Specific Plan Update, and associated environmental impacts:

- Update and refine the vision for the Specific Plan Area for a 25-year buildout (2040) horizon that responds to ongoing changing market conditions and demographic shifts and citywide and regional multi-modal transportation goals.
- Ensure the Specific Plan Update will strengthen the City's economic base by supporting economic development, and enhance and revitalize commercial areas.
- Establish new goals and policies intended to facilitate the achievement of a 25-year buildout horizon for the Specific Plan Area.
- Ensure a Specific Plan that is consistent with the City's Priority Development Area (PDA) designation by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) through the Bay Area's Regional FOCUS program, and therefore encourages high density development in close proximity to transit nodes that will help to reduce greenhouse gas emissions through a reduction in vehicle trips.
- Reconsider and designate the Specific Plan Area for appropriate new land uses, including eliminating underutilized industrial and non-retail land uses, to implement the updated vision of the Specific Plan.
- Plan for opportunities for increased use of transit, pedestrian and bicycles within the Specific Plan Area.
- Identify recommendations for circulation and physical improvements required to support a 25-year buildout horizon of the Specific Plan Area, all of which prioritize pedestrian mobility, bicycle access, and transit access.
- Create updated building and design standards for new development that respond to changing market forces and demographic shifts, and facilitate multi-modal transportation in the Specific Plan Area.
- Create updated building and design standards that minimize the impact of new development on the character of surrounding residential neighborhoods.
- Provide an implementation strategy and conceptual financing plan for achieving the goals of the Specific Plan Update over a 25-year buildout the Specific Plan Area.
- Facilitate the redevelopment of the underutilized portions of the Specific Plan Area with a Class A office corridor south of Adrian Road, residentially-focused mixed-use development along El Camino Real, and a highly flexible mix of uses in the areas immediately surround the BART station to the west, east, and south.
- Permit and encourage hotels flexibly within all portions of the Specific Plan Area.
- Create policies that balance between minimization of vehicular parking to discourage auto use and foster a walkable and bikeable urban environment with ensuring project viability.

5.1.3 ALTERNATIVES ANALYSIS

In accordance with the CEQA Guidelines, the alternatives and the comparative merits of the alternatives are discussed below. As previously stated, the alternatives were selected because of their potential to reduce the significant impacts of the proposed Specific Plan Update shown in Table 5.1-1. The alternatives to be analyzed in comparison to the proposed Specific Plan Update include:

- No Project Alternative
- Lower Intensity Alternative

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The first alternative discussed is the CEQA-required No Project Alternative. The second alternative presents a lower intensity growth scenario when compared to the proposed Specific Plan Update, but within the same general land use patterns. The proposed new development for each alternative scenario and the estimated buildout of each alternative is provided in Table 5.1-2.

TABLE 5.1-2 DEVELOPMENT POTENTIAL COMPARISONS OF ALTERNATIVES TO THE PROPOSED SPECIFIC PLAN UPDATE

Category	Net Development Potential			2040 Buildout Potential		
	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
Office (SF)	1,577,235	917,000	1,485,585	1,653,340	993,500	1,561,685
Industrial/Non-Retail (SF) ^a	-335,240	-293,440	-335,240	0	41,800	0
Retail (SF)	142,535	45,900	88,345	275,110	240,975	220,920
Residential (Units) ^b	1,440	115	604	1,750	423	912
Hotel (Rooms)	325	961	325	370	1,000	364
Population ^c	3,808	304	1,601	4,640	1,121	2,417
Employees ^d	6,590	4,552	6,424	7,600	5,419	7,091

Notes: SF = square feet, TOD = transit-oriented development

a. The proposed Project would not include Industrial/Non-Retail land uses.

b. The proposed residential development would be multi-family units.

c. Population is based on 2.65 persons per dwelling units consistent with U.S. Census Bureau's 2005-2009 American Community Survey 5 year estimates. Temporary residents associated with the hotel, not shown on this table, are estimated at an average of 2 persons per room as part of the environmental review for this Draft EIR.

d. Jobs are calculated by applying 1 job/250 sf for office; 1 job/400 sf for retail; 1 job/1,000 sf industrial/non-retail; and 1 job per 1.25 hotel rooms.

5.1.3.1 NO PROJECT ALTERNATIVE

Description

Pursuant to CEQA Guidelines Section 15126.6(e)(1), the No Project Alternative is required as part of the “reasonable range of alternatives” to allow decision makers to compare the impacts of approving the proposed Specific Plan Update with the impacts of taking no action or not approving the proposed Specific Plan Update. Under this alternative, the proposed Specific Plan Update would not be adopted, and the Specific Plan Area would be developed consistent with the 1998 Millbrae Station Area Specific Plan as amended by the City Council in 2002 (1998 Specific Plan).

As shown in Table 5.1-2, the No Project Alternative would result in less office, retail and residential development, and more hotel development, when compared to the proposed Specific Plan Update. The maximum height permitted under the 1998 Specific Plan would be 75 feet.

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The federal and State Regulations, General Plan policies, and Municipal Code development standards that apply to the proposed Specific Plan Update, would also apply to this Alternative, and all mitigation measures listed in Chapters 4.1 through 4.14 would also apply to their respective impacts under this Alternative.

The differences between the proposed Specific Plan Update and the No Project Alternative would be incremental and even if no action was taken, regional growth, and the associated environmental effects linked to this growth, would continue to occur under the provisions of the current 1998 Specific Plan.

Impact Discussion

The potential environmental impacts associated with the No Project Alternative are described below and are compared to the Specific Plan Update. The impacts of each alternative are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the proposed Specific Plan Update.

Aesthetics

Chapter 4.1, Aesthetics, finds that the proposed Specific Plan Update would result in less-than-significant impacts to aesthetics. As described in detail in Section 4.1.1.2, Existing Conditions, in Chapter 4.1, Aesthetics, of this Draft EIR, the Specific Plan Area where potential future development is expected to occur is concentrated on parcels within the current Specific Plan Area in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development, where future development would have a lesser impact on scenic vistas. Under the No Project Alternative, the proposed increases in maximum height, as shown on Figure 3-10 in Chapter 3, Project Description of this Draft EIR, would not occur, which would somewhat lessen the impacts to far-field views of the scenic vistas from various vantage points surrounding the Specific Plan Area. Future development under the No Project Alternative would not further block or obstruct public views of scenic vistas from within the city or surrounding areas. Similar views would continue to be visible between projects and over lower density areas. Considering this and the fact that the Specific Plan Area and surrounding roadways are not considered destination public viewing points nor are they visible from scenic vistas, overall impacts to scenic vistas under the No Project Alternative would be *similar* to impacts under the Specific Plan Update.

The visual character of the Specific Plan Area exhibits predominantly an auto-oriented urban character and is largely comprised of retail commercial and light industrial uses in buildings that are not architecturally notable. Future development under the No Project Alternative would still be subject to the City's Design Review process and to existing General Plan policies identified in Chapter 4.1, Aesthetics, of this Draft EIR, that aim to protect the visual character of Millbrae. Although future development under the No Project Alternative would change the existing visual character on individual sites, compliance with these regulations would ensure that the bulk, mass, height, and architectural character of future development in the Specific Plan Area would be compatible with surrounding uses and would not substantially degrade the visual quality of the site or its surroundings. Therefore, associated impacts under the No Project Alternative would be *similar* to those under the Specific Plan Update.

Currently, the Specific Plan Area contains many existing sources of nighttime illumination. These include street and parking area lights, security lighting, and exterior lighting on existing residential and commercial buildings. Additional onsite light and glare is caused by surrounding land uses and traffic on El Camino Real, Millbrae Avenue and Highway 101. Future development under the No Project Alternative would be subject to the City's

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Design Review Process per General Plan Policy LU2.1, which requires quality site planning, architecture and landscape design for all new development, renovation or remodeling. The Design Review Process would include compliance with the Design Guidelines set forth in the currently-adopted 1998 Specific Plan Update. Furthermore, the City has adopted the California Building Code per Municipal Code Section 9.05.010, which includes standards for outdoor lighting that are intended to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls. Overall, interior and exterior lighting provided by the No Project Alternative would be consistent with the urbanized context of the Specific Plan Area and would not be considered substantial. Accordingly, future development under the No Project Alternative would not create substantial light and glare such that could degrade daytime or nighttime views, or pose a hazard to drivers on nearby roadways. Therefore, associated impacts under the No Project Alternative would be *similar* to those under the Specific Plan Update.

In summary, Chapter 4.1 finds that potential impacts from future development under the Specific Plan Update would be avoided through consistency with General Plan policies and Zoning Ordinance performance standards that would also apply to new development under the No Project Alternative. Under both scenarios, future projects would be subject to the City's Design Review process. In addition, development in the Specific Plan Area under the No Project Alternative would be required to comply with the 1998 Specific Plan. Therefore, potential aesthetics impacts under the No Project Alternative would be *similar* when compared to the Specific Plan Update.

