



401 East Millbrae Avenue Project (Moxy Hotel)

Initial Study – Mitigated Negative Declaration

prepared by
City of Millbrae
Community Development Department
621 Magnolia Avenue
Millbrae, California 94030
Contact: Sam Fielding, Senior Planner

prepared with the assistance of

Rincon Consultants, Inc.
449 15th Street, Suite 303
Oakland, California 94612

June 2020

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Contact: Roscoe Mata, Planning Manager

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Appendix AQ	Air Quality and Greenhouse Gas Emissions Modeling Results
Appendix HAZ	Phase 1 Environmental Site Assessment
Appendix NOI	Noise Assessment
Appendix TRA	Transportation Study and Supplemental Memorandum

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Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
AEP	Association of Environmental Professionals
ALUCP	Airport Land Use Compatibility Plan
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BIOS	Biogeographic Information and Observation System
BMP	best management practice
BTU	British thermal unit
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
CARB	California Air Resources Board
CBC	California Building Code
CCFD	Central County Fire Department
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFGC	California Fish and Game Code
CH ₄	methane
CMP	Congestion Management Program
CNDDDB	California Natural Diversity Data Base
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalents

CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CSSC	California Species of Special Concern
CWA	Clean Water Act
dB	decibels
dBA	A-weighted sound pressure level
DNL	Day-Night Average Level
DOC	California Department of Conservation
DOT	United States Department of Transportation
DTSC	Californian Department of Toxic Substances Control
EDR	Environmental Data Resources, Inc.
EMFAC	Emissions Factors Model
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FINDS	Facility Index System
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
GHG	greenhouse gases
GWh	gigawatt-hours (GWh)
GWP	global warming potential
HFC	hydrofluorocarbons
HVAC	heating, ventilation, and air conditioning
I-280	Interstate 280
IPaC	Information for Planning and Consultation
kWh	kilowatt hour
LOS	level of service
lbs/day	pounds per day
Leq	Equivalent continuous sound level
Lmax	highest value measured by a sound level meter over a given period of time
Lmin	lowest value measured by a sound level meter over a given period of time
LUST	leaking underground storage tank

MTC	Metropolitan Transportation Commission
MGD	million gallons per day
MLD	most likely descendent
µg/m ³	micrograms per cubic meter
MMBtu	million BTU
MMC	Millbrae Municipal Code
MMthm	million U.S. therms
MPB	Millbrae Police Bureau
MT	metric tons
N ₂ O	nitrous oxide
NMFS	National Marine Fisheries Service
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetlands Inventory
PFCs	perfluorocarbons
PG&E	Pacific Gas and Electric Company
PM ₁₀	suspended particulate matter (10 microns or smaller)
PM _{2.5}	suspended particulate matter (2.5 microns or smaller)
PPM	parts per million
RCNM	Roadway Construction Noise Model
REC	Recognized Environmental Condition
ROG	reactive organic gases
RTP	Regional Transportation Plans
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCS	Sustainable Communities' Strategies
SIP	State Implementation Plan
SF ₆	sulfur hexafluoride
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SMCWPPP	San Mateo Countywide Water Pollution Prevention Program
TAC	toxic air contaminants
UCMP	University of California Museum of Paleontology
U.S. EPA	United States Environmental Protection Agency

USGS	United States Geological Society
UST	underground storage tank
UWMP	Urban Water Management Plan
VdB	vibration decibels
VMT	vehicle miles travelled
VOC	volatile organic compounds
WDR	Waste Discharge Requirement
WPCP	Water Pollution Control Plant
WSCP	Water Shortage Contingency Plan

Initial Study

1. Project Title

401 East Millbrae Avenue (Moxy Hotel) Project

2. Lead Agency Name and Address

City of Millbrae
Community Development Department
621 Magnolia Avenue
Millbrae, California 94030

3. Contact Person and Phone Number

Sam Fielding, Senior Planner 650-259-2336

4. Project Location

The project site encompasses two parcels, 401 East Millbrae Avenue and 1 Old Bayshore Highway (Assessor's Parcel Numbers 024-701-10 and 024-370-150, respectively) at the southeastern edge of the City of Millbrae. Two existing hotels, the Aloft Hotel and the Westin Hotel, are located on the subject parcels. The site is bounded by Old Bayshore Highway to the north, Millbrae Avenue to the west, U.S. Highway 101 (Bayshore Freeway) to the south, and El Portal Canal to the east. Figure 1 shows the regional location and Figure 2 shows an aerial view of the project site and immediate surroundings. Figure 3 and Figure 4 are site photographs that show existing conditions at the proposed location of the new hotel.

5. Project Sponsor's Name and Address

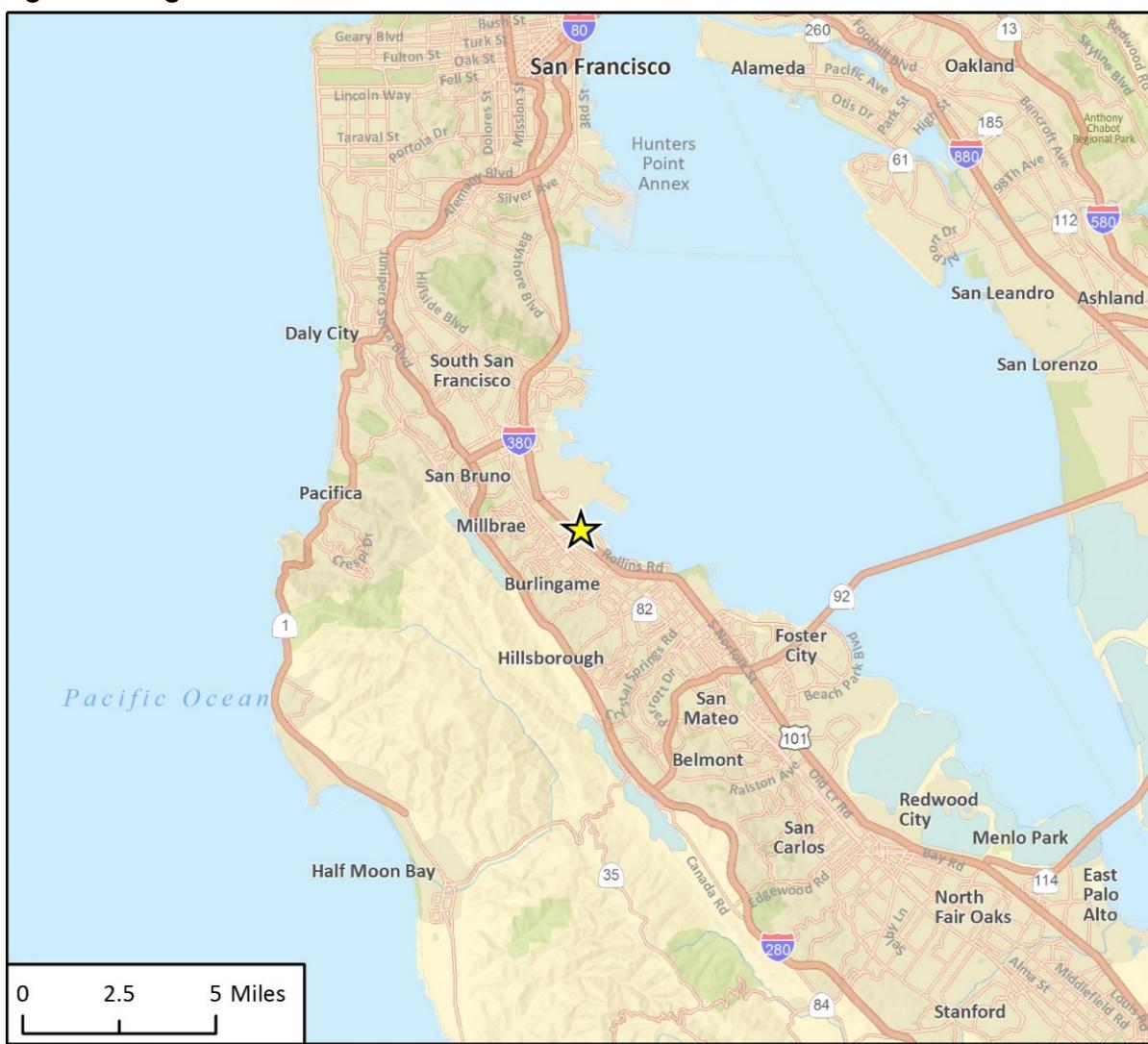
Starwood Capital Group
100 Pine Street, Suite 3000
San Francisco, California 94111

6. General Plan Designation

According to the 1998 Millbrae General Plan, the project site is in the General Commercial Land Use Designation, which "includes the full range of retail commercial uses including apparel and accessory stores, food stores, banks, personal and professional services, hospitals, offices, furniture stores, restaurants, wholesale-retail trade, and auto related uses. Apartments and outdoor sales are allowed as Conditional Uses."

City of Millbrae
401 East Millbrae Avenue Project (Moxy Hotel)

Figure 1 Regional Location



Imagery provided by Esri and its licensors © 2019.

Project Location

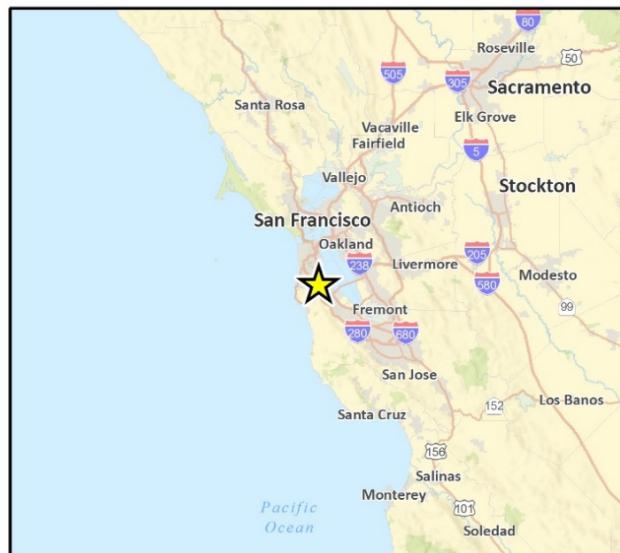
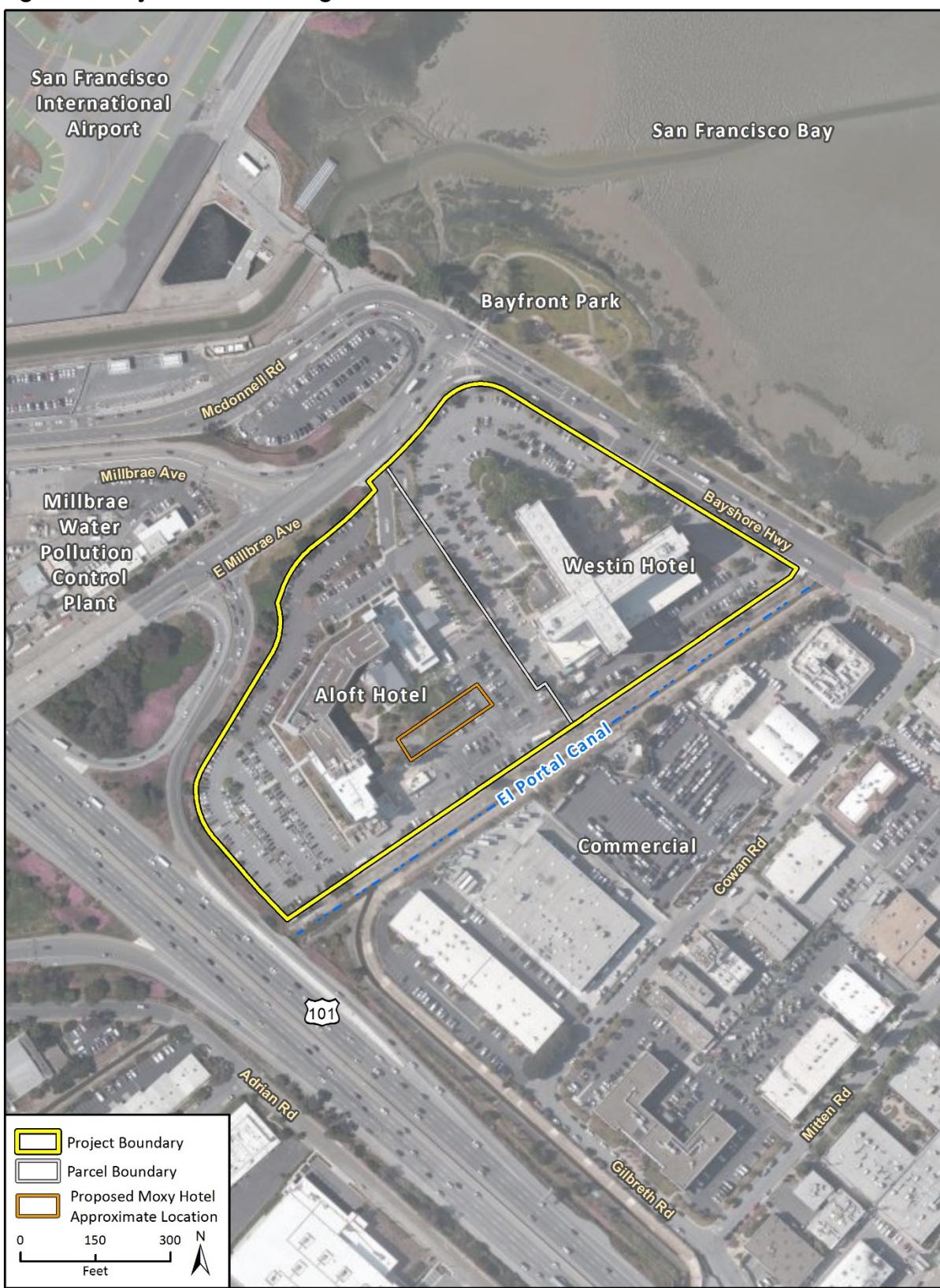


Fig 1 Regional Location

Figure 2 Project Site in its Neighborhood Context

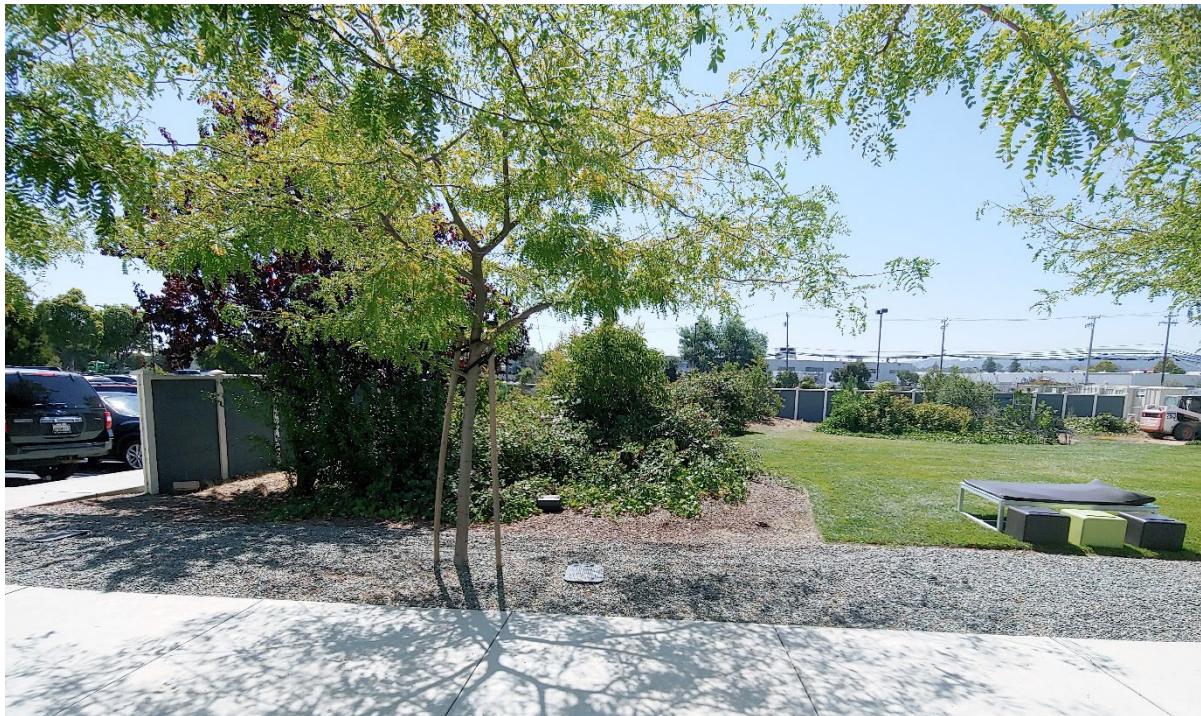
Imagery provided by Microsoft Bing and its licensors © 2019.

Figure 3 Existing Conditions, Looking Southeast



View of the location of the proposed hotel, looking southeast towards the existing parking lot and Westin Hotel.

Figure 4 Existing Conditions, Looking South



View of the location of the proposed hotel, looking south towards existing parking lot and courtyard of the Aloft Hotel.

7. Zoning

The project site is in the Planned Development (PD) zoning district. According to the Millbrae Municipal Code, the purpose of the PD district is “to grant diversification in the location of structures and other site qualities while ensuring adequate standards relating to public health, safety, welfare, comfort and convenience” (Section 10.05.1500). Further, “any use consistent with the Millbrae General Plan may be permitted provided such use has been designated in a conceptual development plan” (Section 10.05.1510). The previous Specific Development Plan and Design Review approvals by Millbrae Planning Commission on December 13, 2010, envisioned and conceptually approved construction of a third, 6-story, 158-room hotel at the site. Thus, the proposed development of a hotel would be consistent with allowed uses in the PD zoning district, as well as prior conceptual approvals granted for the site.

8. Surrounding Land Uses and Setting

The project site is in an area of the City of Millbrae that is characterized by a mix of commercial, institutional, and industrial uses. The two-story Millbrae Water Pollution Control Plant is located north of the site, across Millbrae Avenue. The San Francisco International Airport (SFO) and associated runways and parking lots are located further north, approximately 600 feet from the project site. Bayfront park and the San Francisco Bay are east of the project site, across Old Bayshore Highway. El Portal Canal, a fully channelized stormwater conveyance that drains into the San Francisco Bay, runs along the southern boundary of the project site. Commercial uses including restaurants, public storage companies, and car rental companies are located south of the site, across the El Portal Canal, and west of the project site, across Highway 101.

As noted above, the project site is currently developed with two hotels. The six-story Aloft Hotel is on the western portion of the site, and the seven-story Westin Hotel is on the eastern portion of the site. A surface parking lot with 893 parking spaces surrounds the existing hotels. The site also includes existing landscaped areas at the ground-level courtyards and open spaces that surround the existing hotels. The proposed hotel would be constructed between the two existing hotels with six and seven stories on a space currently occupied by landscaping and a portion of the parking lots for the existing hotels. The southern end of the new building would be 45 feet from the existing Aloft Hotel, and its northern end would be 113 feet from the existing Westin Hotel. Figure 5 shows the location of the proposed hotel at the project site.