Air Quality

As described in Chapter 4.2, Air Quality, the proposed Specific Plan Update would result in four significant and unavoidable impacts, and one significant impact that would be mitigated to a less-than-significant level with the implementation of Mitigation Measure AQ-SP-4.2 (operational health risk assessment).

Specifically, development allowed by the proposed Specific Plan Update would generate a substantial increase in criteria air pollutant emissions that exceeds the Bay Area Air Quality Management District (BAAQMD) regional significance thresholds. Operational criteria air pollutant emissions would be generated from on-site area sources (e.g. landscaping fuel and consumer products), vehicle trips generated by implementation of the proposed Specific Plan Update, and energy use (e.g. natural gas used for cooking and heating). Fugitive dust particulate matter levels downwind of actively disturbed areas during construction activities could violate air quality standards or contribute substantially to an existing or projected air quality violation and expose sensitive receptors to elevated concentrations of pollutants. Impacts, including cumulative impacts, associated with these effects would be significant and unavoidable. In addition, future projects that would place sensitive receptors within 1,000 feet of major sources of toxic air contaminants (TACs) would need to ensure that they could achieve BAAQMD's performance standards through the implementation of Mitigation Measures AQ-SP-4.1 (construction health risk assessment) and AQ-SP-4.2 (operational health risk assessment).

The No Project Alternative would allow less office, retail and residential, but more hotel redevelopment in the Specific Plan Area under the City's existing 1998 Specific Plan and Zoning Ordinance. Under the No Project Alternative, the reduced office, retail and residential development would reduce impacts associated with the construction and operation of these land uses. Additionally, Mitigation Measures AQ-SP-2.1a through AQ-SP-2.1c that would reduce air quality impacts would also apply to the development under the No Project Alternative. However, reducing office, retail and residential near the Millbrae Station could lessen the net benefit gained from siting these land uses near public transit and result in a higher percentage of transit users that may rely on

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automobiles (as opposed to walking or biking) to and from the Specific Plan Area. Therefore, as a result of reducing development, the No Project Alternative would not necessarily reduce trips, which are the major source of criteria air pollutants from the Specific Plan Update. However, because the No Project Alternative would result in less overall development than the proposed Specific Plan Update, air quality impacts would from the operation of these uses would be *less*.

Same as the proposed Specific Plan Update, the No Project Alternative is not the type of project that would result in significant impacts from odor and impacts would be *similar* under both scenarios.

Overall, because the No Project Alternative would result in less development, air quality impacts under the No Project Alternative would be *less* when compared to the proposed Specific Plan Update.

Biological Resources

As discussed in Chapter 4.3, Biological Resources, the Specific Plan Area is built out and urbanized, which greatly limits the likelihood of continued occurrence of most special-status plant and animal species. However, redevelopment allowed under the Specific Plan Update and the No Project Alternative would have the potential to adversely affect pallid bats, a special-status species that roosts in crevices and abandoned buildings, as well as one or more species of birds protected under the Migratory Bird Treaty Act and State Fish and Game Code. This impact would be mitigated to a less-than-significant level through the implementation of Mitigation Measures BIO-SP-1.1 and BIO-SP-1.2, which would also apply to future development under the No Project Alternative. While development would be less intensive under the 1998 Specific Plan, the same area would be impacted; therefore, impacts to special-status species would be *similar* under both scenarios.

As described in Chapter 4.3, there are no riparian corridors; sensitive natural communities; or established wildlife corridors within or adjoining the Specific Plan Area. In addition, there are no riparian resources or sensitive natural communities within the Specific Plan Area. Impacts would be *similar* under both scenarios.

In summary, due to lack of biological resources under the existing conditions in the Specific Plan Area and because both the No Project Alternative and the Specific Plan Update would occur in the same area, impacts to biological resources under the No Project Alternative would be *similar* when compared to the Specific Plan Update.

Cultural Resources

Chapter 4.4, Cultural Resources, finds that the Specific Plan Update would result in three significant impacts, as future redevelopment allowed by the Specific Plan Update would have the potential to adversely affect historic buildings and structures or uncover unknown paleontological or archaeological resources. These impacts would be mitigated to less-than-significant levels through the implementation of Mitigation Measures CULT-SP-1 through CULT-SP-3. Redevelopment under the No Project Alternative would also involve infill development that could affect historic structures or unknown paleontological or archeological resources. Under the No Project Alternative these potential impacts would be *similar* when compared to the Specific Plan Update.

Chapter 4.4 finds that applicable regulations, procedures, and policies would ensure that any human remains discovered during construction allowed by the Specific Plan Update would be handled appropriately. These

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regulations, procedures, and policies would be maintained under the No Project Alternative, and therefore this alternative would result in *similar* impacts to human remains when compared to the proposed Specific Plan Update.

In summary, the proposed Specific Plan Update and the No Project Alternative would result in the same significant-but-mitigable cultural resource impacts. Therefore, the No Project Alternative would be *similar* to the Specific Plan Update.

Geology, Soils, and Seismicity

Chapter 4.5, Geology and Soils, finds that development allowed by the Specific Plan Update would result in significant-but-mitigable geology and soils impacts due to low risks for geologic hazards in the Specific Plan Area, coupled with existing applicable policies and building standards. There are no active faults within or adjacent to the Specific Plan Area, the potential for ground rupture, liquefaction, and unstable geologic units is considered low, and the generally flat terrain of the Specific Plan Area would limit landslide and erosion risks. New development would be subject to the California Building Code and the risk reduction policies in the City's General Plan that would address and prevent hazards associated with geology, soils, and seismicity. Implementation of Mitigation Measures GEO-SP-1 would require future development under the Specific Plan Update to prepare and comply with site-specific geotechnical investigations.

In summary, the existing conditions would be the same under both scenarios and the City's building standards and policies would also apply to new development allowed under the No Project Alternative. Therefore, the impacts related to geology and soils under the No Project Alternative would be *similar* to those under the Specific Plan Update.

Greenhouse Gas Emissions

As described in Chapter 4.6 of this Draft EIR, the proposed Specific Plan Update would result in less-than-significant GHG emissions impacts.

The No Project Alternative would allow future redevelopment in the Specific Plan Area under the City's existing 1998 Specific Plan and Zoning Ordinance. The No Project Alternative would allow less office, retail and residential, but more hotel redevelopment in the Specific Plan Area under the City's existing 1998 Specific Plan and Zoning Ordinance. Under the No Project Alternative, the reduced office, retail and residential development would reduce GHG emissions associated with the construction and operation of these uses. However, reducing these types of land uses near the Millbrae Station could lessen the net benefit in reducing vehicle trips by siting these land use near public transit and result in a higher percentage of transit users that may rely on automobiles (as opposed to walking or biking) to get to and from the Specific Plan Area. In addition, the greater hotel development would result in more hotel-user trips. Therefore, the No Project Alternative would not necessarily reduce automobile trips as a result of reducing development, which are the major source of GHG emissions from the Specific Plan Update.

In summary, because the No Project Alternative proposes less development, than the Specific Plan Update, GHG emissions impacts under the No Project Alternative would be *less* when compared to the Specific Plan Update.

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Hazards and Hazardous Materials

Chapter 4.7, Hazards and Hazardous Materials, finds that the Specific Plan Update would result in less-than-significant hazards and hazardous materials impacts with implementation of Mitigation Measure HAZ-SP-4a through HAZ-SP-4b.

Development under the No Project Alternative would occur under the 1998 Specific Plan, and like the proposed Specific Plan Update would include construction activities that could involve the routine transport, use, and disposal of hazardous materials, and new development could involve the handling, use, and storage of hazardous materials. As described in Chapter 4.7, the Specific Plan Area contains leaking underground storage tanks (LUST) sites, permitted underground storage tanks (USTs), and multiple sites reporting to the United States Environmental Protection Agency (US EPA) that are listed in the US EPA's EnviroMapper database. Existing regulations, procedures, and policies and implementation of Mitigation Measure HAZ-SP-4a through HAZ-SP-4b would ensure that impacts are less than significant and that the potential accidental release of hazardous materials is prevented and handled appropriately. These existing regulations, procedures, and policies would be maintained under the No Project Alternative and the same mitigation measures would be required under both scenarios.

The Specific Plan Area is within areas of the San Francisco International Airport (SFO) Airport Land Use Compatibility Plan (ALUCP) that limits land use and building height to minimize impacts to people residing or working in the Specific Plan Area. Future development under both the Specific Plan Update and the No Project Alternative would be required to be consistent with ALUCP's Policy AP-3, which establishes the procedures for determining the maximum compatible building height. Future development under the Specific Plan Update and the No Project Alternative would occur within SFO Safety Compatibility Zone 1, Zone 2, and Zone 3, as shown in Figure 4.7-1, and future development under the No Project Alternative would be required to be compatible with each Zone's applicable land use criteria. Because the types of development under both the Specific Plan Update and the No Project Alternative would be the same, neither development scenario would subject people or structures to substantial airport related hazards.

As discussed in Chapter 4.7, Hazards and Hazardous Materials, the City has adopted ABAG's multi-jurisdictional Local Hazard Mitigation Plan for the San Francisco Bay Area, as modified for the City's Local Hazard Mitigation. Compliance with the provisions of the California Fire Code and the California Building Code would ensure that buildout of the No Project Alternative would result in *similar* impacts to the Specific Plan Update with respect to interference with an adopted emergency response plan or emergency evacuation plan.

In summary, the existing conditions would be the same under both scenarios and the federal, State and local regulatory standards would also apply to new development allowed under the No Project Alternative. Therefore, the hazards and hazardous materials impacts under the No Project Alternative would be *similar* to those under the Specific Plan Update.

Hydrology and Water Quality

Chapter 4.8, Hydrology and Water Quality, finds that the Specific Plan Update would result in less-than-significant hydrological impacts. Compliance with existing State and local regulations and procedures would ensure that pre-

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and post-construction impacts to water quality would be less than significant. These regulations and procedures would be maintained under the No Project Alternative.

The Specific Plan Area is urbanized, and development under either the Specific Plan Update or No Project Alternative would not rely on groundwater supplies or interfere with existing groundwater recharge.

The Specific Plan Area does not contain a stream, river, or other drainage facility, apart from the city's storm drain system. Development allowed by either the Specific Plan Update or the No Project Alternative would connect to the City's storm drain system and would not substantially change existing drainage patterns.

The Specific Plan Area is already built out with impervious surface and the proposed development should not significantly increase the amount of runoff from the site, especially with the requirement to implement C.3 stormwater control provisions. Under the Specific Plan Update, some existing storm drain culverts will be relocated and new interior storm drain collector systems would be required. Since the Specific Plan Area is almost completely built out, the drainage areas and runoff coefficients under both the Specific Plan Update and No Project Alternative would remain *similar* to existing conditions.

No portions of the Specific Plan Area are within a flood zone. Therefore, housing and other structures allowed by either the Specific Plan Update or the No Project Alternative would not be constructed within a 100-year floodplain.

There are no mapped dam inundation areas within the city or within the Specific Plan Area. In addition, the Specific Plan Area is not within the mapped tsunami inundation area. Therefore, it will not be subject to flooding from a tsunami. There are no nearby reservoirs or aboveground storage tanks that could result in a seiche impacting the Specific Plan Area, and if a seiche were to occur in San Francisco Bay, it would not impact the Specific Plan Area, because the impact would not extend beyond the tsunami inundation zone.

In summary, impacts under the No Project Alternative would be *similar* when compared to the Specific Plan Update.

Land Use and Planning

As discussed in Chapter 4.9, Land Use and Planning, the Specific Plan Update would result in no land use and planning impacts. The Specific Plan Update would aim to improve connectivity and would not create physical barriers within existing communities. Similarly, the No Project Alternative supports the integration of the infill development and does not propose physical features that could divide a community.

The ABAG and the Metropolitan Transportation Commission (MTC), in coordination with BAAQMD and the Bay Conservation and Development Commission (BCDC), jointly created the Sustainable Communities Strategy (SCS) for the nine-county Bay Area region, entitled *Plan Bay Area*. *Plan Bay Area* identifies the Specific Plan Area as a PDA, in which transit-oriented and infill development is encouraged. The Specific Plan Update is consistent with the goals of *Plan Bay Area* by focusing on mixed-use and TOD, providing better connectivity between the Specific Plan Area and adjacent land uses, and providing mixed-use development near the Millbrae Station. New development allowed under the No Project Alternative would also redevelop the Specific Plan Area with transit-

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supportive uses; however, the reduced development under the No Project Alternative would not provide the same intensive development and therefore, would not be consistent with these goals.

The Specific Plan Area is within the Safety Compatibility Zones 2 and 3 of the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (SFO ALCUP). Like the Specific Plan Update, the land uses under this alternative would be consistent with the SFO ALCUP.

BART's TOD Policy seeks to promote high quality, more intensive development on and near BART stations. The Specific Plan Update is consistent with the TOD Policy because it would locate new housing, retail space, office space, and hotel rooms in close proximity, and in some cases immediately adjacent to the Millbrae Station, and because many of its future residents and employees would be expected to ride BART and/or Caltrain for commute or recreational trips instead of driving. Similarly, the No Project Alternative would locate new office, retail, residential and hotel uses in the Specific Plan Area. It is expected that future users of these land uses would also use BART and/or Caltrain for many trips, as under the Specific Plan Update; however, the less intensive development without as much residential development under the No Project Alternative would not be consistent with these policies.

In summary, the No Project Alternative's reduced level of development would not be consistent with the goals and policies of *Plan Bay Area* or the BART TOD policies that support more intensive development on and near transit stations. Therefore, the land use consistency impacts under the No Project Alternative would be *greater* when compared to those under the Specific Plan Update.

Noise

Future development under the designations of the Specific Plan Update would be subject to the standards of the Municipal Code, including those relating to the interface between residential and non-residential land uses. As specific uses are proposed for particular sites, project-level design, permitting, and environmental review would serve to ensure that individual uses would comply with the provisions of the noise chapter. Additionally, by including appropriate buffers, berms, barriers, or other site design features, development of uses under the Specific Plan Update would comply with the applicable General Plan policies and Municipal Code performance standards. The No Project Alternative would also be subject to these applicable standards.

Compliance with relevant General Plan policies and provisions of the Municipal Code, including those that restrict construction activities to occur during daytime hours, would serve to ensure that noise from construction impacts and stationary noise sources associated with development of new land uses under the No Project Alternative would not result in significant permanent increases in the ambient noise level in the Specific Plan Area and vicinity.

The Specific Plan Area falls within the SFO ALUCP area. With the exception of the area southwest of El Camino Real, the Specific Plan Area is within at least the 65 dBA Community Noise Equivalent Level (CNEL) Airport Noise Contour, according to Map 7-1, Noise Contours, in the Noise Element of the General Plan. Through the implementation of the applicable federal, State and General Plan policies and Municipal Code performance standards related to airport noise, the No Project Alternative would seek to minimize aircraft noise levels to the maximum extent feasible.

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In summary, noise related impact from future development under the No Project Alternative would be *similar* to those under the Specific Plan Update.

Population and Housing

As discussed in Chapter 4.11, the Specific Plan Update would not exceed ABAG projections for housing and population in the Transit Station Area PDA, and employment growth in the Specific Plan Area would support the ABAG policies and the City's General Plan Policy LU3.7 regarding a jobs/housing balance. The 304 new residents expected from the No Project Alternative represent about 3.5 percent of ABAG's population projection for the city by 2040.¹ Implementation of the No Project Alternative could generate as many as 423 new housing units upon buildout. Accordingly, implementation of the No Project Alternative would not exceed ABAG's projection for the Transit Station Area PDA, which will accommodate 2,420 housing units between 2010 and 2040. Overall, the additional housing units and population resulting from implementation of the No Project Alternative would not exceed regional projections.

ABAG projects an increase of 2,430 jobs in Millbrae by the year 2040.² The No Project Alternative is expected to result in 5,491 jobs of which 4,552 would be new jobs in Millbrae. These new jobs would exceed the regional job projections by 3,151 jobs. As with the Specific Plan Update, this additional growth under the No Project Alternative would be consistent with the regional planning objectives established for the Bay Area, and would come incrementally over a period of approximately 25 years. Furthermore, a policy framework is in place to ensure adequate planning occurs to accommodate this Alternative. Therefore, impacts under the No Project Alternative would be *similar* to those under the Specific Plan Update.

The No Project Alternative would allow a net increase of residential, retail space, office space, and hotel uses in the Specific Plan Area. The TOD #1 project site has one housing unit. Since implementation of the No Project Alternative would result in a net increase in housing, it would not require replacement housing outside the Specific Plan Area in the event that the housing unit is displaced. Therefore, impacts under the No Project Alternative would be *similar* to those under the Specific Plan Update.

In summary, while the Lower Intensity Alternative would result in a different buildout potential, impacts related to population and housing would be *similar* when compared to the Specific Plan Update.

Public Services and Recreation

Fire and Police Services

As discussed in Chapter 4.12, the Specific Plan Update's potential impacts associated with expansion of Central County Fire Department (CCFD) facilities would be less than significant. In addition, the Specific Plan Update would not require additional Millbrae Police Bureau (MPB) or BART Police Department staffing or facilities. The No Project Alternative would generate fewer new residents and workers in the Specific Plan Area than the Specific

¹ ABAG projects 8,768 new residents in Millbrae between 2010 and 2040. See Table 4.11-2 in Chapter 4.11, Population and Housing.