9. Project Description

The proposed project would involve development of a 209-room, six-story hotel. The footprint of the hotel would be rectangular, with a length of approximately 192 feet that would run parallel with the eastern edge of the site, and a width of approximately 43 feet. The main entrance to the hotel would be at the northern façade of the building. The ground floor would include a welcome lobby for hotel guests, a café and bar space, a lounge and library, a fitness room, mechanical areas and elevators, and a kitchen. The floors above the ground floor would be organized according to the same general floor plan. Each floor would include approximately 40 guest rooms, arranged around a central hallway. The elevators and other service areas would be located towards the middle of each floor plan. Average single rooms would be 208 square feet, and average suites would be 439 square feet. A 745 square-foot landscaped roof deck would be available for hotel guests.

The exterior of the building would be contemporary, with modular forms that protrude at varying angles. Figure 6 shows a rendering of the proposed east façade. Parking for the hotel would be available at the existing parking lot. The proposed project would result in a net loss of seventeen parking spaces at the project site. With the addition of the proposed hotel, a total of 928 hotel rooms in three hotels and 876 parking spaces would be provided. The existing three parcels that are improved with the existing 6- and 7-story hotels would be adjusted so that the proposed project would be located on a separate parcel.

The project would also involve the modification of an existing free standing, double-sided sign at the southern edge of the project site, along Highway 101. The existing sign, shown in Figure 7, is associated with the Aloft hotel and is 55 feet tall and 20 feet wide. Under the proposed project, a digital billboard measuring 14 feet tall by 48 feet wide would be added in its place. The overall height of the sign would be maintained at 55 feet. Figure 8 shows a rendering of the proposed modified sign.

Table 1 provides a project summary.

Table 1 Project Summary

Proposed Room Breakdown	
Single	207 rooms
Suite	2 rooms
Total	209 rooms
Proposed Open Space	
Ground	8,835 square feet
Roof Deck	745 square feet
Total	9,580 square feet
Building Dimensions	
Height	72 feet 3 inches (average roof height)
Floor Area	76,443 square feet

Figure 5 Proposed Site Plan

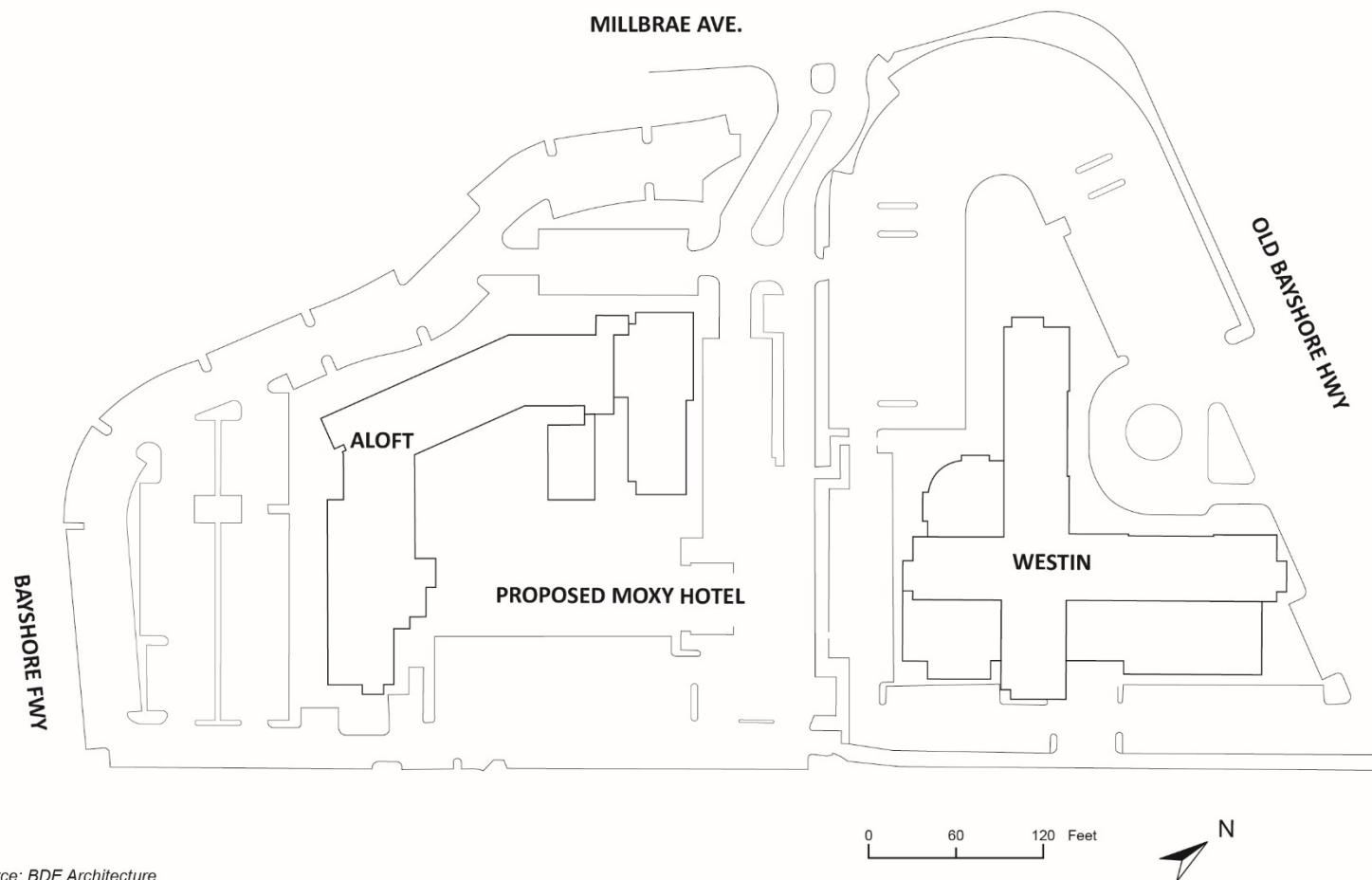


Figure 6 Proposed Rendering, Looking Towards the South Elevation



Source: BDE Architecture

Figure 7 Existing Aloft Hotel Signage, Looking Northwest



Figure 8 Rendering of Proposed Signage Modification, Looking South



10. Construction

Project construction would occur over approximately 16 months, beginning in Fall 2020. Construction equipment would include standard heavy construction machinery for earth moving during demolition and excavation. To complete the construction of the project, an estimated 657 cubic yards of soil would be exported. The maximum depth of excavation proposed is estimated to be approximately five feet below ground surface. The project is projected to be operational by late 2021.

11. Required Approvals

The proposed project would require the City of Millbrae's discretionary approval of a modification to an approved Specific Development Plan, Design Review, Master Sign Program and Parking Variance at the project site. In addition, the project would require an amendment to the Municipal Code to allow a general advertising billboard on private property. Finally, the sign would also require approval of a permit through Caltrans and Federal Aviation Administration (FAA).

12. Other Public Agencies Whose Approval is Required

The City of Millbrae is the lead agency with responsibility for approving the project. Discretionary approval from other public agencies is not required.

13. California Native American Tribes Traditionally and Culturally Affiliated with the Project Area and that have Requested Consultation Pursuant to Public Resources Code Section 21080.3.1

No California Native American Tribes have requested consultation pursuant to Public Resources Code Section 21080.3.1. As described in Section 18, *Tribal Cultural Resources*, below, the City of Millbrae sent letters in compliance with Assembly Bill (AB) 52 on November 5, 2019. As of January 9, 2020, the City has not received any response from AB 52 letters sent to the California Native American tribes.

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Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is “Potentially Significant” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture and Forestry Resources	<input checked="" type="checkbox"/> Air Quality
<input type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Energy
<input type="checkbox"/> Geology/Soils	<input checked="" type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards & Hazardous Materials
<input type="checkbox"/> Hydrology/Water Quality	<input type="checkbox"/> Land Use/Planning	<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Noise	<input type="checkbox"/> Population/Housing	<input type="checkbox"/> Public Services
<input type="checkbox"/> Recreation	<input type="checkbox"/> Transportation	<input checked="" type="checkbox"/> Tribal Cultural Resources
<input type="checkbox"/> Utilities/Service Systems	<input type="checkbox"/> Wildfire	<input checked="" type="checkbox"/> Mandatory Findings of Significance

Determination

Based on this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “less than significant with mitigation incorporated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

City of Millbrae
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I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

June 18, 2020

Date

Roscoe Mata

Printed Name

Planning Manager

Title

Environmental Checklist

1 Aesthetics

Potentially Significant Impact	Less than Significant with Mitigation Incorporated			Less than Significant Impact	No Impact
	Less than Significant	with Mitigation Incorporated	Less than Significant Impact	No Impact	

Except as provided in Public Resources Code Section 21099, would the project:

- a. Have a substantial adverse effect on a scenic vista?
- b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
- d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

- a. *Would the project have a substantial adverse effect on a scenic vista?*
- b. *Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

The nearest designated California Scenic Highway is California State Route 35, which is approximately two miles west of the project site and connects San Francisco in the north to Portola Valley in the south. Given the distance from this highway and the presence of other structures, the project site cannot be seen from State Route 35. Highway 101, which is adjacent to the project site, is not designated as a California Scenic Highway. In addition, there are no rock outcroppings or historic buildings on the site, and the existing trees are not of a size or species such that they are scenic resources. Therefore, the project would not substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

The Millbrae General Plan has not established official scenic vistas in the city. Scenic vistas are generally interpreted as long-range views of a specific scenic feature, such as open space lands, mountain ridges, or bodies of water. Potential scenic features available from or through the project

site include the Santa Cruz Mountain Range to the west, the San Bruno Mountains to the north, and the San Francisco Bay to the east. However, views of these features are limited by existing development and landscaping present at the project site. Private views looking northeast across the San Francisco Bay are available from the six-story Westin Hotel, and views of the mountains towards the west are available from the seven-story Aloft Hotel. The proposed project would be six stories and constructed in the space between the two existing hotels. Given its proposed design and position between existing structures of similar height, public views of scenic resources would not be substantially obstructed.

The project would also involve the modification of an existing double-sided free-standing sign along Highway 101 at the southern edge of the project site. Figure 7 shows the existing sign. While the new sign face would be larger than the existing sign face (672 square feet instead of 280 square feet), the height, 55 feet, and location of the sign would remain the same. The prior approvals for the existing sign include a 2007 approval for a 640-sf sign and a 2010 approval for 580-sf sign, however, in 2011 the sign was reduced in size to the current size due to the property owner's removal of three out of the four sign displays. Figure 8 shows a rendering of the proposed modifications. Moreover, an existing taller and larger sign is located approximately 200 feet southeast of the proposed sign location, also along the east side of Highway 101. While the proposed sign would be larger than the existing sign, there are not substantial scenic resources present in the vicinity of the sign. Existing trees block views of San Francisco Bay from Highway 101. Therefore, the proposed modification of the existing sign would not significantly impact scenic views. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. *Would the project conflict with applicable zoning and other regulations governing scenic quality?*

The project site is situated in a heavily urbanized area, with commercial, industrial and residential development present in the vicinity. The project site is developed with two six- and seven-story hotels and a surface parking lot. Existing building materials at the site include grey and orange stucco and concrete. Immediately surrounding the project site are Bayfront Park and the San Francisco Bay to the northeast, one-story industrial, institutional, and commercial buildings to the southeast, Highway 101 to the southwest, and SFO to the north.

As described in Section 11, *Land Use and Planning*, the project would require approval by the Planning Commission of a modification to an approved Specific Development Plan, Design Review, Master Sign Program and a Parking Variance. (The proposed sign would also require an amendment to the Municipal Code to allow a general advertising billboard on private property.) The Planning Commission would need to find that "the proposed development conforms to the overall intent of the development plan, and will produce an environment of stable, desirable character and high-quality development with uses that contribute to the environmental quality of the stated area" and represents "a development of sufficient harmony within itself and with adjacent areas to justify any exceptions to the normal regulations within this chapter" (Millbrae Municipal Code (MMC) Section 10.05.1550). Moreover, the project would require design review by the Planning Commission as it would involve a new building. To receive design review approval, the Planning Commission would need to find that "the architectural, landscaping, and general appearance of the proposed building or structure and grounds are in keeping with the character of the neighborhood" and that "the project complies with all applicable development regulations" (MMC Section 10.05.2500). These

required findings would ensure that the new hotel would not degrade the visual character of the site.

The project would also involve the replacement and enlargement of an existing free-standing sign along Highway 101 at the southern edge of the project site. As described in criteria (a) and (b) above, the new sign would not obstruct surrounding views. The new sign would be subject to approval of a modification to the existing Master Sign Program and, because it would be larger than 50 square feet, design review approval by the Planning Commission. Approval of design review for a sign permit can be issued only after determination that the sign is consistent with location, size, scale, lighting, and design requirements of the MMC Sign Regulations (Chapter 10.10). In addition, the Planning Commission must find that the proposed “materials and colors harmonize with their surroundings and are compatible with the architectural style of the building.” This review process and required compliance with objective standards and findings for compatibility would ensure that the new sign would be consistent with applicable zoning regulations and not degrade the visual quality of the site. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

The project site is in an urbanized area with relatively high levels of existing lighting. Adjacent uses generate light and glare along all sides of the property. Primary sources of light adjacent to the project site are lighting associated with the existing commercial and industrial buildings, including building-mounted and perimeter lighting, as well as interior lighting visible through windows; streetlights; and headlights from vehicles on nearby streets and Highway 101. Sources of light on the project site include interior lighting visible through windows, headlights from vehicles, and exterior building lights to illuminate signage, parking areas and walkways. The primary source of glare adjacent to the project site is the sun’s reflection from metallic and glass surfaces on buildings and on vehicles parked on adjacent streets and in adjacent parking areas. Vehicles parked on the project site are the primary source of daytime glare on the project site.

The proposed project would incorporate exterior lighting in the form of pedestrian walkway lighting and other safety-related lighting. Additionally, interior lighting would be visible through the proposed building’s windows. However, there are no light-sensitive uses in the immediate vicinity and new sources of light associated with the project would not have a significant impact on the night sky, as they would only incrementally contribute to the existing light and glare levels present. Therefore, in its context the project would not create a new source of substantial light or glare.

The proposed sign would be a digital billboard and would add a source of light and glare. However, the following requirements in MMC Chapter 10.10, Sign Regulations, would reduce impacts from light and glare.

- No sign shall rotate, move or flash; however, a barber pole, certain electronic changeable copy signs and time, date and temperature devices may be permitted through design review (Section 10.10.340.F).
- All illuminated signs shall be designed in such a manner as to avoid undue glare or reflection of light that may diminish public safety, the quality of the city’s visual appearance or the quality of life of adjacent property owners or tenants (Section 10.10.100.K).
- No sign shall be erected at or near the intersection of any streets in such a manner as to obstruct free and clear vision; or at any location where by reason of the position, shape or color,

it may interfere with, obstruct the view of, or be confused with any authorized traffic sign, signal or device (Section 10.10.100.L).

Compliance with the above requirements would reduce light or glare impacts from the proposed sign to a less than significant level. The project would be located in an area with high levels of existing lighting and there are no light-sensitive uses present nearby. Therefore, the proposed project would not adversely affect day or nighttime views in the area. Impacts related to light and glare would be less than significant.

LESS THAN SIGNIFICANT IMPACT

2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project is located on Urban and Built-Up Land, per the Department of Conservation's (DOC) Important Farmland Finder (DOC 2016). The project site is not identified as any farmland type, it is not enrolled in Williamson Act contracts, and it does not support forest land or resources. The project site is not located on or adjacent to agricultural land or forest land and the project would not involve any development that could result in the conversion of farmland to non-agricultural uses. For these reasons, the project would have no impact with respect to conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use; conflict with existing agricultural zoning or Williamson Act contracts; result in the loss of forest land or conversion of forest land to non-forest use; or other conversion of farmland to non-agricultural use.

NO IMPACT

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3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Air Quality Standards and Attainment

The project site is located within the San Francisco Bay Area Air Basin (the Basin), which is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). As the local air quality management agency, the BAAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Depending on whether the standards are met or exceeded, the Basin is classified as being in “attainment” or “non-attainment.” Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The BAAQMD is in non-attainment for the state and federal ozone standards, the state and federal PM_{2.5} (particulate matter up to 2.5 microns in size) standards, and the state PM₁₀ (particulate matter up to 10 microns in size) standards and is required to prepare a plan for improvement (BAAQMD 2017a).

The health effects associated with criteria pollutants for which the Basin is in non-attainment are described in Table 2.

Table 2 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM ₁₀)	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma). ¹
Suspended particulate matter (PM _{2.5})	(1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma. ¹

¹ More detailed discussions on the health effects associated with exposure to suspended particulate matter can be found in the following documents: EPA, Air Quality Criteria for Particulate Matter, October 2004.

Source: U.S. EPA, <http://www.epa.gov/airquality/urbanair/>

Air Quality Management

The Bay Area 2017 Clean Air Plan provides a plan to improve Bay Area air quality and protect public health as well as the climate. The legal impetus for the Clean Air Plan is to update the most recent ozone plan, the 2010 Clean Air Plan, to comply with state air quality planning requirements as codified in the California Health and Safety Code. Although steady progress has been made toward reducing ozone levels in the Bay Area, the region continues to be designated as non-attainment for both the one-hour and eight-hour state ozone standards as noted previously. In addition, emissions of ozone precursors in the Bay Area contribute to air quality problems in neighboring air basins. Under these circumstances, state law requires the Clean Air Plan to include all feasible measures to reduce emissions of ozone precursors and reduce transport of ozone precursors to neighboring air basins (BAAQMD 2017a).

In 2006, the United States Environmental Protection Agency (U.S. EPA) tightened the national 24-hour PM_{2.5} standard for short-term exposure to fine particulate matter from 65 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) to 35 $\mu\text{g}/\text{m}^3$. Based on air quality monitoring data for years 2006 to 2008, the U.S. EPA designated the Bay Area as non-attainment for the 24-hour national standard in December 2008, which triggered the requirement for the BAAQMD to prepare a State Implementation Plan (SIP) submittal to demonstrate how the region would attain the standard. However, data for both the 2008-2010 and the 2009-2011 cycles showed that Bay Area PM_{2.5} levels meet the standard. On October 29, 2012, the U.S. EPA issued a proposed rule to determine that the Bay Area has attained the 24-hour PM_{2.5} national standard. Based on this, the Bay Area is required to prepare an abbreviated SIP submittal that includes an emission inventory for primary (directly-emitted) PM_{2.5}, as well as precursor pollutants that contribute to formation of secondary PM in the atmosphere and

amendments to the BAAQMD New Source Review to address PM_{2.5} (adopted December 2012).¹ However, key SIP requirements to demonstrate how a region will achieve the standard (i.e., the requirement to develop a plan to attain the standard) will be suspended as long as monitoring data continues to show that the Bay Area attains the standard.

In addition to preparing the “abbreviated” SIP submittal, the BAAQMD has prepared a report entitled *Understanding Particulate Matter: Protecting Public Health in the San Francisco Bay Area* (BAAQMD 2012). The report will help guide the BAAQMD’s ongoing efforts to analyze and reduce PM in the Bay Area to protect public health better. The Bay Area will continue to be designated as “non-attainment” for the national 24-hour PM_{2.5} standard until the district elects to submit a “redesignation request” and a “maintenance plan” to the U.S. EPA, and the agency approves the proposed redesignation.