² ABAG projects 2,430 new jobs in Millbrae between 2010 and 2040. See Table 4.11-2 in Chapter 4.11, Population and Housing.

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Plan Update, and therefore, would result in fewer demands on the CCFD and the MPB or BART Police Department.

Schools

Buildout of the No Project Alternative would result in 423 residential units.

Applying the Millbrae Elementary School District (MESD) student generation rates of 0.4 students per household for grades kindergarten to 6th grade (K-6th), and 0.1 students per household for 7th to 8th grade, this alternative would be expected to generate approximately 170 students in K-6th grade and 43 new in 7th and 8th grade, compared to 700 K-6th grade and 175 7th and 8th grade students³ under the Specific Plan Update, in the MESD. Applying a San Mateo Union High School District (SMUHSD) student generation rate of 0.2 students per unit, this alternative would generate approximately 85 high school students, compared to 350 students⁴ under the Specific Plan Update.

Buildout of the No Project Alternative would occur over the course of 25 years, and like the proposed Specific Plan Update, would result in a gradual increase in demand for school services. Furthermore, as some of the proposed residential units would be studio and one-bedroom units accommodating single residents and couples without children, it is likely that the student generation estimates are high; thereby, allowing for a conservative analysis of potential impacts to schools.

Like development under the proposed Specific Plan Update, development under the No Project Alternative would be subject to development impact fees in accordance with the provisions of SB 50, as well as parcel taxes. The payment of development impact fees is deemed to fully mitigate the impacts of new development on school facilities, per California Government Code Section 65995.

In summary, while future development under each scenario would be required to pay development impact fees to fully mitigate impacts to schools, the No Project Alternative would generate less residential growth and subsequently fewer students, and impacts would be *less* when compared to the proposed Specific Plan Update.

Libraries

The Specific Plan Update would not require the physical expansion of library facilities. The No Project Alternative would generate fewer new residents; thus, fewer primary users of the library, e.g. families with children, would result in the Specific Plan Area than the Specific Plan Update, and therefore, would place fewer demands on San Mateo County Library (SMCL) facilities or resources.

Parks and Recreation

In addition, the Specific Plan Update would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered parks; would not result in substantial physical deterioration of

³ 1,750 units x 0.4 grades K-6th grade students per unit = 700 students. 1,750 units x 0.1 7th to 8th grade students = 175 students.

⁴ 1,750 units x 0.2 high school students per unit = 350 students

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existing neighborhood and regional parks or other recreational facilities; and would not include or require the construction or expansion of recreational facilities. The No Project Alternative would generate fewer residents; thus, fewer primary users of the parks, e.g. families with children, in the Specific Plan Area than the Specific Plan Update, and therefore, would place fewer demands on city parks or recreational facilities.

In summary, the No Project Alternative would place fewer demands on the public service providers to Millbrae; therefore, impacts under the No Project Alternative would be *less* when compared to the Specific Plan Update.

Transportation and Circulation

As discussed in Chapter 4.13, Transportation and Circulation, of this Draft EIR, the proposed Specific Plan Update would result in significant impacts at four intersections based on the City's intersection operations impact significance criteria. Even with implementation of mitigation measures, all but one would remain significant and unavoidable. In addition, the proposed Specific Plan Update would result in a significant and unavoidable impact because it would add traffic to freeway segments that operate below the Caltrans standard.

Under the No Project Alternative, less office, retail, residential and more hotel development would occur. The reduced office, retail and residential development would reduce trips and related congestion, but additional trips from hotel uses would occur. As discussed under Air Quality and GHG Emissions above, reducing these types of land uses in close proximity to the Millbrae Station could increase automobile trips to and from the Specific Plan Area, which could be offset by increasing the amount of development in the Specific Plan Area under the Specific Plan Update, thus reducing trips from residents in the Specific Plan Area that could work in the Specific Plan Area or walk to the Millbrae Station rather than drive. Therefore, the No Project Alternative would have *similar* impacts.

Chapter 4.13 finds that the proposed Specific Plan Update would not conflict with adopted transportation policies, plans, or programs regarding public transit, and bicycle and pedestrian facilities. The proposed Specific Plan Update contains policies supporting transit that are consistent with those in the General Plan; it also includes infrastructure improvements that encourage and anticipate increased transit use. Similarly, the Specific Plan Update proposes substantial improvements to pedestrian and bicycle infrastructure. The No Project Alternative would similarly not conflict with adopted policies, but it would also lack the infrastructure improvements that support transit, bicycles, and pedestrians that are called for in the proposed Specific Plan Update.

Although the Specific Plan Update would increase parking demand, Chapter 4.13 finds the proposed Specific Plan Update would provide adequate parking. The Specific Plan Update includes updated bicycle parking rates based on a sample of best practices conducted by Association of Pedestrian and Bicycle Professionals (APBP) and BART's 2002 *Bicycle Access and Parking Plan*, which is more representative of bicycle parking needs under current conditions than the City's existing Municipal Code. Nonetheless, the No Project Alternative would allow less development overall, which would reduce parking demands, and future development would be required to comply with the City's parking requirements; therefore, impacts would be *similar* under both scenarios.

Finally, through the City's comprehensive development review process and compliance with City Codes, the proposed Specific Plan Update would avoid impacts related to inadequate emergency access and hazards, and it would not result in a change in air traffic patterns. Development allowed under the No Project Alternative would be subject to the same development review process and City Codes, and it would impact regional air travel at a

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relatively reduced scale, so emergency access and air traffic pattern impacts would also be less than the Specific Plan Update. Under the proposed Specific Plan Update queuing hazards would occur due to traffic back-ups at two intersections; however, these intersections currently exceed available storage space. Accordingly, additional traffic from the No Project Alternative would also exacerbate this existing condition.

Overall, the No Project Alternative would have *less* transportation and circulation impacts when compared to the proposed Specific Plan Update. .

Utilities and Service Systems

Water

A Water Supply Assessment was prepared for the Specific Plan Update to determine the increase in water demand and assess the available water supply's ability to meet the demands of the proposed Specific Plan Update for normal, single dry, and multiple dry years. As discussed in Chapter 4.14, Utilities and Service Systems, with implementation of the proposed Specific Plan Update Plan there would not be sufficient water supplies available to serve the proposed Project from existing entitlements and resources during dry years.

As discussed in Chapter 4.14, Millbrae adopted its 2010 Urban Water Management Plan (UWMP) on June 14, 2011, by Resolution No. 11-17.⁵ The UWMP is a long-range planning document used to assess current and projected water usage, water supply planning and conservation and recycling efforts. The UWMP includes a Water Shortage Contingency Plan, described in Section 8 of the UWMP. Using the measures in the Water Shortage Contingency Plan to reduce the demands to the required supply availability, the UWMP estimates that Millbrae will have adequate supplies to meet demands during normal, single-dry, and multiple-dry years throughout the 25-year planning period of the UWMP (i.e. through 2035).

Improvements to the existing water distribution infrastructure would be required to meet the future demands in the Specific Plan Area under the proposed Specific Plan Update. Chapter 4.14, Utilities and Service Systems, finds that impacts associated with these improvements would be less than significant. Under the No Project Alternative, the 1998 Specific Plan would be maintained and like the proposed Specific Plan Update, future development would be required to comply with mandatory regulations as described in Chapter 4.14 and impacts would be similar. In summary, impacts to water supply under the No Project Alternative would be *less* than those under the Specific Plan Update due to the reduce development potential.

Wastewater

As discussed in Chapter 4.14, improvements to the existing wastewater treatment would not be required in order to meet the future demands in the Specific Plan Area under the Specific Plan Update; however, collection system infrastructure improvements will be required by applicants/developers of new projects with substantial sewer generation. Regardless, impacts associated with these improvements would be less than significant. The No Project Alternative would involve more hotel rooms, but less office space, retail space, and residential units than the

⁵ Consistent with the Urban Water Management Act, the UWMP must be updated every five years; accordingly, the City is in the process of updating their 2010 UWMP.

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Specific Plan Update, and therefore, would result in less wastewater infrastructure needs. Improvements would still be needed to serve new development, but may be *less* extensive.

Solid Waste

Solid waste from the Specific Plan Update would be less than two percent of the daily capacity (i.e. 3,598 tons/day) of the Ox Mountain Landfill, which receives 99 percent of Millbrae's solid waste. The solid waste generated from buildout of the Specific Plan Update is also less than three percent of the permitted daily capacity of the Recology Landfill, which has the smallest daily capacity (i.e. 2,400 tons/day) of any of the three landfills (along with Monterey Peninsula Landfill and Potrero Hills Landfill) that receive the remaining one percent of Millbrae's solid waste. In addition, compliance with the applicable regulations listed under UTIL-5 in Chapter 4.14 would ensure less-than-significant impacts associated with solid waste. Because the No Project Alternative would result in less growth than the Specific Plan Update, it would generate *less* solid waste, and impacts and impacts would be reduced from those of the Specific Plan Update.