Air Emission Thresholds

This analysis uses the BAAQMD’s May 2017 CEQA Air Quality Guidelines to evaluate air quality. The May 2017 Guidelines include revisions made to the 2010 Guidelines, addressing the California Supreme Court’s 2015 opinion in the *Cal. Bldg. Indus. Ass’n vs. Bay Area Air Quality Mgmt. Dist.*, 62 Cal. 4th 369 (BAAQMD 2017b). Therefore, the numeric thresholds in the May 2017 BAAQMD CEQA Air Quality Thresholds were used for this analysis to determine whether the impacts of the project exceed the thresholds identified in CEQA Guidelines Appendix G.

The BAAQMD has developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant air quality impacts. If all the screening criteria are met by a project, the lead agency or applicant would not need to perform a detailed air quality assessment of their project’s air pollutant emissions and air quality impacts would be considered less than significant. These screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration. For infill projects such as the proposed project, emissions would be less than the greenfield-type project on which the screening criteria are based; therefore, use of the screening criteria is a conservative approach (BAAQMD 2017b). The BAAQMD’s screening level sizes for hotels are 554 rooms for construction-related criteria pollutant emissions and 489 rooms for operational criteria pollutant emissions (BAAQMD 2017b).

In addition, for construction-related emissions to be considered less than significant, projects must meet the following criteria in addition to being below the applicable screening level (BAAQMD 2017b):

1. All *Basic Construction Mitigation Measures* would be included in the project design and implemented during construction; and
2. Construction-related activities would not include any of the following:
 - a. Demolition;
 - b. Simultaneous occurrence of more than two construction phases (e.g., paving and building construction would not occur simultaneously);

¹ PM is made up of particles emitted directly, such as soot and fugitive dust, as well as secondary particles formed in the atmosphere from chemical reactions involving precursor pollutants such as oxides of nitrogen (NO_x), sulfur oxides (SO_x), volatile organic compounds (VOC), and ammonia (NH₃).

- c. Simultaneous construction of more than one land use type (e.g., project would develop residential and commercial uses on the same site) (not applicable to high-density infill development);
- d. Extensive site preparation (i.e., greater than default assumptions used by the Urban Land Use Emissions Model [URBEMIS] for grading, cut/fill, or earth movement); or
- e. Extensive material transport (e.g., greater than 10,000 cubic yards of soil import/export) requiring a considerable amount of haul truck activity.

The project would not involve demolition or export of more than 10,000 cubic yards of soil. However, the project would include simultaneous occurrence of the building construction and paving phases and therefore does not meet all of the screening criteria for construction emissions. For projects that do not meet the screening criteria, BAAQMD provides numeric significance thresholds. Table 3 presents the significance thresholds for construction and operational-related criteria air pollutant and precursor emissions used for the purposes of this analysis. These thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the air basin's existing air quality conditions. For the purposes of this analysis, the proposed project would result in a significant impact if construction or operational emissions would exceed any of the thresholds shown in Table 3.

Table 3 Air Quality Thresholds of Significance

Pollutant	Construction Thresholds		Operational Thresholds	
	Average Daily Emissions (lbs/day)		Average Daily Emissions (lbs/day)	Maximum Annual Emissions (tons/year)
ROG	54		54	10
NO _x	54		54	10
PM ₁₀	82 (exhaust)		82	15
PM _{2.5}	54 (exhaust)		54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices		Not Applicable	

Source: BAAQMD 2017b

The California ambient air quality standards (CAAQS) for carbon monoxide (CO) are 9.0 parts per million (ppm) over an eight-hour period and 20.0 ppm over a one-hour period. BAAQMD provides a preliminary screening methodology to conservatively determine whether a proposed project would cause an exceedance of the CAAQS for CO. If the following criteria are met, a project would result in a less than significant impact related to local CO concentrations:

1. Project is consistent with an applicable congestion management program (CMP) established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans;
2. Project-related traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; and
3. Project-related traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

Impact Analysis

Methodology

The project's construction and operational emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2016.3.2. CalEEMod uses project-specific information, including the project's land uses, square footages for different uses (e.g., congregate care facility, enclosed parking structure), and location, to estimate a project's construction and operational emissions. Complete CalEEMod results and assumptions are provided in Appendix AQ.

Construction emissions modeled include emissions generated by construction equipment used on-site and emissions generated by vehicle trips associated with construction, such as worker and vendor trips. The construction schedule and list of construction equipment used in CalEEMod were largely based on CalEEMod defaults. However, the default grading phase was extended to account for excavation, and the default architectural coating phase was extended to better reflect actual construction practices. In addition, it was assumed that project construction would comply with all applicable regulatory standards, including BAAQMD Regulation 8, Rule 3 (Architectural Coatings), which restricts the volatile organic compound (VOC) content of flat coatings to 100 grams per liter and non-flat coatings to 150 grams per liter.

Operational emissions modeled include mobile source emissions (i.e., vehicle emissions), energy emissions, and area source emissions. Mobile source emissions consist of emissions generated by visitor and worker trips to and from the project site. Trip generation rates were based on the Institute of Transportation Engineers (ITE) *Trip Generation Handbook, 10th Edition* trip generation rates for Land Use Code 312 (Business Hotel).² In addition, the "Improve Destination Accessibility" and "Increase Transit Accessibility" features were utilized to account for the project's proximity to downtown South San Francisco (approximately 5.1 miles) and the Millbrae Station (approximately 0.5 mile), which is served by Bay Area Rapid Transit (BART) and Caltrain. Emissions attributed to energy use include emissions from natural gas consumption for space and water heating. Area source emissions are generated by landscape maintenance equipment, consumer products, and architectural coatings.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Vehicle use, energy consumption, and associated air pollutant emissions are related directly to population growth. A project may be inconsistent with the applicable air quality plan if it would result in either population or employment growth that exceeds growth estimates included in the plan. Such growth would generate emissions not accounted for in the applicable air quality plan emissions forecast. Therefore, projects need to be evaluated to determine whether they would generate population and employment growth and, if so, whether that growth would exceed the growth rates included in the applicable air quality plan. The most recent and applicable adopted air quality plan is the 2017 Clean Air Plan (BAAQMD 2017c). Therefore, the proposed project would result in a significant impact if it would conflict with or obstruct implementation of the 2017 Plan.

² The Transportation Study prepared in December 2019 (Appendix TRA) uses trip generation rates calculated using traffic counts for the existing hotels to evaluate the project's impacts to the transportation network. However, the supplemental trip generation memorandum prepared by Fehr & Peers for the project acknowledges that these trip generation rates are likely a conservative overestimate of the project's trip generation given the project's lack of restaurant and event facilities as compared to the existing hotels. Furthermore, the supplemental memorandum concludes that use of the ITE trip generation rates for Land Use Code 312 (Business Hotel) would be appropriate for the proposed project (Appendix TRA).

City of Millbrae
401 East Millbrae Avenue Project (Moxy Hotel)

As discussed in Section 13, *Population and Housing*, the project would generate approximately 44 new employment opportunities. According to growth projections from the Association of Bay Area Governments (ABAG), total employment in Millbrae was 6,470 in 2015 and is projected to grow to 6,630 in 2025, at which point the project would be operational. The incremental increase in employment associated with this project would not result in an increase in the number of jobs outside of ABAG growth projections (ABAG 2017), and therefore is within the BAAQMD Clean Air Plan (2017) projections. Therefore, the project would not conflict with or obstruct the implementation of an applicable air quality plan. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

Construction Emissions

Project construction would generate temporary air pollutant emissions associated with fugitive dust (PM₁₀ and PM_{2.5}) and exhaust emissions from heavy construction equipment and construction vehicles, in addition to reactive organic gases (ROG) that would be released during the drying phase of architectural coating. Construction would occur over approximately 16 months, and approximately 657 cubic yards of material would be exported off site. Table 4 summarizes the estimated maximum daily emissions of pollutants during project construction. As shown therein, construction-related emissions would not exceed the BAAQMD thresholds. Therefore, impacts would be less than significant.

Table 4 Estimated Daily Construction Emissions

	ROG	NO _x	CO	SO ₂	Exhaust PM ₁₀	Exhaust PM _{2.5}
Maximum Construction Emissions (lbs/day)	12.0	28.0	27.7	< 0.1	1.5	1.4
BAAQMD Thresholds	54	54	N/A	N/A	82	54
Threshold Exceeded?	No	No	N/A	N/A	No	No

ROG = reactive organic gases, NO_x = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter or less, PM_{2.5} = particulate matter 2.5 microns or less in diameter; lbs/day = pounds per day, BAAQMD = Bay Area Air Quality Management District

N/A = Not available. The BAAQMD has not established recommended quantitative thresholds for CO and SO₂.

Notes: All emissions modeling was completed using CalEEMod in accordance with applicant-provided information and data. Some numbers may not add up due to rounding. Emissions presented are the highest of the winter and summer modeled emissions.

See Appendix AQ for model output results.

Fugitive Dust

Site preparation and grading may cause wind-blown dust that could contribute particulate matter into the local atmosphere. The BAAQMD has not established a quantitative threshold for fugitive dust emissions but rather states that projects that incorporate best management practices (BMPs) for fugitive dust control during construction would have a less than significant impact related to fugitive dust emissions. The project does not include implementation of these BMPs; therefore, construction-related fugitive dust emissions would be potentially significant. Mitigation Measure

AQ-1 would reduce fugitive dust emissions to a less than significant level through the implementation of these BMPs.

Operational Emissions

Long-term emissions associated with project operation would include emissions from vehicle trips (mobile sources); natural gas and electricity use (energy sources); and landscape maintenance equipment, consumer products and architectural coating associated with on-site development (area sources). Table 5 and Table 6 summarize the total estimated daily and annual emissions associated with project operation, respectively. As shown therein, operational emissions generated by the proposed project would not exceed BAAQMD daily and annual thresholds for ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5}. Therefore, project operation would not result in a cumulatively considerable net increase of ROG, NO_x, exhaust PM₁₀, or exhaust PM_{2.5}, and impacts would be less than significant.

Table 5 Estimated Daily Operational Emissions

Emissions Source	Maximum Daily Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	Exhaust PM ₁₀	Exhaust PM _{2.5}
Area Sources	1.9	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1
Energy Sources	0.1	0.7	0.6	< 0.1	0.1	0.1
Mobile Sources	1.4	3.8	14.0	< 0.1	< 0.1	< 0.1
Total	3.4	4.5	14.6	< 0.1	0.1	0.1
BAAQMD Thresholds	54	54	N/A	N/A	82	54
Threshold Exceeded?	No	No	N/A	N/A	No	No

ROG = reactive organic gases, NO_x = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter or less, PM_{2.5} = particulate matter 2.5 microns or less in diameter; lbs/day = pounds per day, BAAQMD = Bay Area Air Quality Management District

N/A = Not available. The BAAQMD has not established recommended quantitative thresholds for CO and SO₂.

Note: All emissions modeling was completed made using the CalEEMod in accordance with applicant-provided information and data. Some numbers may not add up due to rounding. Emissions presented are the highest of the winter and summer modeled emissions. See Appendix AQ for model output results.

Table 6 Estimated Annual Operational Emissions

Emissions Source	Maximum Annual Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	Exhaust PM ₁₀	Exhaust PM _{2.5}
Area Sources	0.3	< 0.1	<0.1	< 0.1	< 0.1	< 0.1
Energy Sources	< 0.1	0.1	0.1	< 0.1	< 0.1	< 0.1
Mobile Sources	0.2	0.5	1.8	< 0.1	< 0.1	< 0.1
Total	0.5	0.6	1.9	< 0.1	< 0.1	< 0.1
BAAQMD Thresholds	10	10	N/A	N/A	15	10
Threshold Exceeded?	No	No	N/A	N/A	N/A	N/A

ROG = reactive organic gases, NO_x = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter or less, PM_{2.5} = particulate matter 2.5 microns or less in diameter; lbs/day = pounds per day, BAAQMD = Bay Area Air Quality Management District

N/A = Not available. The BAAQMD has not established recommended quantitative thresholds for CO, SO₂, PM₁₀, and PM_{2.5}.

Note: All emissions modeling was completed made using CalEEMod in accordance with applicant-provided information and data. Some numbers may not add up due to rounding

See Appendix AQ for model output results.

Mitigation Measure

AQ-1 Fugitive Dust Control Best Management Practices

The project construction contractor(s) shall implement the following fugitive dust control BMPs during site preparation and grading activities, as recommended by the BAAQMD:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times daily.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations (CCR)). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- A publicly-visible sign with the telephone number and person to contact at the City of Millbrae regarding dust complaints shall be posted. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Certain population groups, such as children, the elderly, and people with health problems, are particularly sensitive to air pollution. Sensitive receptors are defined as population groups that are more susceptible to exposure to pollutants and examples include health care facilities, retirement homes, school and playground facilities, and residential areas. The nearest sensitive receptors are the two existing hotels on the project site. Localized air quality impacts to sensitive receptors typically result from fugitive dust, CO, and toxic air contaminants (TACs). As discussed under criterion (b), project construction impacts related to fugitive dust emissions would be less than significant with mitigation incorporated. The proposed project's impacts related to CO hotspots and TACs are detailed below.

Carbon Monoxide Hotspots

As stated in the BAAQMD CEQA Guidelines, the proposed project would result in a less than significant impact related to local CO concentrations if the project is consistent with an applicable CMP; would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; and would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

The nearest CMP intersection is the SR 82/Millbrae Avenue intersection located approximately 0.4 mile to the west. The CMP's Level of Service (LOS) standard for the SR 82/Millbrae Avenue intersection is LOS E (City/County Association of Governments of San Mateo County 2019). According to the project transportation study (Appendix TRA), under 2040 plus Project conditions, this intersection would operate at LOS E, and the project would not have a cumulatively considerable contribution to traffic impacts at this intersection. Accordingly, the project would be consistent with the applicable CMP.

The highest volume intersection that would accommodate project traffic is the Rollins Road/Millbrae Avenue intersection. Weekday PM peak hour traffic volumes at this intersection under 2040 plus Project conditions would be approximately 6,531 vehicles, which is substantially below the 44,000 vehicle-per-hour threshold described above (Appendix TRA). Furthermore, none of the study area intersections are located in areas where vertical and/or horizontal mixing is substantially limited. Thus, the project would not result in individually or cumulatively significant impacts from CO emissions.

Toxic Air Contaminants

TACs are defined by California law as air pollutants that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. In the Bay Area, there are a number of urban or industrialized communities where the exposure to TACs is relatively high in comparison to others. According to Figure 5-1 of the BAAQMD CEQA Guidelines, the project site is located in an impacted community. Sources of TACs include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities (BAAQMD 2017b). The proposed project does not involve any of these uses; therefore, it would not introduce a new stationary source of TACs. In addition, there are no sensitive receptors located along the primary roadways that would accommodate project-related traffic. Accordingly, project operation would not generate a

substantial amount of mobile source TAC emissions that could affect nearby sensitive receptors. Impacts related to TAC emissions would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

During construction activities, heavy equipment and vehicles would emit odors associated with vehicle and engine exhaust and during idling. However, these odors would be intermittent and temporary and would cease upon completion. Overall, the proposed project would not generate objectionable odors affecting a substantial number of people. Construction-related odor impacts would be less than significant.

Table 3-3 in the BAAQMD's 2017 *CEQA Air Quality Guidelines* provides screening distances for land uses that have the potential to generate substantial odor complaints. The uses in the table include wastewater treatment plants, landfills or transfer stations, refineries, composting facilities, confined animal facilities, food manufacturing, smelting plants, and chemical plants (BAAQMD 2017b). Operation of the proposed hotel would therefore not generate objectionable odors that would affect a substantial number of people. Operational odor impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

4 Biological Resources

	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Setting

The project site is located at 401 E. Millbrae Avenue in an urbanized commercial area located just south of SFO and is bordered by Millbrae Avenue to the north and Highway 101 to the west.

Topography on the site is generally flat and ranges between 5 to 10 feet above mean sea level. The project site currently consists of a paved parking lot adjacent to a landscaped, vegetated area and undeveloped open lot located between two existing hotels. The landscaped areas consist of decorative lawn, ornamental trees and shrubs. The undeveloped portion of the site consists of heavily disturbed, graveled or bare ground with a mix of ornamental plantings and non-native, ruderal vegetation. El Portal Canal, a channelized creek that connects to the bay, is located approximately 160 feet south of the project site.

Regulatory Setting

Federal and State

Regulatory authority over biological resources is shared by federal, state, and local agencies under a variety of laws, ordinances, regulations, and statutes. Primary authority for biological resources lies within the land use control and planning authority of local jurisdictions (in this instance, the City of Millbrae).

The California Department of Fish and Wildlife (CDFW) is a trustee agency for biological resources throughout the State under CEQA and has direct jurisdiction under the California Fish and Game Code (CFG). Under the California Endangered Species Act (CESA) and the federal Endangered Species Act (FESA), the CDFW and the U.S. Fish and Wildlife Service (USFWS), respectively, have direct regulatory authority over species formally listed as threatened or endangered (and listed as rare for CDFW). Native and/or migratory bird species are protected under the CFG Sections 3503, 3503.5, and 3511.

Statutes within the Clean Water Act (CWA), CFG, and CCR protect wetlands and riparian habitat. The U.S. Army Corps of Engineers (USACE) has regulatory authority over wetlands and waters of the United States under Section 404 of the CWA. The State Water Resources Control Board and the nine Regional Water Quality Control Boards (RWQCBs) ensure water quality protection in California pursuant to Section 401 of the CWA and Section 13263 of the Porter-Cologne Water Quality Control Act. The CDFW regulates waters of the State under the CFG Section 1600 et seq.

Special status species are those plants and animals: 1) listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS and the National Marine Fisheries Service (NMFS) under the FESA; 2) listed or proposed for listing as Rare, Threatened, or Endangered by the CDFW under the CESA; 3) recognized as California Species of Special Concern (CSSC) by the CDFW; 4) afforded protection under CFG; and 5) occurring on Lists 1 and 2 of the CDFW California Rare Plant Rank (CRPR) system.

Methods

Literature Review and Desktop Biological Evaluation

Rincon Consultants, Inc. (Rincon) biologists reviewed agency databases, relevant literature, aerial photos, and site photos for baseline information on special status species and other sensitive biological resources occurring or potentially occurring at the project site and in the immediate surrounding area. The following sources were reviewed for background information:

- CDFW California Natural Diversity Data Base (CNDDDB) (CDFW 2019a) and Biogeographic Information and Observation System (BIOS) (CDFW 2019b)
- CDFW Special Animals List (CDFW 2019c) and Special Vascular Plants, Bryophytes, and Lichens List (CDFW 2019d)
- California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants of California (CNPS 2019)
- USFWS Information for Planning and Consultation (IPaC; USFWS 2019a)
- USFWS Critical Habitat Portal (USFWS 2019b)
- USFWS National Wetlands Inventory (NWI; USFWS 2019c)

Rincon biologists conducted a review of the CNDDDB (CDFW 2019a) for recorded occurrences of special status plant and wildlife taxa in the region prior to conducting a reconnaissance-level field survey. For this review, the search included all occurrences within the United States Geological Survey (USGS) 7.5-minute topographic quadrangle encompassing the project site (*Montara Mountain*), and the five surrounding quadrangles (*San Francisco South, Hunters Point, San Mateo, Half Moon Bay, and Woodside*).

Rincon compiled the results of the background literature review into a list of regionally occurring special status plants and animals and evaluated each species for potential to occur based on habitat conditions and proximity to known occurrences. Rincon also reviewed the NWI (USFWS 2019c) and the National Hydrography Datasets (USGS 2019) for potential aquatic resources, including jurisdictional waters of the United States or waters of the State.

- a. *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Special Status Plants

A review of agency databases for known special status plant occurrences within the six USGS quadrangles containing and surrounding the project site identified 66 special status plant species (CDFW 2019a; CNPS 2019; USFWS 2019a). All the reported species have specific habitat requirements (e.g., soil type, elevation, aspect, etc.). The existing conditions (previously developed and currently disturbed) and the lack of native vegetation communities or suitable ecological conditions on the site preclude the potential for rare plants to occur within the site. Because construction activities are limited to previously disturbed, developed, and landscaped areas with ornamental vegetation, impacts to special status plant species would not occur.

Special Status Wildlife

The review of the resource agency databases for known special status animal occurrences within the six USGS quadrangles containing and surrounding the project site identified 58 special status animal species (CDFW 2019a; CDFW 2019c; USFWS 2019a). This list was reviewed and refined according to the potential for species to occur on the project site based on the presence and quality of habitats within the project site. The site and surrounding vicinity are highly disturbed, dominated by buildings and paved areas. Vegetation is limited to landscaped areas and ornamental plantings. The site does not comprise any suitable habitat for federal or state listed species or other special status animals.

The site could be used by numerous species of migratory birds as nesting habitat. Migratory birds are protected under CFGC Section 3503. The nesting season generally extends from February 1 through August 31 in California but can vary based upon annual climatic conditions. Impacts to most non-listed bird species through nest destruction or abandonment would not be considered significant under CEQA; however, this would be a violation of CFGC code. Impacts to non-listed special status birds may be considered significant under CEQA if those impacts would jeopardize the viability of a local or regional population. Although the site could be used by numerous species of migratory birds as nesting habitat, their presence at the site is unlikely given its existing condition. Therefore, due to the lack of suitable habitat for federal or state listed species or other special status animals, including migratory birds, impacts on special status wildlife would be less than significant. Finally, to further reduce the potential for impacts in this regard, the City of Millbrae would apply a standard condition of approval requiring that tree removal conducted as a part of the project occur during non-breeding months.

LESS THAN SIGNIFICANT IMPACT

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The review of the resource agency databases for sensitive natural communities within the six USGS quadrangles containing and surrounding the project site identified four sensitive natural communities: northern coastal salt marsh, northern maritime chaparral, serpentine bunchgrass, and valley needlegrass grassland. None of these sensitive natural communities are present within or directly adjacent to the project site, nor any other sensitive natural communities. Therefore, no substantial adverse effect on sensitive natural communities would occur as a result of the project.

NO IMPACT

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Based on a review of information on biological resources within the project region and data collected during the reconnaissance site visit, no vegetated wetlands or potentially jurisdictional features occur within the project area. El Portal Canal, the channelized creek that lies approximately 170 feet from construction activities would occur, is classified by the NWI as both riverine wetland and an estuarine and marine wetland (USFWS 2019c). The creek is a concrete lined channel and is connected to the shoreline, also classified as an estuarine and marine wetland, by a culvert under Millbrae Avenue. The proposed project would occur entirely outside of the riverine/wetlands features, and would not involve direct removal, filling, or hydrological interruption. Moreover, as described in Section 10, *Hydrology and Water Quality*, the project would be required to comply with State and local regulations related to water quality and runoff control. Impacts to jurisdictional wetlands or waters would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The project area consists of developed and disturbed areas with primarily ornamental vegetation. Land use in the vicinity is primarily residential or commercial with no connectivity to natural habitats and is therefore not expected to support wildlife movement. No impacts to wildlife movement corridors would occur as a result of the project.

NO IMPACT

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The City of Millbrae's tree ordinance only governs the pruning and removal of street trees. Street trees are not expected to be impacted by the project, but if tree pruning or removal of street trees is required, the project will obtain necessary tree removal permits. Therefore, no conflicts with local policies or ordinances protecting biological resources would occur.

NO IMPACT

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

There are no habitat conservation plans, natural community conservation plans, or other similar plans that govern activities on the project site. Therefore, the proposed project would not conflict with a habitat conservation plan.

NO IMPACT

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5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

The project site is developed with a surface parking lot and two existing hotels. The existing buildings onsite are less than 50 years old. Based on age and architectural style, they do not appear eligible for, and are not currently listed in, the California Register of Historical Resources or the National Register of Historic Places. Therefore, project implementation would have no impact on historic resources.

NO IMPACT

b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

The results of a cultural resources records search conducted at the Northwest Information Center for the proposed project did not identify known archaeological resources within a 0.5-mile radius of the project site. Nevertheless, the discovery of unanticipated archaeological resources is a possibility during ground disturbance and impacts to unknown resources are potentially significant. The following mitigation measure would reduce impacts to a less than significant level.

Mitigation Measure

CUL-1 Unanticipated Discovery of Archeological Resources

If cultural resources are encountered during ground disturbing activities, work within 50 feet of the find shall be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (NPS 1983) shall be contacted immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and testing for the California Register of Historical Resources (CRHR) eligibility. If the discovery proves to be significant

under CEQA and cannot be avoided by the project, additional work, such as data recovery excavation, may be required to mitigate potentially significant impacts to archeological resources.

Significance After Mitigation

Implementation of Mitigation Measure CUL-1 would ensure that archaeological resources encountered during construction activities would be properly protected. This measure would reduce impacts to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

The discovery of human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance may occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the county coroner must be notified immediately. If the human remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission which will determine and notify a most likely descendant (MLD). The MLD would complete the inspection of the site and provide recommendations for treatment to the landowner within 48 hours of being granted access. With adherence to existing regulations, impacts to human remains would be less than significant.

LESS THAN SIGNIFICANT IMPACT

6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

Energy use relates directly to environmental quality, since it can adversely affect air quality and can generate GHG emissions that contribute to climate change. Fossil fuels are burned to create electricity that powers residences and commercial/industrial buildings, heats and cools buildings, and powers vehicles. Transportation energy use is related to the fuel efficiency of cars, trucks, and public transportation; choice of different travel modes such as auto, carpool, and public transit; and miles traveled by these modes. Construction and routine operation and maintenance of transportation infrastructure also consume energy.

Energy use is typically quantified using the British Thermal Unit (BTU). The BTU is the amount of energy that is required to raise the temperature of one pound of water by 1 degree Fahrenheit. As points of reference, the approximate amount of energy contained in a gallon of gasoline, a cubic foot of natural gas, and a kilowatt hour (kWh) of electricity are 123,000 BTUs, 1,000 BTUs, and 3,400 BTUs, respectively. Natural gas usage is expressed in therms. A therm is equal to 100,000 BTU.

Electricity

Until 2016, the City of Millbrae was served solely by Pacific Gas & Electric (PG&E) to meet power demands; in July 2016, PG&E customers in Millbrae and San Mateo County were enrolled with the Peninsula Clean Energy (PCE) community choice energy program. PCE enables communities to choose clean-sourced power at a cost equivalent to PG&E rates. Although PCE will purchase the electricity, PG&E will continue to deliver electricity to homes and businesses using existing transmission and delivery lines. PG&E will still handle all trouble calls, issue and collect monthly utility bills, and offer the same rebate and assistance programs currently available (City of Millbrae 2016a).

PCE provides more carbon-free electricity than PG&E and plans for and secures commitments from a diverse portfolio of energy-generating resources to reliably serve the electric energy requirements of its customers. According to PCE's Integrated Resource Plan, the main strategic goal is to provide a diverse energy portfolio free from GHG emissions. PCE's service territory covers the 20 cities located

City of Millbrae
401 East Millbrae Avenue Project (Moxy Hotel)

in San Mateo County, plus the unincorporated areas of the County. Within this service area, PCE serves approximately 300,000 customer accounts representing approximately 765,000 residents (PCE 2018). PCE's electricity load in 2016 was 277 gigawatt hours (GWh) and 3,026 GWh in 2017 (PCE 2018). The projected load for 2018 and the immediate future is approximately 3,700 GWh. PCE's 2016 load represented only the first phase of enrollments for 25 percent of the year. Beyond its current contractual commitments, PCE will procure additional energy products to ensure that the future energy needs of its customers are met in a reliable, cost-effective manner.

According to the CEC, San Mateo County consumed approximately 4,225.6 GWh in 2018, or approximately 14,417 billion Btu (CEC 2018a). Table 7 illustrates the County's 2018 electricity consumption in comparison to statewide consumption and displays the County's equivalent per capita energy consumption from its electricity demand. With a population of 769,545 in 2018, San Mateo County's 2018 per capita electricity consumption was approximately 5,491 kWh, or 18.7 million Btu.

Table 7 2018 Annual Electricity Consumption

Energy Type	San Mateo County (GWh)	California (GWh)	Proportion of Statewide Consumption	County per Capita Consumption (kWh)	County per Capita Consumption (MMBtu)
Electricity (MWh)	4,225.6	281,120.2	1.5%	5,491.0	18.7

Notes: Electricity consumption volumes for San Mateo County and California are expressed in gigawatt-hours (GWh) while County per capita consumption is expressed in kilowatt-hours (kWh) and millions of Btu (MMBtu).

Source: CEC 2018a

Natural Gas

Millbrae falls within PG&E's natural gas service area, which spans central and northern California (CEC 2018c). In 2018, PG&E customers consumed a total of 4.8 billion therms of natural gas. Residential users accounted for approximately 40 percent of PG&E's natural gas consumption. Industrial and commercial users accounted for another 36 and 20 percent, respectively. The remainder was used for mining, construction, agricultural, and water pump accounts (CEC 2018c).

According to the CEC, San Mateo County consumed approximately 209.7 million therms of natural gas in 2018, or approximately 19,493 billion Btu (CEC 2018e). In 2018, San Mateo County users accounted for approximately 4.3 percent of PG&E's total natural gas consumption across the entire service area.

Table 8 illustrates the County's 2017 natural gas consumption in comparison to statewide consumption and displays the County's equivalent per capita energy consumption from its natural gas demand. With a population of 769,545 in 2018, San Mateo County's 2018 per capita natural gas consumption was approximately 273 therms, or approximately 25 million Btu.

Table 8 2017 Annual Natural Gas Consumption

Energy Type	San Mateo County (U.S. therms)	California (U.S. therms)	Proportion of Statewide Consumption	County per Capita Consumption (U.S. therms)	County per Capita Consumption (MMBtu)
Natural Gas	209,663,993	12,638,157,740	1.7%	272.5	25.3

Notes: Natural gas consumption volumes for San Mateo County and California are expressed in U.S. Therms while County per capita consumption is expressed in U.S. Therms and millions of Btu (MMBtu).

Source: CEC 2018e

Methodology

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate air quality and GHG emissions resulting from the proposed project. The CalEEMod results (provided in Appendix AQ) provide the average travel distance, vehicle trip numbers, and vehicle fleet mix during project construction and operation. The CalEEMod results also provide the estimated gross electricity and natural gas consumption by land use during project operation. The values contained therein are used in this analysis to determine the anticipated energy consumption during construction and operation. In addition, the analysis takes into consideration the daily trips generated by the project.

- a. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Construction Energy Demand

During project construction, energy would be consumed in the form of petroleum-based fuels used to power construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. The project would require grading, including hauling material off-site; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping.

The total consumption of gasoline and diesel fuel during project construction was estimated using the assumptions and factors from CalEEMod (Appendix AQ).

Table 9 presents the estimated energy consumption during the construction phase. As shown, construction equipment, hauling/vendor trips, and worker trips would consume approximately 46,158 gallons of fuel over the project construction period. Construction equipment would consume an estimated 37,879 gallons of fuel; vendor and hauling trips would consume approximately 3,838 gallons of fuel; and worker trips would consume approximately 4,440 gallons of fuel over the project construction.

Table 9 Estimated Fuel Consumption during Construction

Fuel Type	Gallons of Fuel	MMBtu ⁴
Diesel Fuel (Construction Equipment) ¹	37,879	4,828
Diesel Fuel (Hauling and Vendor Trips) ²	3,838	489
Other Petroleum Fuel (Worker Trips) ³	4,440	487
Total	46,157	5,804

¹ Fuel demand rate for construction equipment is derived from the total hours of operation, the equipment's horse power, the equipment's load factor, and the equipment's fuel usage per horse power per hour of operation, which are all taken from CalEEMod outputs (see Appendix AQ), and from compression-ignition engine brake-specific fuel consumptions factors for engines between 0 to 100 horsepower and greater than 100 horsepower (U.S. EPA 2018). Fuel consumed for all construction equipment is assumed to be diesel fuel.

² Fuel demand rate for hauling and vendor trips is derived from hauling and vendor trip number, hauling and vendor trip length, and hauling and vendor vehicle class from "Trips and Vehicle Miles Traveled" Table contained in Section 3.0, *Construction Detail*, of the CalEEMod results (see Appendix AQ). The fuel economy for hauling and vendor trip vehicles is derived from the United States Department of Transportation (DOT 2018). Fuel consumed for all hauling trucks is assumed to be diesel fuel.

³ The fuel economy for worker trip vehicles is derived from DOT National Transportation Statistics (24.2 mpg) (DOT 2018). Fuel consumed for all worker trips is assumed to be gasoline fuel.

⁴ CaRFG CA-GREET 2.0 fuel specification of 109,786 Btu/gallon used to identify conversion rate for fuel energy consumption for worker trips specified above (CARB 2015). Low-sulfur Diesel CA-GREET 2.0 fuel specification of 127,464 Btu/gallon used to identify conversion rate for fuel energy consumption for construction equipment specified above. Totals may not add up due to rounding.

The construction energy estimates represent a conservative estimate as the construction equipment was assumed to be operating every day of construction. Construction equipment would be maintained to applicable standards as required, and construction activity and associated fuel consumption and energy use would be temporary and typical for construction sites. It is also reasonable to assume contractors would avoid wasteful, inefficient, and unnecessary fuel consumption to reduce construction costs. Therefore, the proposed project would not involve the inefficient, wasteful, or unnecessary use of energy during construction; construction energy impacts would be less than significant.

Operational Energy Demand

As the project would increase vehicle trips to and from the project site compared to existing conditions, gasoline consumption would increase. The project would increase annual operational gasoline consumption by approximately 64,129 gallons per year and operational diesel consumption by approximately 11,884 gallons per year, for a total increase of approximately 76,013 gallons of fuel per year (Appendix AQ). The fuel consumed by the project would be typical of hotel projects.

In addition to transportation energy use, project operation would require permanent grid connections for electricity and natural gas. Electricity and natural gas would be used for heating and cooling systems, lighting, appliances, water use, and the overall project operation. Approximately 1,959 million BTU (MMBtu) per year or approximately 0.57 GWh of electricity would be consumed at the project site, primarily for lighting and appliances (Appendix AQ). This represents an insignificant increase in the County's existing use. Approximately 2,791 MMBtu per year or 0.03 MMThm per year of natural gas would be consumed at the project site, primarily for heating throughout the hotel and cooking in kitchens (Appendix AQ). The natural gas demand of the proposed project would be served by PG&E, which provided 4,794 MMThm per year in 2018; therefore PG&E would have sufficient supplies to serve the proposed project (CEC 2018d). Table 10

shows the project's estimated total annual gasoline and diesel fuel consumption, as well as electricity and natural gas use.

Table 10 Proposed Project Operational Energy Usage

Source	Energy Consumption	
Vehicle Trips		
Gasoline	64,129 gallons	7,040 MMBtu ¹
Diesel	11,884 gallons	1,515 MMBtu ¹
Built Environment		
Electricity	0.57 GWh	1,959 MMBtu
Natural Gas Usage	0.03 MMthm	2,791 MMBtu

Source: Appendix AQ

¹ CaRFG fuel specification of 109,786 Btu/gallon used to identify conversion rate for fuel energy consumption for vehicle classes specified above (CARB 2015).

The project would be required to comply with standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. California's Green Building Standards Code (CALGreen; CCR, Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the CEC. As the name implies, these standards are specifically crafted for new buildings to result in energy efficient performance, so the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. For example, according to the CEC, nonresidential buildings will use about 30 percent less energy primarily due to lighting upgrades (CEC 2018b). Furthermore, the project would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by PCE or PG&E continue to increase to comply with state requirements through Senate Bill 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045. Project construction would be temporary and typical of similar projects; it would not result in wasteful use energy. Project operation would increase energy use on the site compared to existing conditions. However, the energy use would be in conformance with the latest version of CALGreen and the Building Energy Efficiency Standards. Additionally, the electricity and natural gas use would not result in a significant increase for PCE or PG&E. Therefore, the project would not result in wasteful or unnecessary energy consumption, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

As discussed above, SB 100 mandates 100 percent clean electricity for California by 2045. Because the project would be powered by the existing electricity grid, the project would eventually be powered by renewable energy mandated by SB 100 and would not conflict with this statewide plan. The project would be required to comply with California's Green Building Standards Code and the

Building Energy Efficiency Standards, which contain energy efficiency requirements. The City of Millbrae does not have an adopted Climate Action Plan that includes energy reduction strategies and policies. However, the City's Parks, Open Space and Conservation in the General Plan contains policies which seek to encourage energy conservation (City of Millbrae 1998). Table 11 includes a consistency analysis with policies that are applicable to the proposed project.

Table 11 General Plan Energy Policy Consistency Analysis

Applicable Policies	Consistent?
PC6.15: Energy Efficiency. Title 24. Require that all new buildings and additions in the City be in compliance with the energy efficiency standards of Title 24 of the California State Building Code.	Yes; the project would comply with the latest Title 24 standards.
PC6.18: Energy Conservation. Promote energy conservation in new and existing development and encourage use of alternative energy sources, including passive heating and cooling, by allowing variances to site or building requirements (i.e., setbacks, lot coverage, building height, etc.) where consistent with public health and safety.	Yes; the project would comply with California's Green Building Standards Code, which includes energy conservation measures.

As shown in Table 11, the project would not conflict with the applicable policies in the City's General Plan. Therefore, the project would not conflict with or obstruct a local plan for renewable energy or energy efficiency and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

The project area is situated in the eastern most area of Millbrae, between the Santa Cruz Mountains to the southwest and the San Francisco Bay to the east in the Coast Ranges geomorphic province of California (California Geological Survey 2002). The Coast Ranges extend about 600 miles from the Oregon border to the Santa Ynez River in Santa Barbara County and are characterized by numerous north-south-trending peaks and valleys that range in elevation from approximately 500 feet above mean sea level to 7,581 feet above mean sea level (Norris and Webb 1990). The Coast Ranges are composed of a complex assemblage of geologic units, including Mesozoic metasedimentary rocks and ophiolite rocks of the Franciscan Assemblage, granitic and metamorphic rocks of the Mesozoic Salinian Block, and younger Cenozoic marine and nonmarine shale, sandstone, and conglomerate (Bartow and Nilsen 1990). Near the project area, the Coast Ranges are transected by several major active or recently active faults. The San Andreas Fault system, including the Monte Vista-Shannon Fault, exists within the Santa Cruz mountains to the southwest. The Hayward and Calaveras Fault systems exist within the Diablo Range to the east. The northwest-trending San Andreas Fault lies approximately 1.5 miles southwest of the project site (Hellel et al. 1979).