Energy Conservation

Even with energy saving practices in place, new electrical connections, switches and/or transformers might be required to serve new structures and/or carry additional loads within the Specific Plan Area under the No Project Alternative. Similarly, new gas distribution lines and connections may be necessary. However, due to the Specific Plan Area's size and location within an urban development, buildout of the No Project Alternative would not significantly increase energy demands within the service territory and would not require new energy supply facilities. Transportation design features that are priorities of the Specific Plan Update would not be implemented under the No Project Alternative; however, compliance with the applicable General Plan Policies would be required to reduce energy impacts from transportation. New developments would be constructed using energy efficient modern building materials, construction practices, appliances and equipment, and would have to comply with the applicable General Plan policies, CALGreen Building Code and the other applicable state and local energy efficiency measures. This would ensure that significant energy conservation and savings would be realized from future development under the No Project Alternative. Because the No Project Alternative would result in less growth than the proposed Specific Plan Update, it would use *less* energy.

Overall, energy related impacts under the No Project Alternative, would be *less* than those under the proposed Specific Plan Update.

Relationship of the Alternative to the Objectives

As previously stated, the primary intent of the proposed Specific Plan Update is to revise the 1998 Specific Plan to facilitate new Class A office, retail, hotel and residential development in proximity to the Millbrae Station to respond to changing market conditions and demographic shifts, while considering other planning goals, such as enhancing pedestrian mobility, bicycle circulation, and transit access. The No Project Alternative would continue to maintain the 1998 Specific Plan; therefore, this Alternative would not meet the overall intent of the proposed Specific Plan Update.

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5.1.3.2 LOWER INTENSITY ALTERNATIVE

Description

Under the Lower Intensity Alternative, the overall development assumed for the Specific Plan Update would be substantially reduced by 30 percent from what is assumed in the proposed Specific Plan Update. However, the amount of the hotel development (325 rooms) in the Specific Plan Update would not be reduced under this Alternative.

The Lower Intensity Alternative would update the 1998 Specific Plan with the same land use and urban design concepts, and overall goals, polices and development standards of the proposed Specific Plan Update and would provide the same general mix of uses as that of the proposed Specific Plan Update. All planning zones under the proposed Specific Plan Update would remain the same under this Alternative, with the exception of the TOD Flex land use on the east side of the railroad tracks, where no residential land uses would be permitted under the Lower Intensity Alternative. Under this Alternative, the residential units assumed in the Specific Plan Update east of the tracks would be converted to office development.

As shown in Table 5.1-2, the Lower Intensity Alternative would result in less office, retail and residential development, and the same amount of hotel development when compared to the proposed Specific Plan Update. Although no specific maximum height has been determined for this Alternative, it is assumed that the maximum height permitted under this Alternative would be less than the Specific Plan Update because the reduced development potential would not require as much height.

The federal and State Regulations, General Plan policies, and Municipal Code development standards that apply to the proposed Specific Plan Update, would also apply to this Alternative, and all mitigation measures listed in Chapters 4.1 through 4.14 would also apply to their respective impacts under this Alternative.

The differences between the proposed Specific Plan Update and the Lower Intensity Alternative would be incremental and even if no action was taken, regional growth, and the associated environmental effects linked to this growth, would continue to occur under the provisions of the current 1998 Specific Plan.

Impact Discussion

The potential environmental impacts associated with the Lower Intensity Alternative are described below and are compared to the Specific Plan Update. The impacts of the alternative are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the proposed Specific Plan Update.

Aesthetics

Chapter 4.1, Aesthetics, finds that the proposed Specific Plan Update would result in less-than-significant impacts to aesthetics. As described in detail in Section 4.1.1.2, Existing Conditions, in Chapter 4.1, Aesthetics, of this Draft EIR, the Specific Plan Area where potential future development is expected to occur is concentrated on parcels within the current Specific Plan Area in the form of infill/intensification on sites either already developed and/or

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underutilized, and/or in close proximity to existing development, where future development would have a lesser impact on scenic vistas. Under the Lower Intensity Alternative, the proposed increases in maximum height as shown on Figure 3-10 in Chapter 3, Project Description of this Draft EIR, would be reduced, which would somewhat lessen the impacts to far-field views of the scenic vistas from various vantage points surrounding the Specific Plan Area. Future development under the Lower Intensity Alternative would not further block or obstruct public views of scenic vistas from within the city or surrounding areas. Similar views would continue to be visible between projects and over lower density areas. Considering this and the fact that the Specific Plan Area and surrounding roadways are not considered destination public viewing points nor are they visible from scenic vistas, overall impacts to scenic vistas under the Lower Intensity Alternative would be *similar* to impacts under the Specific Plan Update.

The visual character of the Specific Plan Area exhibits predominantly an auto-oriented urban character and is largely comprised of retail commercial and light industrial uses in buildings that are not architecturally notable. Future development under the Lower Intensity Alternative would still be subject to the City's Design Review process and to existing General Plan policies identified in Chapter 4.1, Aesthetics, of this Draft EIR, that aim to protect the visual character of Millbrae. Although future development under the Lower Intensity Alternative would change the existing visual character on individual sites, compliance with these regulations would ensure that the bulk, mass, height, and architectural character of future development in the Specific Plan Area would be compatible with surrounding uses and would not substantially degrade the visual quality of the site or its surroundings. Therefore, associated impacts under the Lower Intensity Alternative would be *similar* to those under the Specific Plan Update.

Currently, the Specific Plan Area contains many existing sources of nighttime illumination. These include street and parking area lights, security lighting, and exterior lighting on existing residential and commercial buildings. Additional onsite light and glare is caused by surrounding land uses and traffic on El Camino Real, Millbrae Avenue and Highway 101. Future development under the Lower Intensity Alternative would be subject to the City's Design Review Process per General Plan Policy LU2.1, which requires quality site planning, architecture and landscape design for all new development, renovation or remodeling. The Design Review Process would include compliance with the Design Guidelines set forth in the currently-adopted 1998 Specific Plan Update. Furthermore, the City has adopted the California Building Code per Municipal Code Section 9.05.010, which includes standards for outdoor lighting that are intended to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls. Overall, interior and exterior lighting provided by the Lower Intensity Alternative would be consistent with the urbanized context of the Specific Plan Area and would not be considered substantial. Accordingly, future development under the Lower Intensity Alternative would not create substantial light and glare such that could degrade daytime or nighttime views, or pose a hazard to drivers on nearby roadways. Therefore, associated impacts under the Lower Intensity Alternative would be *similar* to those under the Specific Plan Update.

In summary, Chapter 4.1 finds that potential impacts from future development under the Specific Plan Update would be avoided through consistency with General Plan policies and Zoning Ordinance performance standards that would also apply to new development under the Lower Intensity Alternative. Under both scenarios, future projects would be subject to the City's Design Review process. In addition, development in the Specific Plan Area under the Lower Intensity Alternative would be required to comply with the 1998 Specific Plan. Therefore, potential aesthetics impacts under the Lower Intensity Alternative would be *similar* to the Specific Plan Update.

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Air Quality

As described in Chapter 4.2, Air Quality, the proposed Specific Plan Update would result in four significant and unavoidable impacts, and one significant impact that would be mitigated to a less-than-significant level with the implementation of Mitigation Measure AQ-SP-4.2 (operational health risk assessment).

Specifically, development allowed by the proposed Specific Plan Update would generate a substantial increase in criteria air pollutant emissions that exceeds the Bay Area Air Quality Management District (BAAQMD) regional significance thresholds. Operational criteria air pollutant emissions would be generated from on-site area sources (e.g. landscaping fuel and consumer products), vehicle trips generated by implementation of the proposed Specific Plan Update, and energy use (e.g. natural gas used for cooking and heating). Fugitive dust particulate matter levels downwind of actively disturbed areas during construction activities could violate air quality standards or contribute substantially to an existing or projected air quality violation and expose sensitive receptors to elevated concentrations of pollutants. Impacts, including cumulative impacts, associated with these effects would be significant and unavoidable. In addition, future projects that would place sensitive receptors within 1,000 feet of major sources of toxic air contaminants (TACs) would need to ensure that they could achieve BAAQMD's performance standards through the implementation of Mitigation Measures AQ-SP-4.1 (construction health risk assessment) and AQ-SP-4.2 (operational health risk assessment).