Impact Analysis

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

The project site is not located within an identified earthquake fault zone as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, and no known fault lines are located on the site (DOC 2017). The closest active fault is the San Andreas Fault, located approximately 1.5 miles southwest of the site. Thus, the likelihood of surface rupture occurring from active faulting at the site is remote. The project site would not be subject to ground rupture. No impact would occur.

NO IMPACT

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

As with any site in the San Francisco Bay Area region, the project site is susceptible to strong seismic ground shaking in the event of a major earthquake. Nearby active faults include the Northern San Andreas Fault, the Monte Vista-Shannon Fault, the Calaveras Fault, the San Gregorio Fault, and the Hayward-Rogers Creek Fault (City of Millbrae 2015). These are capable of producing strong seismic ground shaking at the project site. The project would be required to comply with the applicable provisions set forth by the CBC, including seismic design standards contained in Chapters 16 and 18 (CDGS 2019). With adherence to modern construction practices, impacts related to seismic ground shaking would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*
- a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*

Earthquakes can trigger landslides that may cause injuries and damage to many types of structures. Landslides are typically a hazard on or near slopes or hillside areas, rather than generally level areas like the project site and vicinity. The project site is flat and is not located in an earthquake induced landslide area according to the CGS San Mateo Quadrangle (CGS 2018). No impact would occur.

NO IMPACT

- b. Would the project result in substantial soil erosion or the loss of topsoil?*

The project site is developed and generally level, which limits the potential for substantial soil erosion. The grading and excavation phase when soils are exposed has the highest potential for erosion. Ground-disturbing activities that would occur with implementation of the proposed project would include site-specific grading for foundations and building pads. Temporary erosion could occur during project construction. However, the project would involve ground disturbance of approximately one acre of lot area and would therefore be required to comply with erosion control standards administered by the San Francisco Bay RWQCB through the National Pollutant Discharge Elimination System (NPDES) permit process. The process requires preparation of a Stormwater Pollution Prevention Plan and implementation of nonpoint source control of stormwater runoff. Furthermore, the project would be subject to Chapter 8.70 of the MMC, which pertains to management of stormwater and discharge. The chapter states that BMPs shall be incorporated into project construction when feasible, such as use of filter materials at catch basins, to prevent the loss of soil into the city's stormwater system.

Moreover, as discussed under criteria (a) and (g) of Section 10, *Hydrology and Water Quality*, the proposed project would not result in substantial soil erosion or loss of topsoil. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*
- d. Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Liquefaction is a condition that occurs when unconsolidated, saturated soils change to a near-liquid state during ground shaking. According to Local Hazard Mitigation Maps from ABAG, the project site lies in an area with a high potential for liquefaction (ABAG 2005). Potential ground failure associated with liquefaction could cause substantial damage to the project. However, the project would be built using modern engineering and seismic safety design techniques and would be required to meet the mandatory requirements of the 2019 CBC, including provisions outlined in Chapter 18, *Soils and Foundations* (CDGS 2019). Furthermore, the CBC requires that a site-specific geotechnical investigation study be prepared for projects located in areas of high liquefaction potential. Therefore, a site-specific geotechnical investigation identifying the exact liquefaction potential and associated risk would be required under the CBC (CDGS 2019). Subsequently, recommendations for

soil stabilization and project design provided in the geotechnical investigation, or equivalent, would be incorporated into the project to prevent liquefaction hazards. Therefore, with adherence to the CBC and associated geotechnical investigation requirements, impacts related to liquefaction would be less than significant.

Expansive soils tend to swell with seasonal increases in soil moisture and shrink during the dry season as soil moisture decreases. Site specific geotechnical investigations conducted on a nearby property³ found that soils exhibited a variable degree of expansion potential, ranging from low to moderate (City of Millbrae 2015). As described above, the project would be built using modern engineering and would be required to conform to the 2019 CBC, which contains provisions related to expansive soils. The exact nature and shrink-swell potential of soils at the project site is required to be evaluated during the geotechnical investigation required under the CBC. If expansive soils are present at the project site, site-specific design recommendations would be incorporated into the project to address related hazards. Therefore, with adherence to the CBC and associated geotechnical investigation requirements, impacts related to expansive soils, including landslide, lateral spreading, subsidence, and collapse and therefore risk to life or property would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

The City of Millbrae operates a publicly owned treatment works, which includes a wastewater collection system. No septic systems would be built for the project. No impact would occur.

NO IMPACT

f. *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The paleontological sensitivity of the geologic units that underlie the project site was evaluated using the results of the paleontological locality search and review of existing information in the scientific literature concerning known fossils within those geologic units. Rincon examined fossil collections records from the University of California Museum of Paleontology (UCMP) online database, which contains known fossil localities in San Mateo County.

Following the literature review and museum record search, a paleontological sensitivity classification was assigned to the geologic units within the project site. The potential for impacts to significant paleontological resources is based on the potential for ground disturbance to directly impact paleontologically sensitive geologic units.

The project site is immediately underlain by artificial fill (Qf₁). Artificial fill consists of recently compacted, disturbed sediments related to prior development (e.g., building-site grades) and as such, has a low paleontological resource potential. At shallow depth, artificial fill is underlain by soft Bay Mud deposits of Holocene age (Qm) consisting of blue-gray to black silty clay with interspersed layers of sand, gravel, peat, and shell fragments. Intact (native) Holocene sedimentary deposits underlying the project site, particularly those younger than 5,000 years old, are too young to

³ Geotechnical investigations conducted for the Millbrae Station Area Specific Plan EIR. Soils samples analyzed for the Specific Plan Area range from approximately 0.3 to 0.6 mile from the project site.

preserve paleontological resources (SVP 2010). Therefore, Bay Mud deposits have been assigned a low paleontological sensitivity.

A search of the paleontological locality records maintained by UCMP's online database resulted in no previously recorded vertebrate fossil localities within Holocene sedimentary deposits in the project vicinity.

Artificial fill and Bay Mud deposits in the project area are determined to have a low paleontological resource potential. Therefore, impacts to paleontological resources are considered very unlikely as a result of the project and further paleontological resource management would not be required. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. *Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

Overview of Greenhouse Gas (GHG) Emissions

GHGs are gases that absorb and re-emit infrared radiation in the atmosphere. The gases widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO₂ and CH₄ are emitted in the greatest quantities from human activities. Emissions of CO₂ are largely by-products of fossil fuel combustion, whereas CH₄ results from off-gassing associated with agricultural practices and landfills. Anthropogenic GHGs, many of which have greater heat-absorption potential than CO₂, include fluorinated gases, such as hydrofluorocarbons (HFC), perfluorocarbons (PFC), and SF₆ (U.S. EPA 2018).

California Air Resources Board (CARB) is responsible for the coordination and oversight of state and local air pollution control programs in California. California's major initiative for reducing GHG emissions is outlined in Assembly Bill (AB) 32, the "California Global Warming Solutions Act of 2006," which was signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline (i.e., the 2008 Scoping Plan). On September 8, 2016, the governor signed SB 32 into law, extending AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target.

The City of Millbrae completed a baseline 2005 GHG emissions inventory that estimated communitywide emissions of 123,999 metric tons (MT) of carbon dioxide equivalents (CO₂e) per year. The primary emissions sources were transportation (approximately 50.1 percent), residential uses (approximately 26.1 percent), and commercial uses (approximately 16.2 percent) (City of Millbrae 2005).

Impact Analysis

Methodology

Calculations of CO₂, CH₄, and N₂O emissions are provided to identify the magnitude and nature of the proposed project's potential GHG emissions and environmental effects. Emissions of all GHGs are converted into their equivalent global warming potential (GWP) in MT of CO₂e. GHG emissions associated with the proposed project were calculated using CalEEMod version 2016.3.2 (see Appendix AQ for CalEEMod outputs). Construction emissions were amortized over a period of 30 years and added to annual operational emissions in accordance with BAAQMD guidance (BAAQMD 2017b). Emissions are calculated for year 2030 for the purpose of comparing project emissions to the locally-appropriate, project-specific efficiency threshold, which is based on the State's 2030 GHG emission reduction target (see *Significance Thresholds* below).

The project would be served by PG&E; therefore, PG&E's specific energy intensity factors (i.e., the amount of CO₂, CH₄, and N₂O per kilowatt-hour) are used in the calculations of GHG emissions. Per SB 100, the statewide Renewable Portfolio Standard (RPS) Program requires electricity providers to increase procurement from eligible renewable energy sources to 60 percent by 2030. However, the default energy intensity factors included in CalEEMod for PG&E are based on 2009 data at which time PG&E had only achieved a 14.1 percent procurement of renewable energy. To account for the continuing effects of the RPS, the energy intensity factors included in CalEEMod were reduced based on the mandated SB 100 target for 2030. PG&E energy intensity factors that include this reduction are shown in Table 12.

Table 12 PG&E Energy Intensity Factors

	2009 (lbs/MWh) ¹	2030 (lbs/MWh) ²
Percent procurement	14.1%	60%
Carbon dioxide (CO ₂)	641.35	298.65
Methane (CH ₄)	0.029	0.014
Nitrous oxide (N ₂ O)	0.006	0.003

¹ Source: California Public Utilities Commission 2011

² RPS goal established by SB 100

Because project construction would begin in Fall 2020, the project would be constructed in accordance with the 2019 Building Energy Efficiency Standards. Nonresidential buildings built in accordance with the 2019 Building Energy Efficiency Standards will use approximately 30 percent less energy than those constructed under the 2016 standards (CEC 2018). Therefore, the energy reductions achieved via compliance with the 2019 Building Energy Efficiency Standards were included in CalEEMod.

New development would also be subject to CalGreen, which requires a 20 percent increase in indoor water use efficiency. Thus, to account for compliance with CalGreen, a 20 percent reduction in indoor water use was included in the water consumption calculations for the proposed project.

Vehicle emissions are calculated based on the vehicle type and the trip rate for each land use. Trip generation rates were based on the Institute of Transportation Engineers (ITE) *Trip Generation Handbook, 10th Edition* trip generation rates for Land Use Code 312 (Business Hotel).⁴ In addition, the “Improve Destination Accessibility” and “Increase Transit Accessibility” features were utilized to account for the project’s proximity to downtown South San Francisco (approximately 5.1 miles) and the Millbrae Station (approximately 0.5 mile), which is served by BART and Caltrain. Because CalEEMod does not calculate N₂O emissions from mobile sources, N₂O emissions were quantified using guidance from CARB and the Emission Factors (EMFAC) 2017 Emissions Inventory for the San Mateo County region for the year 2030 (the next State milestone target year for GHG emission reductions) using the EMFAC2011 categories (CARB 2018a and 2019; see Appendix AQ for calculations).

Significance Thresholds

CEQA Guidelines Section 15064.4(b) states that a lead agency should consider the following factors, among others, when assessing the significance of impacts from GHG emissions on the environment:

1. The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project’s incremental contribution of GHG emissions.

Most individual projects do not generate sufficient GHG emissions to create significant project-specific environmental effects. However, the environmental effects of a project’s GHG emissions can contribute incrementally to cumulative environmental effects that are significant, contributing to climate change, even if an individual project’s environmental effects are limited (CEQA Guidelines Section 15064[h][1]). The issue of a project’s environmental effects and contribution towards climate change typically involves an analysis of whether a project’s contribution towards climate change is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines Section 15064[h][1]).

CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by

⁴ The Transportation Study (Appendix TRA) uses trip generation rates calculated using traffic counts for the existing hotels to evaluate the project’s impacts to the transportation network. However, the supplemental trip generation memorandum prepared by Fehr & Peers in April 2020 for the project acknowledges that these trip generation rates are likely a conservative overestimate of the project’s trip generation given the project’s lack of restaurant and event facilities as compared to the existing hotels. Furthermore, the supplemental memorandum concludes that use of the ITE trip generation rates for Land Use Code 312 (Business Hotel) would be appropriate for the proposed project (Appendix TRA).

other public agencies, or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (CEQA Guidelines Section 15064.7[c]).

According to the CEQA Guidelines Section 15183.5, projects can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals (AEP) in their white paper, *Beyond Newhall and 2020*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions (AEP 2016). However, although the City has completed inventories of community and municipal emissions, the City has not adopted a qualified GHG reduction plan and thus this approach is not currently feasible.

Instead, this analysis evaluates GHG emissions generated by the proposed project against a locally-appropriate, project-specific efficiency threshold derived from the SB 32 target and the City's GHG inventory from 2005, which is consistent with current best practices in the industry (AEP 2016). This provides a quantitative assessment of the project's GHG emissions compared to a project-specific threshold. Because the GHG emissions target set by SB 32 is significantly more stringent than the AB 32 target, if the project is found to be consistent with the SB 32 emission reduction target, then it is considered consistent with the AB 32 reduction target as well.

The locally-appropriate, project-specific efficiency threshold used in this analysis was created to comply with the CEQA Guidelines and interpretative GHG case law. An efficiency threshold is calculated by dividing the allowable GHG emissions inventory in a selected calendar year by the service population (residents plus employees) in that year. This calculation identifies the quantity of emissions that can be generated on a per-service population basis without significantly impacting the environment. This approach is appropriate for the proposed project because it measures the project's emissions on a local per-service population basis to determine its overall GHG emissions efficiency relative to regulatory GHG emission reduction goals.

For the proposed project, an efficiency threshold was calculated based on the target GHG emission levels that would be consistent with the State 2030 target using the service population of the City of Millbrae in year 2030. This locally-appropriate, project-specific quantitative threshold is derived, in part, from the City's 2005 GHG inventory in line with CARB's recommendations in the 2008 Climate Change Scoping Plan and the 2017 Scoping Plan (CARB 2008; 2017). Consistent with the legal guidance provided in the Golden Door (2018) and Newhall Ranch (2015) decisions, regarding the correlation between state and local conditions, the City's 2005 GHG inventory was used to calculate a locally-appropriate, evidence-based, project-specific threshold consistent with California's SB 32 target. Accordingly, the threshold established in this report is a project-specific threshold, as opposed to a threshold for general use.

The City completed a 2005 GHG inventory that calculated communitywide emissions of 123,999 MT of CO₂e per year (Table 13). Because the proposed project is a hotel, the Commercial, Transportation, and Waste sectors are appropriate to use in developing a project-specific threshold because future guests and employees of the project would consume energy, generate on-road vehicle trips, and produce waste. Therefore, the residential, district, direct access, and city operations sectors were conservatively excluded for the emissions total for project-applicable sectors. Because these sector emissions would not be applicable to the proposed project, these emissions were subtracted from the total emissions to calculate a project-applicable emissions total of 84,729 MT of CO₂e per year.

Table 13 City of Millbrae 2005 Inventory

Source	2005 Total (MT of CO ₂ e)
Residential	32,405
Commercial	20,122
District Government ¹	2,493
Direct Access Electricity ²	2,727
Transportation	62,141
Waste	2,466
City Operations	1,645
Total Emissions	123,999
Emissions from Project-Applicable Sectors³	84,729

¹ District accounts include any district government account within incorporated Millbrae, such as the Bay Area Rapid Transit (BART), School Districts, Hospital Districts, Water or Sewer Districts, District Fairs, Public Utility Districts, Community Service Districts, Cemetery Districts, Mosquito Abatement Districts and Park Districts.

² Direct access customers are those electricity customers that purchase electricity directly from power generation facilities, which is delivered through the transmission lines of public or private utility. Direct access customers are typically large electricity users, such as BART.

³ Does not include Residential, Direct Access Electricity, City Government/Municipal Operations, or District Government.

Source: City of Millbrae 2005

AB 32 set a statewide target of reducing GHG emissions to 1990 levels by 2020. Therefore, for the City of Millbrae to be consistent with AB 32, annual GHG emissions levels from project-applicable sectors would need to be reduced by 15 percent below 2005 levels by 2020 to approximately 72,020 MT of CO₂e per year. In addition, SB 32 set a statewide GHG emission reduction target of 40 percent below 1990 levels. Therefore, annual GHG emissions levels from project-applicable sectors would need to be reduced by 40 percent below 1990 levels to approximately 43,212 MT of CO₂e per year to be consistent with SB 32.

Accordingly, the 2030 project-specific efficiency threshold can be calculated by dividing total citywide GHG emissions by the citywide service population (residents + employees) for year 2030. Based on ABAG's Projections 2040 tool, the City's 2030 service population would be approximately 33,475 persons (26,745 residents plus 6,730 jobs) (ABAG 2017a). Therefore, the 2030 locally-appropriate, project-specific threshold would be approximately 1.3 MT of CO₂e per year (see Table 14).

Table 14 Locally-Applicable Project-Specific Efficiency Threshold

Target Year	Value
2005 Baseline Levels ¹	84,729 MT of CO ₂ e/year
2020 Target (AB 32) ²	72,020 MT of CO ₂ e/year
2030 Target (SB 32) ³	43,212 MT of CO ₂ e/year
2030 Service Population ⁴	33,475 persons
2030 Project-Specific Efficiency Threshold	1.3 MT of CO₂e per service person per year

¹ 2005 emission levels from project-applicable sectors (Table 13)
² AB 32 sets a target of reducing GHG emissions to 1990 levels (i.e., 15 percent below 2005 levels) by 2020.
³ SB 32 sets a target of reducing GHG emissions 40 percent below 1990 levels by 2030.
⁴ 26,745 residents + 6,730 jobs (ABAG 2017a)

To compare the estimated project emissions to the locally-applicable, project-specific efficiency threshold, the project's per person GHG emissions were calculated by dividing total GHG emissions by the project's service population. Because the project is a hotel with a café and bar, the service population is equivalent to the sum of its employees, guests, and café and bar patrons as shown in Table 15.

Table 15 Project-Specific Service Population

Population	Persons
Employees ¹	44
Average Hotel Guests ²	235
Average Café and Bar Patrons ³	21
Total Service Population	300

¹ See Section 14, *Population and Housing*.

² 209 hotel rooms with approximately 1.5 persons per room and average occupancy rate of 75 percent = 235 persons

³ 750 combined square feet of café/bar space with an assumed 1 person per 18 square feet and average occupancy rate of 50 percent = 21 persons

Construction Emissions

Project construction would generate temporary GHG emissions primarily due to the operation of construction equipment and truck trips. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. Emissions generated by construction of the proposed project would be approximately 507 MT of CO₂e (Table 16). Amortized over 30 years, this is equivalent to approximately 17 MT of CO₂e per year.

Table 16 Estimated Construction GHG Emissions

Year	Project Emissions (MT of CO ₂ e)
2020	263.7
2021	243.3
Total	507.0
Total Amortized over 30 Years	16.9

See Appendix AQ for CalEEMod worksheets.

Combined Annual Emissions

Table 17 combines the amortized construction, operational, and mobile GHG emissions associated with the proposed project for comparison to the locally-applicable, project-specific efficiency threshold. As shown therein, the project would emit approximately 736 MT of CO₂e per year, or approximately 2.5 MT of CO₂ per service person, which would exceed the locally-applicable, project-specific threshold of 1.3 MT of CO₂e per year. Therefore, GHG emissions would be potentially significant.

Table 17 Combined Annual GHG Emissions

Emission Source	Annual Emissions (MT of CO ₂ e)
Construction	16.9
Operational	
Area	< 0.1
Energy	227.9
Solid Waste	57.5
Water	6.9
Mobile	
CO ₂ and CH ₄	417.6
N ₂ O	8.7
Total	735.5
Project-Specific Service Population¹	300
Project Emissions Per Service Person	2.5
Locally-Applicable, Project-Specific Threshold²	1.3
Threshold Exceeded?	Yes

See Appendix AQ for CalEEMod worksheets and N₂O emission calculations.

¹ See Table 15 for calculations.

² See Table 14 for calculations.

Mitigation Measures

GHG-1 GHG Emission Reduction Measures

The proposed project shall incorporate the following GHG emissions reduction measures (see Appendix AQ for GHG emission reduction calculations):

1. **Building Electrification.** The project shall not include natural gas connections (reduction of approximately 150 MT of CO₂e per year).
2. **On-Site Renewable Electricity.** The project shall supply 100 percent of its electricity from renewable energy resources. Options include opting into PG&E's Solar Choice or Regional Renewable Choice programs, installing an on-site rooftop solar photovoltaic system, or a combination of both (reduction of approximately 78 MT of CO₂e per year).
3. **Electric Vehicle Charging Stations.** The project shall install ten electric vehicle charging stations in the existing parking lot serving the proposed Moxy Hotel and/or the adjacent Aloft and/or Westin Hotels (reduction of approximately 11 MT of CO₂e per year per charging station [i.e., 1.06 MT of CO₂e per charging station]).

GHG-2 GHG Reduction Plan

In addition to implementing Mitigation Measure GHG-1, the project applicant shall prepare and implement a Greenhouse Gas Reduction Program (GGRP) that includes measures to reduce the remaining GHG emissions to 1.3 MT of CO₂e per service person (i.e., 390 MT of CO₂e per year with GHG-1 and GHG-2 combined) or less. Given that implementation of Mitigation Measure GHG-1 would reduce emissions by approximately 239 MT of CO₂e per year, remaining emissions would be approximately 497 MT of CO₂e per year, or 1.7 MT of CO₂e per service person per year. Therefore, the GGRP shall reduce emissions by approximately 107 MT of CO₂e per year, or 0.4 MT of CO₂e per service person per year. Potential options include, but would not be limited to (see Appendix AQ for GHG emission reduction calculations):⁵

- Implement a transportation demand program that reduces vehicle trips by 25 percent (reduction of approximately 106 MT of CO₂e per year). Program measures may include free transit passes for guests and employees, electric rideshare vehicles for guests, an electric-powered shuttle for guests, a bicycle sharing program, and construction of additional transit infrastructure at the project site.
- **Off-Site Renewable Electricity.** The project applicant shall convert all or a portion of the Aloft Hotel's electricity supply to 100 percent renewables by opting into PG&E's Solar Choice or Regional Renewable Choice programs, installing an on-site rooftop solar photovoltaic system, or a combination of both (reduction to be calculated at the time this option is selected).
- **Off-Site Renewable Electricity.** The project applicant shall convert all or a portion of the Westin Hotel's electricity supply to 100 percent renewables by opting into PG&E's Solar Choice or Regional Renewable Choice programs, installing an on-site rooftop solar photovoltaic system, or a combination of both (reduction to be calculated at the time this option is selected).
- Implement a zero waste program (reduction of approximately 58 MT of CO₂e per year).

⁵ The GHG emissions reduction estimates provided for each measure assume sole implementation of that measure. It should be noted that some measures would interact if implemented in tandem such that the combined GHG emissions reduction from those measures is less than the sum of the reductions estimated for each individual measure. For example, installation of low-flow fixtures would reduce indoor water usage and associated GHG emissions but would also reduce the potential GHG emission reduction achieved by using graywater for 25 percent of indoor water use.

- Use electric powered construction equipment (reduction of approximately 7 MT of CO₂e per year if air compressors, generators, forklifts, paving equipment, and welders)
- Install water-efficient fixtures, including low-flow bathroom faucets, kitchen faucets, toilets, and showers (reduction of approximately 1.3 MT of CO₂e per year).
- Use graywater for 100 percent of outdoor water use and 25 percent of indoor water use (reduction of approximately 1.9 MT of CO₂e per year).
- Use reclaimed water for 100 percent of outdoor water use (reduction of approximately 0.1 MT of CO₂e per year).
- Install water-efficient irrigation systems (reduction of less than 0.1 MT of CO₂e per year).
- Use electric-powered landscape equipment (reduction of less than 0.1 MT of CO₂e per year).
- Directly undertake or fund activities that reduce or sequester GHG emissions (“Direct Reduction Activities”) and retire the associated “GHG Mitigation Reduction Credits” in a quantity equal to the Incremental Construction GHG Emissions. A “GHG Mitigation Reduction Credit” must achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, enforceable, and in addition to any GHG emission reduction required by law or regulation or any other GHG emission reduction that otherwise would occur in accordance with the criteria set forth in the CARB’s most recent *Process for the Review and Approval of Compliance Offset Protocols in Support of the Cap-and-Trade Regulation* (2013). An “Approved Registry” is an accredited carbon registry that follows approved CARB Compliance Offset Protocols. At this time, Approved Registries include American Carbon Registry, Climate Action Reserve, and Verra (CARB 2018b). Credits from other sources will not be allowed unless they are shown to be validated by protocols and methods equivalent to or more stringent than the CARB standards. In the event that a project or program providing GHG Mitigation Reduction Credits to the project applicant loses its accreditation, the project applicant shall comply with the rules and procedures of retiring GHG Mitigation Reduction Credits specific to the registry involved and shall undertake additional direct investments to recoup the loss.
- Obtain and retire “Carbon Offsets.” “Carbon Offset” shall mean an instrument issued by an Approved Registry and shall represent the past reduction or sequestration of 1 MT of CO₂e achieved by a Direct Reduction Activity or any other GHG emission reduction project or activity that is not otherwise required (CEQA Guidelines Section 15126.4[c][3]). A “Carbon Offset” must achieve GHG emission reductions that are real, permanent, quantifiable, verifiable, enforceable, and in addition to any GHG emission reduction required by law or regulation or any other GHG emission reduction that otherwise would occur in accordance with the criteria set forth in the CARB’s most recent *Process for the Review and Approval of Compliance Offset Protocols in Support of the Cap-and-Trade Regulation* (2013). If the project applicant chooses to meet some of the GHG reduction requirements by purchasing offsets on an annual and permanent basis, the offsets shall be purchased according to the City of Millbrae’s preference, which is, in order of City preference: (1) within the City of Millbrae; (2) within the BAAQMD jurisdictional area; (3) within the State of California; then (4) elsewhere in the United States. In the event that a project or program providing offsets to the project applicant loses its accreditation, the project applicant shall comply with the rules and procedures of retiring offsets specific to the registry involved and shall purchase an equivalent number of credits to recoup the loss.

The GGRP shall be submitted to the City for review and approval prior to issuance of the first demolition or building permit issued for the project.

Significance After Mitigation

As shown in Table 18, implementation of Mitigation Measure GHG-1 would reduce the project's GHG emissions by approximately 239 MT of CO₂e per year, and implementation of Mitigation Measure GHG-2 would reduce GHG emissions by approximately 107 MT of CO₂e per year. Therefore, implementation of these mitigation measures would reduce project emissions to approximately 390 MT of CO₂e per year, or approximately 1.3 MT of CO₂e per service person per year, which would not exceed the locally-applicable, project-specific threshold of 1.3 MT of CO₂e per service person per year. Therefore, impacts would be less than significant with mitigation incorporated.

Table 18 Mitigated Combined Annual GHG Emissions

Emission Source	Annual Emissions (MT of CO ₂ e)
Total Unmitigated Project Emissions	735.5
Mitigation Measure GHG-1	
Building Electrification	(149.8)
On-site Renewable Electricity	(78.1)
Electric Vehicle Charging Stations	(10.6)
Mitigation Measure GHG-2	(107.0)
Total Mitigated Project Emissions	390.0
Project-Specific Service Population	300
Project Emissions Per Service Person	1.3
Locally-Applicable, Project-Specific Threshold Per Service Person	1.3
Threshold Exceeded?	No

See Appendix AQ for calculations of mitigation measures.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

In March 2018, the County of San Mateo accepted the finalized Sea Level Rise Vulnerability Assessment aimed at preparing and protecting its vulnerable communities. Included in the Assessment are actions and strategies to protect the county's infrastructure, buildings, and residents from sea-level rise. Since the proposed project would involve an infill development on an already developed parcel, it would be consistent with the Assessment, which identifies shoreline planning areas and operation landscape units around the edges of the San Francisco Bay, where erosion and storm surge control and restoration of natural coastal features can occur.

SB 375, signed in August 2008, requires the inclusion of Sustainable Communities' Strategies (SCS) in Regional Transportation Plans (RTP) to reduce GHG emissions. The Metropolitan Transportation Commission and ABAG adopted an SCS that meets the GHG reduction targets set forth by CARB. Plan Bay Area 2040 is a state-mandated, integrated long-range transportation, land-use, and housing plan that would support a growing economy, provide more housing and transportation

choices and reduce transportation-related pollution in the nine-county San Francisco Bay Area (ABAG 2017b). Plan Bay Area 2040 builds on earlier efforts to develop an efficient transportation network and grow in a financially and environmentally responsible way. Plan Bay Area 2040 would be updated every four years to reflect new priorities. The goals of Plan Bay Area 2040 related to GHG emissions include (ABAG 2017b):

1. **Climate Protection.** Reduce per-capita CO₂ emissions.
2. **Healthy and Safe Communities.** Reduce adverse health impacts.
3. **Open Space and Agricultural Preservation.** Direct development within urban footprint.
4. **Transportation.** Increase non-auto mode share.

The proposed project would be an infill development accessible for pedestrians, bicyclists, and public transit users. Increased alternative transportation would reduce vehicle trips and average vehicle miles travelled (VMT), thereby reducing mobile source GHG emissions and contributing to achieving the GHG emissions reduction goals set forth by AB 32, SB 32, and SB 375. The project site is approximately 0.5 mile from the Millbrae Station, which is served by BART and Caltrain. In addition, the project site is adjacent to the SFO airport and various shuttle services that provide transportation between the airport and various destinations. Therefore, given the viable public transit and alternative transportation options, future guests and employees would be able to use non-auto modes to access the project site, which would reduce per-capita CO₂ emissions and associated adverse health impacts related to mobile source air pollutant and GHG emissions.

The proposed project would not conflict with an applicable plan, policy, or regulation adopted to reduce the GHG emissions and would be consistent with the objectives of Plan Bay Area 2040, AB 32, SB 32, and SB 375. Therefore, the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Hazards and Hazardous Materials Setting

A Phase I Environmental Site Assessment (ESA) was prepared by ESI in December 2017 (ESI) (Appendix HAZ). As part of the 2017 Phase I ESA, Environmental Data Resources, Inc. (EDR) was contracted to provide a database search of public lists of sites that generate, store, treat, or dispose of hazardous materials or sites for which a release or incident has occurred for the project site and surrounding area. Federal, state, and county lists were reviewed as part of the research effort.

Adjacent Properties

Several adjacent properties were listed in the databases searched by EDR:

- **401 East Millbrae Avenue.** The site is listed as having one 550-gallon Underground Storage Tank (UST) containing diesel fuel onsite. No spills or violations were reported.
- **1849 Bayshore Highway.** The site is listed as a small quantity generator of hazardous waste and as having active UST(s) onsite. On June 7, 1994 a release of gasoline was recorded at the facility and soil contamination was discovered. The case is listed as "Completed - Case Closed" on September 28, 1994.
- **840 Cowan Road.** On August 19, 1997 a release was recorded at the facility and groundwater contamination was discovered. The case is listed as "Completed - Case Closed" on May 19, 2000.
- **890 Cowan Road.** The facility is listed as a small quantity generator of hazardous waste. No spills or violations were noted.
- **1 Adrian Court.** The facility is listed as a small quantity generator of hazardous waste. No spills or violations were noted.
- **400 Millbrae Avenue.** The facility noted as Millbrae City Wastewater Treatment Facility. The facility is noted as having been issued multiple Notices of Violation for fecal coliform and CBOD violations, non-reporting of ammonia, enterococcus, and non-monitoring of enterococcus, and various effluent violations. The facility is listed on the leaking underground storage database (LUST) database as having had several to the subsurface caused by underground storage tanks (USTs). The contaminants and effected media were not reported. All cases were subsequently closed
- **859 Cowan Road.** The facility is listed as a small quantity generator of hazardous waste. No spills or violations were noted.
- **1815 Bayshore Highway.** On September 18, 1998 a release of gasoline was reported onsite and potential groundwater contamination was discovered. On December 20, 2002 the case was listed as "Completed - Case Closed."

Project Site

Based on the EDR report and a review of available documents, the project site is listed in several databases, as noted below:

- **CHMIRS.** The California Hazardous Material Incident Report System database contains information on reported hazardous material incidents. The Date Completed is noted as July 27, 1988. No additional pertinent information was provided in the EDR database.

- **FINDS.** The Facility Index System/Facility registry System (FINDS) database contains both facility information and pointers to other sources that contain more detail. No other information was provided from this database.
- **San Mateo County BI.** The subject property is noted as having disposed of hazardous materials including off-specification, aged or surplus organics and aqueous solutions with total organic residues less than 10 percent. No spills or violations were reported.
- **HAZNET.** The subject property was identified as a small quantity generator of hazardous waste including chromium and benzene and as having disposed of hazardous materials including photochemicals/photoprocessing water. No spills or violations were reported.

Recognized Environmental Conditions (RECs) are defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property. The ESA concludes that, while the project site and adjacent properties have been listed in several databases, no RECs are present at the project site.

- a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Hotel uses typically do not involve the use or storage of large quantities of hazardous materials, other than those typically used for cleaning, maintenance, or landscaping. Therefore, operational impacts related to the transport, use, or disposal of hazardous materials would be less than significant.

Construction activities may also include the temporary transport, storage, use, or disposal of potentially hazardous materials, including fuels, lubricating fluids, cleaners, solvents, or contaminated soils. If spilled, these substances could pose a risk to the environment and to human health. However, the transport, storage, use, or disposal of hazardous materials is subject to various federal, state, and local regulations designed to reduce risks associated with hazardous materials, including potential risks associated with upset or accident conditions. Hazardous materials would be required to be transported under U.S. Department of Transportation (DOT) regulations (U.S. DOT Hazardous Materials Transport Act, 49 Code of Federal Regulations), which stipulate the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. In addition, the use, storage, and disposal of hazardous materials are regulated through the Resources Conservation and Recovery Act (RCRA). The California Department of Toxic Substances Control (DTSC) is responsible for implementing the RCRA program, as well as California's own hazardous waste laws. DTSC regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California. It does this primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (Title 22, CCR, Divisions 4 and 4.5). DTSC also oversees permitting, inspection, compliance, and corrective action programs to ensure that hazardous waste managers follow federal and State requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

Compliance with existing regulations would reduce the risk of potential release of hazardous materials during construction. Impacts would therefore be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

Great Joy Chinese School and Peninsula Chinese School, both located in the City of Burlingame, are the only schools within a 0.25-mile radius of the project site, located approximately 0.14 mile to the northeast and 0.17 mile to the east, respectively.

As described under criteria (a) and (b) above, project construction may involve the use, storage, or transport of hazardous material. However, the transport, use, storage, and disposal of such materials would be subject to applicable federal, state, and local regulations to minimize the release of hazardous materials into the environment. Therefore, there is no risk of exposure from contaminated soils or groundwater at the school during construction.

Project operation would not involve the handling of hazardous materials, substances, or wastes other than those typically used for household cleaning, maintenance, and landscaping. Handling of hazardous materials is subject to applicable federal, state, and local regulations to reduce emissions of hazardous materials into the environment. As discussed in the response to criteria (d) below, the project site does not contain hazardous materials contamination.

Given that the project would be required to comply with applicable regulations, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. *Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

The following databases were checked, pursuant to Government Code Section 95962.5, on August 30, 2019 for known hazardous materials contamination at the project site:

- **United States Environmental Protection Agency**
 - Comprehensive Environmental Response, Compensation, and Liability Information System/Superfund Enterprise Management System/Envirofacts database search
- **State Water Resources Control Board (SWRCB)**
 - GeoTracker search for leaking underground storage tanks and other cleanup sites
- **California Department of Toxic Substances Control**
 - EnviroStor search for hazardous facilities or known contamination sites
 - Cortese List of Hazardous Waste and Substances Sites
 - Cleanup Site and Hazardous Waste Facilities Database

The project site is not included on a list compiled pursuant to Section 65962.5 of the Government Code. Moreover, as described above, the Phase I found that no RECs are present at the project site (Appendix HAZ). Therefore, project construction and operation are not likely to expose construction

workers or nearby residents or workers to potentially unacceptable health risks from contaminated soil. No impact would occur.

NO IMPACT

e. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

The Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport, adopted in 2012, is the Airport Land Use Compatibility Plan (ALUCP) for SFO. As described in the Project Description, SFO is approximately 0.25 mile north of the project site. The project is in the SFO Airport Influence Area, and the western portion of the project site falls within Safety Compatibility Zone 3 of the ALUCP, Inner Turning Zone (ITZ). Land uses listed as incompatible with Zone 3 are: biosafety Level 3 and 4 facilities; children's schools; large child day care centers; hospitals, nursing homes; stadiums, arenas; hazardous uses other than biosafety Level 3 and 4 facilities; and critical public utilities.

The ALUCP contains several policies that are relevant to the proposed project, including the following:

AP-3 Maximum Compatible Building Height. In order to be deemed consistent with the [SFO] ALUCP, the maximum height of a new building must be the lower of (1) the height shown on the SFO critical aeronautical surface map (Exhibits IV-17 and IV-18), or (2) the maximum height determined not to be a "hazard to air navigation" by the FAA in an aeronautical study prepared pursuant to the filing of Form 7460-1. For the vast majority of parcels, the height limits established in local zoning ordinances are lower than the critical airspace surfaces. In those cases, the zoning district height regulations will control. Compliance with the zoning district height and the SFO critical aeronautical surfaces map, however, does not relieve the construction sponsor of the obligation to file a FAA Form 7460-1 Notice of Proposed Construction or Alteration, if required, and to comply with the determinations resulting from the FAA's aeronautical study. For a project to be consistent with this ALUCP, no local agency development permits shall be issued for any proposed structure that would penetrate the aeronautical surfaces shown on Exhibits IV-17 and IV-18 or the construction of which has not received a Determination of No Hazard from the FAA, or which would cause the FAA to increase the minimum visibility requirements for any instrument approach or departure procedure at the Airport.

AP-4 Other Flight Hazards are Incompatible. Proposed land uses with characteristics that may cause visual, electronic, or wildlife hazards, particularly bird strike hazards, to aircraft taking off or landing at the Airport or in flight are incompatible in Area B of the Airport Influence Area. They may be permitted only if the uses are consistent with the FAA rules and regulations. Proof of consistency with FAA rules and regulations and with any performance standards cited below must be provided to the Airport Land Use Commission (C/CAG Board) by the sponsor of the proposed land use action. Specific characteristics that may create hazards to aircraft in flight and which are incompatible include:

- Source of glare, such as highly reflective buildings or building features, or bright lights, including search lights or laser displays, which would interfere with the vision of pilots making approaches to the Airport.