The Lower Intensity Alternative would allow less office, retail and residential, but the same amount of hotel redevelopment in the Specific Plan Area under the City's existing 1998 Specific Plan and Zoning Ordinance. Under the Lower Intensity Alternative, the reduced office, retail and residential development would reduce impacts associated with the construction and operation of these land uses. Additionally, Mitigation Measures AQ-SP-2.1a through AQ-SP-2.1c that would reduce air quality impacts would also apply to the development under the Lower Intensity Alternative. However, reducing office, retail and residential near the Millbrae Station could lessen the potential benefit gained from siting these land uses near public transit and result in a higher percentage of transit users that may rely on automobiles (as opposed to walking or biking) to and from the Specific Plan Area. Therefore, as a result of reducing development, the Lower Intensity Alternative would not necessarily reduce trips, which are the major source of criteria air pollutants from the Specific Plan Update. However, because the No Project Alternative would result in less overall development than the proposed Specific Plan Update, air quality impacts would from the operation of these uses would be *less*.

Same as the proposed Specific Plan Update, the Lower Intensity Alternative is not the type of project that would result in significant impacts from odor and impacts would be *similar* under both scenarios.

Overall, because the Lower Intensity Alternative would result in less development, consequently, air quality impacts under the Lower Intensity Alternative would be *less* than those under the Specific Plan Update.

Biological Resources

As discussed in Chapter 4.3, Biological Resources, the Specific Plan Area is built out and urbanized, which greatly limits the likelihood of continued occurrence of most special-status plant and animal species. However, redevelopment allowed under the Specific Plan Update and the Lower Intensity Alternative would have the potential to adversely affect pallid bats, a special-status species that roosts in crevices and abandoned buildings, as

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well as one or more species of birds protected under the Migratory Bird Treaty Act and State Fish and Game Code. This impact would be mitigated to a less-than-significant level through the implementation of Mitigation Measures BIO-SP-1.1 and BIO-SP-1.2, which would also apply to future development under the Lower Intensity Alternative. While development would be less intensive under this Alternative, the same area would be impacted; therefore, impacts to special-status species would be similar under both scenarios.

As described in Chapter 4.3, there are no riparian corridors; sensitive natural communities; or established wildlife corridors within or adjoining the Specific Plan Area. In addition, there are no riparian resources or sensitive natural communities within the Specific Plan Area. Therefore, no direct impact to these resources would occur under either scenario.

In summary, due to lack of biological resources under the existing conditions in the Specific Plan Area and because both the Lower Intensity Alternative and the Specific Plan Update would occur in the same area, impacts to biological resources under the Lower Intensity Alternative would be *similar* when compared to the Specific Plan Update

Cultural Resources

Chapter 4.4, Cultural Resources, finds that the Specific Plan Update would result in three significant impacts, as future redevelopment allowed by the Specific Plan Update would have the potential to adversely affect historic buildings and structures or uncover unknown paleontological or archaeological resources. These impacts would be mitigated to less-than-significant levels through the implementation of Mitigation Measures CULT-SP-1 through CULT-SP-3. Redevelopment under the Lower Intensity Alternative would also involve infill development that could affect historic structures or unknown paleontological or archeological resources. As under the Specific Plan Update, these potential impacts could be mitigated to less-than-significant levels.

Chapter 4.4 finds that applicable regulations, procedures, and policies would ensure that any human remains discovered during construction allowed by the Specific Plan Update would be handled appropriately. These regulations, procedures, and policies would also apply to future development under the Lower Intensity Alternative.

In summary, because both the Lower Intensity Alternative and the Specific Plan Update would occur in the same area, the proposed Specific Plan Update and the Lower Intensity Alternative would result in *similar* impacts to cultural resources.

Geology, Soils, and Seismicity

Chapter 4.5, Geology and Soils, finds that development allowed by the Specific Plan Update would result in significant-but-mitigable geology and soils impacts due to low risks for geologic hazards in the Specific Plan Area, coupled with existing applicable policies and building standards. There are no active faults within or adjacent to the Specific Plan Area, the potential for ground rupture, liquefaction, and unstable geologic units is considered low, and the generally flat terrain of the Specific Plan Area would limit landslide and erosion risks. New development would be subject to the California Building Code and the risk reduction policies in the City's General Plan that would address and prevent hazards associated with geology, soils, and seismicity. Implementation of Mitigation

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Measures GEO-SP-1 would require future development under the Specific Plan Update to prepare and comply with site-specific geotechnical investigations.

In summary, the existing conditions would be the same under both scenarios and the City's building standards and policies would also apply to new development allowed under the Lower Intensity Alternative. Therefore, the impacts related to geology and soils under the Lower Intensity Alternative would be *similar* to those under the Specific Plan Update.

Greenhouse Gas Emissions

As described in Chapter 4.6 of this Draft EIR, the proposed Specific Plan Update would result in less-than-significant GHG emissions impacts.

The Lower Intensity Alternative would result in less office, retail and residential, but more hotel redevelopment in the Specific Plan Area. Under the Lower Intensity Alternative, the reduced office, retail and residential development would reduce GHG emissions associated with the construction and operation of these uses. However, as described under the Air Quality discussion above, reducing these land uses near the Millbrae Station would not necessarily reduce automobile trips as the net benefit in reducing vehicle trips by siting these land use near public transit would be lessened. Therefore, the Lower Intensity Alternative would not necessarily reduce GHG emissions from automobile trips in the Specific Plan Update.

In summary, because the Lower Intensity Alternative proposes less development, than the Specific Plan Update, GHG emissions impacts under the Lower Intensity Alternative would be *less* when compared to the Specific Plan Update.

Hazards and Hazardous Materials

Chapter 4.7, Hazards and Hazardous Materials, finds that the Specific Plan Update would result in less-than-significant hazards and hazardous materials impacts with implementation of Mitigation Measure HAZ-SP-4a through HAZ-SP-4b.

Development under the Lower Intensity Alternative would result in office, retail, residential and hotel development, and like the proposed Specific Plan Update would include construction activities that could involve the routine transport, use, and disposal of hazardous materials, and new development could involve the handling, use, and storage of hazardous materials. As described in Chapter 4.7, the Specific Plan Area contains LUST sites, permitted USTs, and multiple sites reporting to the US EPA that are listed in the US EPA's EnviroMapper database. Existing regulations, procedures, and policies and implementation of Mitigation Measure HAZ-SP-4a through HAZ-SP-4b would ensure that impacts are less than significant and that the potential accidental release of hazardous materials is prevented and handled appropriately. These existing regulations, procedures, and policies would be maintained under the Lower Intensity Alternative and the same mitigation measures would be required under both scenarios; thus, impacts would be *similar*.

The Specific Plan Area is within areas of the SFO ALUCP that limit land use and building height to minimize impacts to people residing or working in the Specific Plan Area. Future development under both the Specific Plan

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Update and the Lower Intensity Alternative would be required to be consistent with ALUCP's Policy AP-3, which establishes the procedures for determining the maximum compatible building height. Future development under the Specific Plan Update and the Lower Intensity Alternative would occur within SFO Safety Compatibility Zone 1, Zone 2, and Zone 3, as shown in Figure 4.7-1, and future development under the Lower Intensity Alternative would be required to be compatible with each Zone's applicable land use criteria. Because the types of development under both the Specific Plan Update and the Lower Intensity Alternative would be the same, neither development scenario would subject people or structures to substantial airport related hazards.

As discussed in Chapter 4.7, Hazards and Hazardous Materials, the City has adopted ABAG's multi-jurisdictional Local Hazard Mitigation Plan for the San Francisco Bay Area, as modified for the City's Local Hazard Mitigation. Compliance with the provisions of the California Fire Code and the California Building Code would ensure that buildout of the Lower Intensity Alternative would result in similar impacts to the Specific Plan Update with respect to interference with an adopted emergency response plan or emergency evacuation plan.

In summary, the existing conditions would be the same under both scenarios and the federal, State and local regulatory standards would also apply to new development allowed under the Lower Intensity Alternative. Therefore, the hazards and hazardous materials impacts under the Lower Intensity Alternative would be *similar* to those under the Specific Plan Update.

Hydrology and Water Quality

Chapter 4.8, Hydrology and Water Quality, finds that the Specific Plan Update would result in less-than-significant hydrological impacts. Compliance with existing State and local regulations and procedures would ensure that pre- and post-construction impacts to water quality would be less than significant. These regulations and procedures would be maintained under the Lower Intensity Alternative.

The Specific Plan Area is urbanized, and development under either the Specific Plan Update or Lower Intensity Alternative would not rely on groundwater supplies or interfere with existing groundwater recharge.

The Specific Plan Area does not contain a stream, river, or other drainage facility, apart from the city's storm drain system. Development allowed by either the Specific Plan Update or the Lower Intensity Alternative would connect to the City's storm drain system and would not substantially change existing drainage patterns.

The Specific Plan Area is already built out with impervious surface and the proposed development should not significantly increase the amount of runoff from the site, especially with the requirement to implement C.3 stormwater control provisions. Under the Specific Plan Update, some existing storm drain culverts will be relocated and new interior storm drain collector systems would be required. Since the Specific Plan Area is almost completely built out, the drainage areas and runoff coefficients under both the Specific Plan Update and Lower Intensity Alternative would remain similar to existing conditions.