- Distracting lights that would be mistaken by pilots on approach to the Airport for airport identification lighting, runway edge lighting, runway end identification lighting, or runway approach lighting.
- Sources of dust, smoke, or water vapor that may impair the vision of pilots making approaches to the Airport.
- Sources of electrical interference with aircraft or air traffic control communications or navigation equipment, including radar.
- Land uses that, as a regular byproduct of their operations, produce thermal plumes with the potential to rise high enough and at sufficient velocities to interfere with the control of aircraft in flight. Upward velocities of 4.3 meters (14.1 feet) per second at altitudes above 200 feet above the ground shall be considered as potentially interfering with the control of aircraft in flight.
- Any use that creates an increased attraction for wildlife, particularly large flocks of birds, that is inconsistent with FAA rules and regulations, including, but not limited to, FAA Order 5200.5A, Waste Disposal Sites On or Near Airports, FAA Advisory Circular 150/5200-33B, Hazardous Wildlife Attractants On or Near Airports, and any successor or replacement orders or advisory circulars. Exceptions to this policy are acceptable for wetlands or other environmental mitigation projects required by ordinance, statute, court order, or Record of Decision issued by a federal agency under the National Environmental Policy Act.

The proposed project would involve construction of a hotel and sign and would not include establishment of a land use that would be incompatible with the ALUCP. The new hotel would be six stories and have a height of 72 feet 3 inches, which would be below the ALUCP building heights, which range from 75 to 150 feet above average mean sea level at the project site (C/CAG of San Mateo County 2012). The height would be consistent with the height of the two other existing hotels at the project site, which are six and seven stories. The project would therefore not conflict with the ALUCP. Moreover, as described in Section 1, *Aesthetics* and Section 11, *Land Use and Planning*, the new digital billboard sign would not produce excessive light or glare that could that may cause visual, electronic, or wildlife hazards, particularly bird strike hazards, to aircraft taking off or landing at SFO or in flight are incompatible in Area B of the Airport Influence Area. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

f. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The project would involve the construction of a six-story hotel on developed private property. The project would not obstruct existing roadways or require the construction of new roadways or access points. Therefore, the proposed project would not block emergency response or evacuation routes or interfere with adopted emergency response and emergency evacuation plans. No impact would occur.

NO IMPACT

g. *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

The project site is in a developed, urbanized area surrounded by commercial development and roadways, and there are no adjacent wildlands or densely vegetated areas nearby which would represent a significant fire hazard. Additionally, the project is not located in a Fire Hazard Severity Zone or Very High Hazard Severity Zone for wildland fires (CAL FIRE 2007). Therefore, the project would not expose people or structures to significant hazards related to wildland fires and there would be no impacts.

NO IMPACT

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10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

The project would introduce heavy equipment to the site during construction and increase traffic to and from the site during operation. This increase in heavy construction equipment and operational traffic could result in an increase in fuel, oil, and lubricants in the stormwater runoff due to leaks or accidental releases.

The Clean Water Act and other regulations govern water quality of stormwater runoff. As part of Section 402 of the Clean Water Act, the U.S. EPA has established regulations under the NPDES program to control both construction and operation (occupancy) stormwater discharges. In California, the SWRCB administers the NPDES permitting program and is responsible for developing permitting requirements. Under the conditions of the County's NPDES Municipal Regional Stormwater Permit (Order No. R2-2015-0049), the City of Millbrae must implement a stormwater management plan to control polluted discharges to the stormwater drainage system (NPDES 2015). The City of Millbrae is a participating agency in the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP). The City must meet the provisions of the Municipal Regional Stormwater Permit by ensuring that new development and redevelopment mitigate water quality impacts to stormwater runoff during the construction and operation of projects. The Program's Permit Provision C.3 contains requirements for controlling the potential impacts of land development on stormwater quality and flow and includes numerous BMPs that must be incorporated into construction activities, such as the stabilization of loose soils and minimization of runoff. Furthermore, projects that create or replace 10,000 square feet or more of impervious surface must also include appropriate site design measures, pollutant source controls, and treatment control measures. The project would collectively create and replace more than 10,000 square feet of impervious surfaces and would therefore be subject to these requirements.

Additionally, the project would be required to comply with relevant sections of the MMC, including Chapters 8.70 and 9.45. Chapter 8.70, *Storm Water Management and Discharge Control*, requires the elimination of non-storm water discharges to the municipal storm sewer and stipulates that pollutants in storm water discharges must be reduced to the maximum extent possible. Several stormwater pollution prevention measures are recommended by the MMC. These may include but are not limited to minimization of impervious surfaces; regular cleaning of parking lot surfaces; utilization of filter materials at storm drains; and adherence to any additional BMPs that are adopted by the City. Chapter 9.45, *Grading*, must also be complied with to minimize potential impacts to water quality. This requires applicants to obtain a grading permit and prepare an interim (construction) erosion control plan as well as a final (operational) erosion control plan (City of Millbrae 2019a).

The project would involve the construction of a hotel on land that is currently occupied partially by non-paved landscaping and a paved parking lot. The proposed building would create approximately 8,300 square feet of impervious surface by covering a portion of the site that is landscaped and replace approximately 2,750 square feet of impervious surface occupied by the surface parking lot, for a total of approximately 11,050 square feet of impervious surface. In addition, the project would include a landscaped courtyard of approximately 8,835 square feet that would contain mostly pervious surfaces. The courtyard would be located in between the existing Aloft Hotel and the proposed hotel.

The project site sits atop the southern portion of the Westside groundwater basin and is near a contour line for a depth to groundwater of 140 feet below ground surface (SFPUC 2012). However, according to information provided by the SWRCB database Geotracker for remediation projects

near the project site, perched groundwater is present in the vicinity at depths ranging from approximately 4 to 11 feet below the surface (SWRCB 2019). The maximum depth of excavation is estimated to be 5 feet below the ground surface. Therefore, the project may require dewatering if groundwater is exposed during construction activities. A Waste Discharge Requirement (WDR) permit would be required from the San Francisco Bay RWQCB for construction dewatering activities and the WDR permit would require testing to ensure that discharged water did not pose a risk to water quality.

Therefore, with adherence to requirements listed above, the project would not violate water quality standards, waste discharge requirements, or degrade surface or groundwater quality. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The project sits atop the southern portion of Westside groundwater basin. The Westside Basin underlies both northern San Mateo County as well as the City and County of San Francisco. The basin is jointly managed by City of Daly City, City of San Bruno, City of Burlingame, Town of Colma, City of South San Francisco, City of Millbrae, California Water Services Company, and SFPUC. It is not currently in a state of overdraft and management is guided by the South Westside Basin Groundwater Management Plan (SFPUC 2012).

As discussed in Section 17, *Utilities and Service Systems*, water would be supplied to the proposed project by the City of Millbrae via municipal water system of the SFPUC. Millbrae purchases all of its water supply from the SFPUC, which obtains water from surface sources in the Sierra Nevada Mountains. The proposed project would not require the withdrawal of groundwater or lead to overdraft of the Westside basin. The proposed project would not include installation of new groundwater wells or require the use of groundwater from existing wells.

Groundwater recharge rates vary considerably across the South Westside Basin. Estimates of recharge for the South Westside Basin were recently modeled. The recharge estimates show that groundwater recharge is highest in the northwestern portions of the basin, corresponding to areas of sandy soils, and in areas with significant unpaved, irrigated land. Recharge is lowest along the margins of San Francisco Bay, corresponding to areas with Bay Muds, and along the steep slopes of San Bruno Mountain. According to the recharge modeling, the project site is in a location of low annual recharge, with an estimated recharge rate of 0-4 inches per year (SFPUC 2012). The proposed project would result in an increase in impervious area at the project site. However, the project site is located on a site with substantial existing development and impervious surface cover. The relatively small increase impervious cover that would occur as a result of this project would not significantly reduce overall rates of groundwater recharge in the South Westside Basin. In addition, this project must comply with NPDES requirements as described in criterion (a).

Therefore, the project would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Impacts related to groundwater would be less than significant.

LESS THAN SIGNIFICANT IMPACT

- c.(i) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?*
- c.(ii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
- c.(iii) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*
- c.(iv) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?*

The project site is substantially developed and includes existing hotels, parking lots and roadways. Two creeks, El Portal and Highline, are close to the project site. El Portal Canal runs immediately adjacent to the southern boundary of the project site, approximately 170 feet from where construction activities would occur. Highline Creek is situated north of the project site between South McDonnell Road and SFO, approximately 350 feet away. Neither creek intersects with the project site and they would not be altered or affected by the proposed project (SMC 2015).

The project would involve the construction of a hotel on land that is currently occupied partially by non-paved landscaping and a paved parking lot. The project would create approximately 11,050 square feet of new impervious surface. In addition, the project would include a landscaped courtyard of approximately 8,835 square feet that would contain mostly pervious surfaces, reducing some runoff and potential for polluted water to enter storm drains. Although the proposed project would result in a net increase in impervious surface cover, the new impervious surface represents a small portion of the overall project site which already has substantial impervious surface cover. Therefore, the addition impervious surface cover associated with this project would not substantially alter the drainage characteristics of the project site.

The project site is generally flat and is already graded, with little topographic variation. The addition of the proposed project to the site would therefore not result in substantial erosion or siltation. Given that the site is already developed with impervious surface, the proposed project would also not substantially increase the rate of surface runoff in a manner that would result in flooding on- or off site or impede or redirect flood flows.

The City of Millbrae manages a stormwater drainage system that consists of a network of storm drains, open creeks, ditches and three pump stations (City of Millbrae 2018). This system carries storm runoff through the City before it reaches the San Francisco Bay on the City's eastern edge. El Portal Canal runs along the southern boundary of the project area and is part of the City's stormwater conveyance system. Stormwater from the project site would flow into the El Portal Canal before entering the Bay. As discussed in criterion (a), the project would be required to comply with NPDES requirements and elements of the MMC relevant to stormwater runoff. Upon compliance with these regulations, there would not be a substantial increase in site stormwater runoff compared to existing conditions. Therefore, the proposed project would therefore not create

or contribute to runoff that would exceed the capacity of the existing stormwater conveyance infrastructure or otherwise result in flooding on or near the project site.

The proposed project would not introduce new surface water discharges, substantially increase runoff volumes, result in substantial erosion or siltation, or result in flooding on- or off-site. The project would also not alter the existing drainage pattern of the site. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The site is not located in a zone of tsunami inundation and potential impact to the city from seiches and mudflow/debris flow is minimal given its location and surrounding geography (DOC 2009). The project site is flat and surrounded by existing developments and roadways away from crests and steep ridges. Moreover, as discussed in criterion (a), the project would be required to comply with NPDES requirements and portions of the MMC relevant to water quality.

The project site is located approximately 200 feet from the shoreline of the San Francisco Bay and approximately 8 miles from the Pacific Ocean. The project site is located in a Special Flood Hazard Area as designated by FEMA (FEMA 2019). Flood hazard zones are areas subject to flood hazards that are identified on an official Flood Insurance Rate Map (FIRM) issued by the Federal Emergency Management Agency (FEMA). Flooding can be earthquake induced or the result of intense rainfall. Areas within a 100-year floodplain have a 1 percent probability of flooding in a given year. According to FIRM Map. No. 06081C0132E, there are two areas designated as Zone A (i.e., subject to inundation in the event of a 100-year flood) near the project area. These areas coincide with the locations of the Highline Canal and the El Portal Canal, respectively. The FEMA map indicates that the 100-year flood would be fully contained within the channels of these canals. Therefore, the project would not be restricted or be subject to FEMA regulations, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The proposed project would be subject to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta (SWRCB 2018). The State Water Board is responsible for adopting and updating the Bay-Delta Plan, which establishes water quality control measures and flow requirements needed to provide reasonable protection of beneficial uses in the watershed. As discussed in criterion (a), the project would be required to comply with NPDES requirements and portions of the MMC relevant to water quality. The project would therefore not conflict with or obstruct implementation of the Bay-Delta Plan (SWRCB 2018).

As discussed in criterion (b), the southern portion of Westside groundwater basin underlies the project site. Management of the basin is guided by the South Westside Basin Groundwater Management Plan. The project would not rely on groundwater or degrade the quality of groundwater. The proposed project would not conflict with or obstruct implementation of the South Westside Basin Groundwater Management Plan.

Therefore, the proposed would have no impact with respect to implementation of a water quality control plan or sustainable groundwater management plan.

NO IMPACT

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Would the project physically divide an established community?

The project would involve the construction of a hotel on two contiguous existing parcels in a fully urbanized area of Millbrae. The project would not separate connected neighborhoods or land uses from each other. No new roads, linear infrastructure, or other development features are proposed that would divide an established community or limit movement, travel, or social interaction between established land uses. No impacts would occur.

NO IMPACT

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

As described in the Project Description, the project site is in the General Commercial Land Use Designation which, according to the Millbrae General Plan, “includes the full range of retail commercial uses.” The proposed project would be consistent with the intended uses for this land use designation, similar to the existing commercial uses on the site. Land Use Goal LU4.1 calls for the City to “provide sufficient land for commercial and industrial uses to allow for development that provides basic goods and services to Millbrae residents and surrounding regional economic activities such as the San Francisco International Airport.” The proposed project would be consistent with this goal; it would provide additional hotel space primarily for people traveling through SFO in a location near various transit options.

The project site is in the Planned Development (PD) zoning district. In order to be approved, the proposed project would require a modification to an approved Specific Development Plan, Design Review, Master Sign Program and Parking Variance at the site, which would be granted by the Millbrae Planning Commission. According to Millbrae Municipal Code Section 10.05.1550.B, the Planning Commission would consider the site and landscape plans to ensure the proposal is “in keeping with the character of the neighborhood,” and “not...detrimental to the orderly, harmonious and safe development of the city.” In addition, to approve the project, the Planning Commission would be required to make the following findings:

1. That the proposed development conforms to the overall intent of the development plan, and will produce an environment of stable, desirable character and high-quality development with uses that contribute to the environmental quality of the stated area; and
2. That the proposed development provides overall standards of population densities, of open space, of circulation and off-street parking and other general conditions of use at least equivalent to those required by the development plan or by the terms of this chapter in districts where similar uses are permitted; and
3. That the proposed development plan shall represent a development of sufficient harmony within itself and with adjacent areas to justify any exceptions to the normal regulations within this chapter; and
4. That fire protection is adequate; and
5. That drainage is adequate; and
6. That capacity of utilities and infrastructure, including size and location of streets and sidewalks, is adequate or will be installed/improved to an adequate level prior to the granting of a certificate of occupancy; and
7. That recreation is adequately provided for in the area or adequate in-lieu fees are paid.

To approve the new signage, the project would require an amendment to the Municipal Code to allow a general advertising billboard on private property. In addition, the Planning Commission would be required to find that the modification to the Master Sign Program is consistent with the requirements of the Chapter 10.10, *Sign Regulations* of the MMC, and that the “location, number, size, scale, design, lighting, materials harmonize with their surroundings and are compatible with the architectural style of the building” (Section 10.10.150).

An amendment to the MMC to allow the proposed sign and the above required findings would ensure that the project, if approved, would be consistent with applicable land use plans, policies, and regulations, including the General Plan and MMC. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

b. *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

The project site and surrounding properties are part of an urbanized area with no current oil or gas extraction. The Millbrae General Plan does not contain any mineral resource land uses. Therefore, the project would not result in the loss of availability of a known mineral resource or mineral resource recovery site.

NO IMPACT

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13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

Noise is defined as unwanted sound that disturbs human activity. Environmental noise levels typically fluctuate over time, and different types of noise descriptors account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Because of the logarithmic scale of the decibel unit, sound levels cannot be added or subtracted arithmetically. If a sound's physical intensity is doubled, the sound level increases by 3 dBA, regardless of the initial sound level. For example, 60 dBA plus 60 dBA equals 63 dBA. Where ambient noise levels are high in comparison to a new noise source, the change in noise level would be less than 3 dBA. For example, when 70 dBA ambient noise levels are combined with a 60 dBA noise source the resulting noise level equals 70.4 dBA.

The period in which noise occurs is important since nighttime noise tends to be more disturbing than daytime noise. Community noise is usually measured using Day-Night Average Level (L_{dn}), which is the 24-hour average noise level with a 10-dBA penalty for noise occurring during nighttime (10:00 p.m. to 7:00 a.m.) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour

average noise level with a 5 dBA penalty for noise occurring from 7:00 p.m. to 10:00 p.m. and a 10 dBA penalty for noise occurring from 10:00 p.m. to 7:00 a.m. Noise levels described by L_{dn} and CNEL typically do not differ by more than 1 dBA. In practice, CNEL and L_{dn} are often used interchangeably.

The relationship between peak hourly L_{eq} values and associated L_{dn} values depends on the distribution of traffic over the entire day. There is no precise way to convert a peak hourly L_{eq} to L_{dn} . However, in urban areas near heavy traffic, such as the project site, the peak hourly L_{eq} is typically 2-4 dBA lower than the daily L_{dn} .

Noise experienced at any receptor can be attenuated by distance or the presence of noise barriers or intervening terrain. Sound from a single source (i.e., a point source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (or decreases with distance) at a rate of 6 dBA for each doubling of distance for point sources. Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance, while noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance. A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receiver, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (e.g., hills and dense woods) and human-made features (e.g., buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receiver specifically to reduce noise. A barrier that breaks the line of sight between a source and a receiver will typically result in at least 5 dBA of noise reduction.

Federal Highway Administration [FHWA] 2011). Structures can substantially reduce exposure to noise as well. The FHWA's guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows. Standard construction techniques for wood-frame and concrete-podium construction buildings required under the California Building Code typically achieve a minimum 25-dBA and 30 dBA reduction from exterior sources at interior locations, respectively when the windows are in a closed position.

Some land uses are more sensitive to ambient noise levels than other uses due to the amount of noise exposure and the types of activities involved. For example, residences, motels, hotels, schools, libraries, churches, nursing homes, auditoriums, museums, cultural facilities, parks, and outdoor recreation areas are more sensitive to noise than commercial and industrial land uses.

Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas sound is simply carried through the air. Thus, vibration is generally felt rather than heard. Vibrating objects in contact with the ground radiate energy through that medium. If a vibrating object is massive enough and/or close enough to the observer, its vibrations are perceptible. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. The ground motion caused by vibration is measured in vibration decibels (VdB). The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources in buildings, such as the operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, and 100 VdB, the general threshold where minor damage can occur in fragile buildings.

Regulatory Setting

The City of Millbrae's General Plan includes goals and policies related to noise. This element establishes land use compatibility categories for community noise exposure (Table 19, below). For residential uses, hotels, and motels, the City identifies noise levels up to 60 dBA L_{dn} as normally acceptable and noise levels between 60 and 75 dBA L_{dn} as conditionally acceptable (City of Millbrae 1998). In addition, the General Plan includes California's interior noise standard of 45 dBA L_{dn} for interior habitable rooms of hotels.