No portions of the Specific Plan Area are within a flood zone. Therefore, housing and other structures allowed by either the Specific Plan Update or the Lower Intensity Alternative would not be constructed within a 100-year floodplain.

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There are no mapped dam inundation areas within the city or within the Specific Plan Area. In addition, the Specific Plan Area is not within the mapped tsunami inundation area. Therefore, it will not be subject to flooding from a tsunami. There are no nearby reservoirs or aboveground storage tanks that could result in a seiche impacting the Specific Plan Area, and if a seiche were to occur in San Francisco Bay, it would not impact the Specific Plan Area, because the impact would not extend beyond the tsunami inundation zone.

In summary, impacts under the Specific Plan Update and the Lower Intensity Alternative would be *similar*.

Land Use and Planning

As discussed in Chapter 4.9, Land Use and Planning, the Specific Plan Update would result in no land use and planning impacts. The Specific Plan Update would aim to improve connectivity and would not create physical barriers within existing communities. Similarly, the Lower Intensity Alternative supports the integration of the infill development and does not propose physical features that could divide a community.

Similar to the No Project Alternative under the Land Use and Planning discussion above, the Specific Plan Area is with the *Plan Bay Area* PDA, which encourages transit-oriented and infill development is encouraged. The Specific Plan Update is consistent with the goals of *Plan Bay Area* by focusing on mixed-use and TOD, providing better connectivity between the Specific Plan Area and adjacent land uses, and providing mixed-use development near the Millbrae Station. New development allowed under the Lower Intensity Alternative would also redevelop the Specific Plan Area with transit-supportive uses; however, the reduced development under the Lower Intensity Alternative would not provide the same intensive development and therefore, would not be consistent with these goals.

The Specific Plan Area is within the Safety Compatibility Zones 2 and 3 of the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (SFO ALCUP). Like the proposed Specific Plan Update project, the land uses under this alternative would be consistent with the SFO ALCUP.

BART's TOD Policy seeks to promote high quality, more intensive development on and near BART stations. The Specific Plan Update is consistent with the TOD Policy because it would locate new housing, retail space, office space, and hotel rooms in close proximity, and in some cases immediately adjacent to the Millbrae Station, and because many of its future residents and employees would be expected to ride BART and/or Caltrain for commute or recreational trips instead of driving. Similarly, the Lower Intensity Alternative would locate new office, retail, residential and hotel uses in the Specific Plan Area. It is expected that future users of these land uses would also use BART and/or Caltrain for many trips, as under the Specific Plan Update; however, the less intensive development without as much residential development under the Lower Intensity Alternative would be less consistent with these policies.

In summary, the Lower Intensity Alternative reduced level of development would not be as consistent with the goals and policies of *Plan Bay Area* or the BART TOD policies that support more "intensive" development on and near transit stations. Therefore, the land use consistency impacts under the Lower Intensity Alternative would be *greater* when compared to those under the Specific Plan Update.

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Noise

Future development under the designations of the Specific Plan Update would be subject to the standards of the Municipal Code, including those relating to the interface between residential and non-residential land uses. As specific uses are proposed for particular sites, project-level design, permitting, and environmental review would serve to ensure that individual uses would comply with the provisions of the City's General Plan and Municipal Code. Additionally, by including appropriate buffers, berms, barriers, or other site design features, development of uses under the Specific Plan Update would comply with the applicable General Plan policies and Municipal Code performance standards. The Lower Intensity Alternative would also be subject to these applicable standards.

Compliance with relevant General Plan policies and provisions of the Municipal Code, including those that restrict construction activities to occur during daytime hours, would serve to ensure that noise from construction impacts and stationary noise sources associated with development of new land uses under the Lower Intensity Alternative would not result in significant permanent increases in the ambient noise level in the Specific Plan Area and vicinity.

As previously state, the Specific Plan Area falls within the SFO ALUCP Area. With the exception of the area southwest of El Camino Real, the Specific Plan Area is within at least the 65 dBA CNEL Airport Noise Contour, on the noise contour map in the Millbrae General Plan. The Lower Intensity Alternative would seek to minimize aircraft noise levels to the maximum extent feasible through compliance with the applicable federal, State and General Plan polices and Municipal Code performance standards related to airport noise.

In summary, noise related impacts from future development under the Lower Intensity Alternative would be *similar* to those under the Specific Plan Update.

Population and Housing

As discussed in Chapter 4.11, the Specific Plan Update would not exceed ABAG projections for housing and population in the Transit Station Area PDA, and employment growth in the Specific Plan Area would support the ABAG policies and the City's General Plan Policy LU3.7 regarding a jobs/housing balance. The 304 new residents expected from the Lower Intensity Alternative represent about 3.4 percent of ABAG's population projection for the city by 2040.⁶ Implementation of the Lower Intensity Alternative could generate as many as 912 new housing units upon buildout. Accordingly, implementation of the Lower Intensity Alternative would not exceed ABAG's projection for the Transit Station Area PDA, which will accommodate 2,420 housing units between 2010 and 2040. Overall, the additional housing units and population resulting from implementation of the Lower Intensity Alternative would not exceed regional projections.

ABAG projects an increase of 2,430 jobs in Millbrae by the year 2040.⁷ The Lower Intensity Alternative is expected to result in 7,091 jobs of which 6,424 would be new jobs in Millbrae. These new jobs would exceed the regional job projections by 3,994 jobs. As with the Specific Plan Update, this additional growth under the Lower

⁶ ABAG projects 8,768 new residents in Millbrae between 2010 and 2040. See Table 4.11-2 in Chapter 4.11, Population and Housing, of this Draft EIR.

⁷ ABAG projects 2,430 new jobs in Millbrae between 2010 and 2040. See Table 4.11-2 in Chapter 4.11, Population and Housing, of this Draft EIR.

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Intensity Alternative would be consistent with the regional planning objectives established for the Bay Area, and would come incrementally over a period of approximately 25 years. Furthermore, a policy framework is in place to ensure adequate planning occurs to accommodate this Alternative. Therefore, impacts under the Lower Intensity Alternative would be *similar* to those under the Specific Plan Update.

The Lower Intensity Alternative would allow a net increase of residential, retail space, office space, and hotel uses in the Specific Plan Area. The Specific Plan Area has one housing unit on the TOD #1 project site that would be redeveloped to a mixed-use complex under the Lower Intensity Alternative. Since implementation of the Lower Intensity Alternative would result in a net increase in housing, it would not require replacement housing outside the Specific Plan Area in the event that the housing unit is displaced. Therefore, impacts under the Lower Intensity Alternative would be similar to those under the Specific Plan Update.

In summary, while the Lower Intensity Alternative would result in a different buildout potential, impacts related to population and housing would be *similar* when compared to the Specific Plan Update.

Public Services and Recreation

Fire and Police Services

As discussed in Chapter 4.12, the Specific Plan Update's potential impacts associated with expansion of CCFD facilities would be less than significant. In addition, the Specific Plan Update would not require additional MPB or BART Police Department staffing or facilities. The Lower Intensity Alternative would generate fewer new residents and workers in the Specific Plan Area than the Specific Plan Update, and therefore, would result in fewer demands on the CCFD and the MPB or BART Police Department.

Schools

Buildout of the Lower Intensity Alternative would result in 423 residential units.

Applying MESD student generation rates of 0.4 students per household for grades kindergarten through 6th grade (K-6th), and 0.1 students per household for 7th and 8th grade, this alternative would be expected to generate approximately 170 students in K-6th grade and 43 new students in 7th and 8th grade, compared to 700 K-6th grade students and 175 7th and 8th grade students⁸ under the Specific Plan Update, in the MESD. Applying a student generation rate of 0.2 students per unit, this alternative would generate approximately 85 high school students, compared to 350 students⁹ under the Specific Plan Update.

Buildout of the Lower Intensity Alternative would occur over the course of 25 years, and like the proposed Specific Plan Update, would result in a gradual increase in demand for school services. Furthermore, as some of the proposed residential units would be studio and one-bedroom units accommodating single residents and couples without children, it is likely that the student generation estimates are high; thereby, allowing for a conservative analysis of potential impacts to schools.

⁸ 1,750 units x 0.4 grades K-6th students per unit = 700 students. 1,750 units x 0.1 7th to 8th grade students = 175 students.

⁹ 1,750 units x 0.2 high school students per unit = 350 students

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Like development under the proposed Specific Plan Update, development under the Lower Intensity Alternative would be subject to development impact fees in accordance with the provisions of SB 50, as well as parcel taxes. The payment of development impact fees is deemed to fully mitigate the impacts of new development on school facilities, per California Government Code Section 65995.

In summary, while future development under each scenario would be required to pay development impact fees to fully mitigate impacts to schools, the Lower Intensity Alternative would generate less residential growth and subsequently fewer students, and impacts would be *less* when compared to the proposed Specific Plan Update.

Libraries

The Specific Plan Update would not require the physical expansion of library facilities. The Lower Intensity Alternative would generate fewer new residents; thus, fewer primary users of the library, e.g. families with children, would result in the Specific Plan Area than the Specific Plan Update, and therefore, would place fewer demands on SMCL facilities or resources.

Parks and Recreation

In addition, the Specific Plan Update would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered parks; would not result in substantial physical deterioration of existing neighborhood and regional parks or other recreational facilities; and would not include or require the construction or expansion of recreational facilities. The Lower Intensity Alternative would generate fewer residents; thus, fewer primary users of the parks, e.g. families with children, in the Specific Plan Area than the Specific Plan Update, and therefore, would place fewer demands on city parks or recreational facilities.

In summary, the Lower Intensity Alternative would place fewer demands on the public service providers to Millbrae; therefore, impacts under the Lower Intensity Alternative would be *less* when compared to the Specific Plan Update.

Transportation and Circulation

As discussed in Chapter 4.13, Transportation and Circulation, of this Draft EIR, the proposed Specific Plan Update would result in significant impacts at four intersections based on the City's intersection operations impact significance criteria. Even with implementation of mitigation measures, all but one would remain significant and unavoidable. In addition, the proposed Specific Plan Update would result in a significant and unavoidable impact because it would add traffic to freeway segments that operate below the Caltrans standard.

Under the Lower Intensity Alternative, less office, retail, residential and the same amount of hotel development would occur. The reduced office, retail and residential development would reduce trips and related congestion, but the same amount of trips from hotel uses would occur. As discussed under Air Quality and GHG Emissions above, reducing these types of land uses in close proximity to the Millbrae Station could increase automobile trips to and from the Specific Plan Area, which could be offset by increasing the amount of development in the Specific Plan Area under the Specific Plan Update, thus reducing trips from residents in the Specific Plan Area that could work in the Specific Plan Area or walk to the Millbrae Station rather than drive. Therefore, the Lower Intensity Alternative would not necessarily reduce the significant intersection or freeway segment impacts.

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Chapter 4.13 finds that the proposed Specific Plan Update would not conflict with adopted transportation policies, plans, or programs regarding public transit and bicycle and pedestrian facilities. The proposed Specific Plan Update contains policies supporting transit that are consistent with those in the General Plan; it also includes infrastructure improvements that encourage and anticipate increased transit use. Similarly, the Specific Plan Update proposes substantial improvements to pedestrian and bicycle infrastructure. The Lower Intensity Alternative would have *similar* impacts.

Although the Specific Plan Update would increase parking demand, Chapter 4.13 finds the proposed Specific Plan Update would provide adequate parking. The Lower Intensity Alternative, like the Specific Plan Update includes updated bicycle parking rates based on a sample of best practices conducted by APBP and BART's 2002 *Bicycle Access and Parking Plan*, which is more representative of bicycle parking needs under current conditions than the City's existing Municipal Code. Nonetheless, the Lower Intensity Alternative would allow less development overall, which would reduce parking demands; therefore, impacts would be *similar* under both scenarios.

Finally, through the City's comprehensive development review process and compliance with City Codes, the proposed Specific Plan Update would avoid impacts related to inadequate emergency access and hazards, and it would not result in a change in air traffic patterns. Development allowed under the Lower Intensity Alternative would be subject to the same development review process and City Codes, and it would impact regional air travel at a reduced scale, so emergency access, and air traffic pattern impacts would be less than the Specific Plan Update. Under the proposed Specific Plan Update queuing hazards would occur due to traffic back-ups at two intersections; however, these intersections currently exceed available storage space. Accordingly, additional traffic from the Lower Intensity Alternative would also exacerbate this existing condition.

Overall, the Lower Intensity Alternative would have *less* transportation and circulation impacts when compared to the proposed Specific Plan Update. .

Utilities and Service Systems

Water

A Water Supply Assessment was prepared for the Specific Plan Update to determine the increase in water demand and assess the available water supply's ability to meet the demands of the proposed Specific Plan Update for normal, single dry, and multiple dry years. As discussed in Chapter 4.14, Utilities and Service Systems, with implementation of the proposed Specific Plan Update Plan there would not be sufficient water supplies available to serve the proposed Project from existing entitlements and resources during dry years.

As discussed in Chapter 4.14, Millbrae adopted its 2010 Urban Water Management Plan (UWMP) on June 14, 2011, by Resolution No. 11-17.¹⁰ The UWMP is a long-range planning document used to assess current and projected water usage, water supply planning and conservation and recycling efforts. The UWMP includes a Water Shortage Contingency Plan, described in Section 8 of the UWMP. Using the measures in the Water Shortage Contingency Plan to reduce the demands to the required supply availability, the UWMP estimates that Millbrae will have

¹⁰ Consistent with the Urban Water Management Act, the UWMP must be updated every five years; accordingly, the City is in the process of updating their 2010 UWMP.

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adequate supplies to meet demands during normal, single-dry, and multiple-dry years throughout the 25-year planning period of the UWMP (i.e. through 2035).

Improvements to the existing water distribution would be required to meet the future demands in the Specific Plan Area under the proposed Specific Plan Update. Chapter 4.14, Utilities and Service Systems, finds that impacts associated with these improvements would be less than significant. Under the Lower Intensity Alternative, like the proposed Specific Plan Update, future development would be required to comply with mandatory regulations as described in Chapter 4.14 and impacts would be *similar*.

In summary, impacts to water supply under the No Project Alternative would be *less* than those under the Specific Plan Update due to the reduce development potential.

Wastewater

As discussed in Chapter 4.14, improvements to the existing wastewater treatment would not be required in order to meet the future demands in the Specific Plan Area under the Specific Plan Update; however, collection system infrastructure improvements will be required by applicants/developers of new projects with substantial sewer generation. Regardless, impacts associated with these improvements would be less than significant. The Lower Intensity Alternative would involve less development than the Specific Plan Update, and therefore, would result in less wastewater infrastructure needs. Improvements would still be needed to serve new development, but may be *less* extensive.

Solid Waste

Solid waste from the Specific Plan Update would be less than two percent of the daily capacity (i.e. 3,598 tons/day) of the Ox Mountain Landfill, which receives 99 percent of Millbrae's solid waste. The solid waste generated from buildout of the Specific Plan Update is also less than three percent of the permitted daily capacity of the Recology Landfill, which has the smallest daily capacity (i.e. 2,400 tons/day) of any of the three landfills (along with Monterey Peninsula Landfill and Potrero Hills Landfill) that receive the remaining one percent of Millbrae's solid waste. In addition, compliance with the applicable regulations listed under UTIL-5 in Chapter 4.14 would ensure less-than-significant impacts associated with solid waste. Because the Lower Intensity Alternative would result in less growth than the Specific Plan Update, it would generate *less* solid waste and impacts would be reduced from those of the Specific Plan Update.

Energy Conservation

Even with energy saving practices in place, new electrical connections, switches and/or transformers might be required to serve new structures and/or carry additional loads within the Specific Plan Area under the Lower Intensity Alternative. Similarly, new gas distribution lines and connections may be necessary. However, due to the Specific Plan Area's size and location within an urban development, buildout of the Lower Intensity Alternative would not significantly increase energy demands within the service territory and would not require new energy supply facilities. Transportation design features that are priorities of the Specific Plan Update would be implemented under the Lower Intensity Alternative, same as the proposed Specific Plan Update, and ongoing, compliance with the applicable General Plan policies would be required to reduce energy impacts from transportation. New developments would be constructed using energy efficient modern building materials,

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construction practices, appliances and equipment, and would have to comply with the applicable General Plan policies, CALGreen Building Code and the other applicable state and local energy efficiency measures. This would ensure that significant energy conservation and savings would be realized from future development under the Lower Intensity Alternative. Because the Lower Intensity Alternative would result in less growth than the proposed Specific Plan Update, it would use *less* energy.

Overall, energy related impacts under the Lower Intensity Alternative, would be *less* than those under the proposed Specific Plan Update.

Relationship of the Alternative to the Objectives

As previously stated, the primary intent of the proposed Specific Plan Update is to revise the 1998 Specific Plan to facilitate new Class A office, retail, hotel and residential development in proximity to the Millbrae Station to respond to changing market conditions and demographic shifts, while considering other planning goals, such as enhancing pedestrian mobility, bicycle circulation, and transit access. The Lower Intensity Alternative would update the 1998 Specific Plan with the same land use and urban design concepts, overall goals, policies and development standards, and would provide the same general mix of uses as that of the proposed Specific Plan Update, but with more office and less residential; therefore, this Alternative would meet the general intent of the proposed Specific Plan Update. However, the reduced high-density housing would not meet the Project's objective to be consistent with the *Plan Bay Area*, which encourages high density development in close proximity to transit nodes that will help to reduce greenhouse gas emissions through a reduction in vehicle trips.