Together, the Millbrae General Plan and the MMC regulate noise within the City. Noise related policies from the General Plan and MMC that are relevant to this project are listed below:

- General Plan Noise (NS) Element, NS1.4: Construction Noise. Regulate construction activity to reduce noise between 7:00 p.m. and 7:00 a.m.
- **General Plan Noise (NS) Element, NS2.4:** Residential and Other Noise Sensitive Uses in Commercial or Industrial Areas. This policy states that noise sensitive uses shall not be subject to noise exceeding 55 dBA L_{eq} from 7 a.m. to 10 p.m. and 45 dBA L_{eq} from 10 p.m. to 7 a.m. Allowable levels shall be raised to the ambient noise levels where the ambient levels exceed the allowable levels.
- **MMC Chapter 6.25, Section 6-5.05.F.9.b:** Emanation of noise or vibrations on a continuous and regular basis of such a loud, unusual, unnecessary, penetrating, lengthy or untimely nature as to unreasonably disturb, annoy, injure or interfere with or endanger the comfort, repose, health, peace, safety or welfare of users of neighboring property.
- **MMC Chapter 9.05, Section 1.8.4.5:** Hours of Construction. Construction, alteration, or repair work shall occur only during the following hours: Monday through Friday 7:30 a.m. to 7:00 p.m., Saturday 8:00 a.m. to 6:00 p.m., and Sunday and Holidays 9:00 a.m. to 6:00 p.m. Any work outside these hours is prohibited without prior written permission of the Administrative Authority.

Although the City does not provide quantitative standards for construction noise, for purposes of this analysis, the FTA Transit Noise and Vibration Impact Assessment (FTA 2018) criteria will be used. The FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction. For noise-sensitive receivers, the daytime noise threshold is 80 dBA L_{eq} for an 8-hour period.

Beyond these regulations, the City of Millbrae does not have specific and/or quantitative regulatory standards for construction or operational vibration sources (City of Millbrae 2015). Therefore, this analysis uses the Federal Transit Administration's (FTA) vibration impact thresholds to determine whether groundborne vibration would be "excessive." A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels, where many people find transit vibration at this level annoying. Consequently, the FTA recommends a 72 VdB threshold for frequent events at residences and buildings where people normally sleep. However, construction equipment would be mobile throughout the construction day and not in operation continuously; therefore, construction vibration vents would not be considered frequent, and would instead the infrequent guidelines from the FTA would apply. The FTA threshold is 85 VdB for human response to vibration when exposed to an infrequent number of events during the daytime and 75 VdB during the nighttime hours.

The FTA does not consider most commercial and industrial uses to be vibration-sensitive (except for those that depend on quiet as an important part of operations, such as sound recording studios)

City of Millbrae
401 East Millbrae Avenue Project (Moxy Hotel)

and therefore does not recommend thresholds for groundborne vibration impacts to such uses. In terms of groundborne vibration impacts on structures, the FTA states that groundborne vibration levels in excess of 100 VdB would damage fragile buildings and levels in excess of 95 VdB would damage extremely fragile historic buildings (FTA 2006).

Table 19 City of Millbrae Land Use Compatibility for Community Noise Environments

Land Use Category	Noise Exposure Levels (L _{dn} or CNEL, dBA)		
	Normally Acceptable	Conditionally Acceptable	Unacceptable
Residential, Hotels, and Motels	50-60	60-75	75-85
Outdoor Sports and Recreation, Neighborhood Parks and Playgrounds	50-65	65-80	80-85
Schools, Libraries, Museums, Hospitals, Personal Care, Meeting Halls, Churches	50-60	60-75	75-85
Office Buildings, Business Commercial, and Professional	50-60	60-80	80-85
Auditorium, Concert Halls, Amphitheaters	NA	50-70	70-85
Industrial, Manufacturing, Utilities, and Agriculture	50-70	70-85	NA

Source: City of Millbrae General Plan 1998

Project Site Noise Environment

Like many urban areas, transportation-related noise, including car and truck traffic, trains, and air traffic dominates Millbrae's noise environment. Highway 101 is the largest source of traffic noise in Millbrae, with other highways and major roadways contributing as well. These include El Camino Real, Interstate 280 (I-280), Millbrae Avenue, Hillcrest Boulevard and Broadway, among others. Private cars, trucks, buses, and other types of vehicles generate noise along all of these roadways. Caltrain and BART also run through Millbrae and contribute to the noise environment of the city. Temporary and periodic noise in the project vicinity is also generated air traffic at SFO.

The project site is located in an area with substantial noise from existing sources. The site is bounded by the Old Bayshore Highway to the north, Millbrae Avenue to the west and Highway 101 to the south. SFO is located approximately 0.25 mile north.

a. *Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Construction Noise

Project construction would generate temporary noise that would be audible at nearby sensitive receptors, such as the Aloft Hotel, located approximately 45 feet to the west, and the Westin Hotel, located approximately 113 feet to the east of the project site along Millbrae Avenue. Noise associated with construction is a function of the type of construction equipment, the location and

sensitivity of nearby land uses, and the timing and duration of the construction activities. Project construction would occur over approximately 16 months.

Project construction would occur nearest to the Aloft Hotel, located to the west and north the project site. Over the course of a typical construction day, construction equipment would be located as close as 45 feet to the exterior of the hotel and an outdoor patio area of the hotel, but would typically be located at an average distance further away due to the nature of construction (i.e., the construction equipment would move across the project site throughout a typical construction day). Therefore, it is conservatively assumed that over the course of a typical construction day the construction equipment would operate 100 feet from the nearest residences. Table 20 provides estimates of construction noise at the Aloft Hotel for each phase of project construction. Construction noise was estimated using the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM). Noise was modeled based on a project-specific construction equipment list provided by the project applicant. The project specific equipment list and RCNM outputs are provided in Appendix NOI.

Table 20 Estimated Maximum Construction Noise – dBA Leq

Construction Phase	Equipment	Estimated Noise at 100 feet (dBA Leq [8-hour])
Demolition	Excavator, tractor/backhoe/loader, dozer	75
Site preparation	Grader, tractor/backhoe/loader	76
Building construction	Crane, forklift (2), manlift	70

See Appendix NOI for RCNM modeling results.

As shown in Table 20 construction noise would generate up to 76 dBA Leq (8-hour) at a distance of 100 feet during construction, which would not exceed the FTA daytime threshold of 80 dBA Leq (8-hour).

In addition, project construction would conform to the MMC-allowed construction noise hours of 7:30 a.m. and 7 p.m. on weekdays, between 8 a.m. and 6 p.m. Saturday and between 9 a.m. and 6 p.m. on Sundays and holidays.

Operational Noise

Primary project operational noise would occur from heating, ventilation, and air conditioning (HVAC) equipment, delivery and trash trucks, and project-generated traffic.

Heating, Ventilation, and Air Conditioning (HVAC) Equipment

The primary stationary noise generator from the project would be heating, ventilation, and air conditioning (HVAC) units. Specific planning data for the future HVAC systems are not available at this stage of project design; however, analysis using a typical commercial condenser provides a reasonable basis for analysis. modeling assumed the use of Carrier 16-ton packaged HVAC units (50PG03-16) with a manufacturer's Sound Power Rating of 84.0 dBA SWL (see Appendix NOI for HVAC specifications). A Carrier 50PG03-16 split system with a sound power level of 84.0 dBA would generate a noise level of approximately 69 dBA at a distance of 7 feet.

The project's HVAC units would be located on the rooftop of. A general rule of thumb is that a building would need one ton of HVAC per 600 square feet of building space. Each HVAC unit identified above would be 16 tons. Therefore, with a building area of 76,443 sf, the project would require 127 tons of HVAC, or approximately 8 HVAC units. This analysis conservative assumes that HVAC units would operate continuously and would not include any type of screening.

The rooftop units would be located at an approximate height of 75 feet (72 foot 3 inch roof height and 3 foot height for HVAC unit) and at least 45 feet horizontally from the nearest noise-sensitive uses (rooms at the Aloft Hotel). Eight HVAC units generating noise at a distance of 120 feet would generate a noise level of 44 dBA L_{eq} . Therefore, noise levels would not exceed City General Plan operational noise standards of 45 dBA L_{eq} during the nighttime hours. In addition, the area is subject to much higher ambient noise levels, as demonstrated in the 70 dBA noise contour that the site falls under from Highway 101 (City of Millbrae 2017); HVAC noise occurring within this ambient noise environment would be negligible. Operational noise impacts from the HVAC units would be less than significant.

Delivery and Trash Trucks

Noise from mail delivery trucks and trash hauling trucks would generate periodic noise near the project site. Delivery and trash hauling trucks would access the project site via Millbrae Avenue. Both delivery and trash hauling trucks would periodically idle in the hotel parking lot while performing duties. The average noise level for a single idling truck is estimated at 80 dBA L_{eq} at a distance of 10 feet (BridgeNet 2008). Assuming a distance of 45 feet to the nearest noise-sensitive receiver (Aloft Hotel), this would equal a noise level of approximately 50 dBA.

These noise levels may exceed the City's General Plan operational noise standards of 55 dBA L_{eq} and 45 dBA L_{eq} during the nighttime hours. However, the area is subject to much higher ambient noise levels, as demonstrated in the 70 dBA noise contour that the site falls under from Highway 101 (City of Millbrae 2017). The General Plan states to use the ambient noise level as the standard if it exceeds the general standards. Given that the noise level from delivery and trash trucks would not exceed 70 dBA and would therefore not exceed the existing ambient noise levels, impacts would be less than significant.

Transportation

As noted in Section 16, *Transportation*, the project would increase vehicle traffic in the project vicinity above existing conditions. Existing traffic volumes on Millbrae Avenue are approximately 22,040 vehicles per day (Appendix TRA).⁶ Under 2040 plus Project conditions, daily traffic volumes would increase to approximately 31,880 vehicles per day, which would represent an approximately 45 percent increase in daily traffic volumes (Appendix TRA).⁷ Typically, for a project to result in a barely perceptible increase in roadway noise, it must generate a 3-dBA increase in ambient noise levels. A doubling of trips would result in an increase of 3-dBA to the existing ambient noise environment (FTA 2018). As the project would only result in a traffic increase of 45 percent the increased traffic associated with the project would not result in an audible addition of traffic noise, and the project would have a less than significant impact from increasing long-term traffic noise.

⁶ Existing daily traffic volumes were calculated by multiplying AM peak hour traffic volumes on Millbrae Avenue of 2,204 vehicles by 10 (Precision Traffic and Safety Systems 2019).

⁷ Daily traffic volumes under 2040 plus Project conditions were calculated by multiplying PM peak hour traffic volumes on Millbrae Avenue of 3,188 vehicles by 10 (Precision Traffic and Safety Systems 2019).

Land Use Compatibility

Analysis of impacts of the environment on a project is not required for CEQA compliance (*Ballona Wetlands Land Trust et al. v. City of Los Angeles*). Therefore, noise exposure to new noise-sensitive land uses has been analyzed for informational purposes only. For hotels, the City identifies noise levels up to 60 dBA L_{dn} as normally acceptable and noise levels between 60 and 75 dBA L_{dn} as conditionally acceptable, with a 45 dBA L_{dn} standard for interior noise. According to the Existing Conditions Report for the City's General Plan Update (City of Millbrae 2017), the project is in Highway 101's 70 dBA noise contour. The project would have exterior use areas on the northern portion of the project site; however, noise to these areas would be heavily attenuated in all directions from highway noise due to shielding from the proposed project as well as the existing Aloft Hotel (i.e., the areas would have no direct line of sight with the highway). This attenuation would be substantial and exterior use areas would not be subject to noise levels in excess of 60 dBA L_{dn} from highway noise. For interior noise levels, standard construction techniques for concrete-podium construction buildings required under the California Building Code typically achieve a minimum 30 dBA reduction from exterior sources at interior locations when the windows are in a closed position. The hotel would be concrete-podium construction. Therefore, noise levels of 70 dBA from Highway 101 would be attenuated by approximately 30 dBA, which would be below the 45 dBA L_{dn} standard for interior noise. Therefore, the project would be compatible with the exterior and interior land use compatibility standards.

LESS THAN SIGNIFICANT IMPACT

b. *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Project operation would not be a source of vibration. However, project construction would result in some vibration that may be felt on properties in the project vicinity. Per MMC requirements, timing restrictions on construction activity would avoid vibration during normal sleeping hours.

As shown in Table 21 below, construction equipment would generate vibration of up to 79 VdB at the nearest sensitive receiver, the Aloft Hotel. Thus, vibration from project construction would not exceed the FTA threshold of 85 VdB for human response to vibration when exposed to an infrequent number of events. In addition, the project would comply with the MMC and no construction would occur during evening or nighttime hours. Therefore, the project would not exceed the FTA criteria of 75 VdB for occasional events where people sleep during normal sleep hours. Impacts from vibration to human receivers would be less than significant.

Table 21 Vibration Levels for Construction Equipment

Equipment	Approximate L_v at 25 feet (reference distance)	Approximate VdB at 45 feet
Air Compressor	81	75
Backhoe	80	74
Crane, Mobile	83	77
Dozer	85	79
Saw	70	84

Table 21 shows that vibration levels during project construction would reach a maximum of 79 VdB, which would not exceed the FTA threshold of 100 VdB for minor damage to fragile buildings (FTA 2018). Impacts from vibration to buildings would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

There are no private airstrips near the project site. The nearest airport is SFO, approximately 0.25 mile north of the project site. The project site is located within the SFO Influence Area. According to Figure D-3 of the San Francisco International Airport Land Use Compatibility Plan, the project site is located between the 65 and 70 dBA noise level contours for the airport (San Francisco Airport Commission 2019). Airport noise levels of 70 dBA is considered a conditionally acceptable level for hotels according the Table 7-4 of the Millbrae General Plan (City of Millbrae 1998). As noted under *Setting* above, modern building construction for concrete-podium buildings in California typically provides a reduction of exterior-to-interior noise levels of 30 dBA with closed windows. Therefore, interior noise levels at the proposed project would be below the City General Plan's 45 dBA L_{dn} interior noise threshold. Therefore, the project would not expose construction workers or hotel guests at the site to excessive noise from airports and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a. <i>Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</i>				

The project would not increase residents into the City and therefore would not directly induce population growth to the City. The proposed project would generate an estimated total 44 new jobs, including part-time jobs, that could indirectly generate population growth and a greater need for employee housing. This incremental increase in employment opportunities would not substantially induce population growth through the provision of new jobs. Additionally, it is anticipated that employees of the hotel would be primarily drawn from existing residents or from nearby communities. No new roads or infrastructure are proposed. Therefore, the project would not result in direct or substantial indirect population growth within the City of Millbrae or the region. The impact would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The project site currently contains a portion of a parking lot for the two adjacent hotels. There are no existing housing units on the project site or people residing on the project site in temporary housing. Therefore, the project would not displace existing housing units or people. No impact would occur.

NO IMPACT

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15 Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1 Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2 Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3 Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4 Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5 Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a.1. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?*

The Central County Fire Department (CCFD) provides all-risk fire protection to the City of Millbrae in the form of fire suppression, search and rescue, emergency medical services, operational training, fire prevention and investigation, community education, and other services based on community needs. CCFD has department performance measures that require the first unit to arrive at fire suppression and medical incidents in 6 minutes and 59 seconds or less (City of Millbrae 2015).

CCFD Fire Station 37 is closest to the project site at 511 Magnolia Ave, approximately 1 mile west (CCFD 2017). The site is in the existing service area of the CCFD. Moreover, the project would involve a transient occupancy use and on-site construction would be required to comply with applicable Fire Code requirements. The project would not create excessive demand for emergency services or introduce development to areas outside of normal service range that would necessitate new fire protection facilities, as the existing hotels at this project site are served by CCFD. Upon project review and approval by the CCFD and compliance with the California Fire Code, the project

would not impact fire protection services and would not result in the need for construction or expansion of fire protection facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

The San Mateo County Sheriff's Office Millbrae Police Bureau (MPB) provides police protection in the City of Millbrae. As of 2014, the MPB handles an average of 14,000 calls for service per year with an average response time for Priority 1 calls (life-threatening situations) of under 4 minutes (City of Millbrae 2015).

The project site is serviced by the MPB. The closest police station is at 581 Magnolia Avenue, approximately 1 mile west of the project site. The project would not increase MPB service population (refer to Section 13, *Population and Housing*), create excessive demand for police services, or introduce development to areas outside of normal service range that would necessitate new police protection facilities. The existing hotels are served by the MPB, and the proposed project would not create the need for new or expanded police protection facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

The project site is within the Millbrae School District. However, as described in Section 14, *Population and Housing*, the project would not substantially increase permanent residents in Millbrae. Therefore, the project would not significantly impact school enrollment in the Millbrae School District and would not result in the need for new or expanded school facilities. There would be no impact.

NO IMPACT

a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, public facilities, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Refer to Section 16, *Recreation*.

LESS THAN SIGNIFICANT IMPACT

a.5. Would the project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, or the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

As discussed in Section 14, *Population and Housing*, the project would not result in substantial population growth. Construction of other new facilities, such as libraries, would therefore not be required, and no impact would occur.

NO IMPACT

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16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

The parks closest to project site are Bayfront Park to the north and Manor Park to the west, approximately 0.2 mile and 0.4 mile from the project site, respectively. Bayfront Park is approximately 4 acres in size and located on the San Francisco Bay Shoreline with grassy areas, a paved path and benches (SMCCVB 2019). Manor Park is approximately 32 acres in size and is located along Highway 101, opposite SFO, and includes paved paths, a basketball court, playground and an open space area (City of Millbrae 2019b). As described in Section 13, *Population and Housing*, the project would not result in a substantial increase in population in Millbrae. Hotel guests could potentially use neighborhood or regional parks and recreational facilities in the area. However, this use would be temporary and intermittent and would not result in a substantial increase in demand or significant deterioration of recreation facilities.

In addition, the project would not involve the construction of recreational facilities, other than a 745 square-foot landscaped roof deck that would serve guests of the project.

The project would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. Therefore, the project would have a less than significant impact on recreational facilities.

LESS THAN SIGNIFICANT IMPACT

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17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting

The following analysis is based primarily on the Transportation Study for the Millbrae Hotel Moxy Hotel Project (transportation study) prepared by Fehr & Peers, dated December 2019 and supplemented on April 7, 2020, and included in this IS-MND as Appendix TRA. The transportation study summarizes the proposed project's potential traffic impacts to the surrounding transportation system. The transportation study also includes evaluations of project site access, on-site circulation, parking, and intersection queuing. For the full transportation study, please see Appendix TRA.

State

CEQA GUIDELINES SECTION 15064.3

Section 15064.3 of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts and states that vehicle miles traveled is generally the most appropriate measure of transportation impacts. Per section 15064.3(c), the provisions of section 15064 shall apply statewide starting July 1, 2020. Therefore, until that date, lead agencies may elect to use methodology other than VMT.

Per section 15064.3(b)(1), projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact.

Regional

CONGESTION MANAGEMENT PROGRAM

In accordance with California Statute, Government Code Section 65088, C/CAG of San Mateo County acts as the County's Congestion Management Agency and has established a Congestion Management Program (CMP). The purpose of the CMP is to develop a comprehensive transportation improvement program among local jurisdictions that will reduce traffic congestion and improve land use decision-making and air quality. The CMP is required to be consistent with the Metropolitan Transportation Commission (MTC) planning process that includes regional goals, policies, and projects for the Regional Transportation Improvement Program (RTIP).

Congestion Management Agencies are required by California State statute to monitor roadway traffic congestion and the impact of land use and transportation decisions on a countywide level, at least every two years. C/CAG of San Mateo County conducts CMP monitoring and produces the CMP Monitoring and Conformance Report on an annual basis for freeways, rural highways and CMP-designated intersections. C/CAG of San Mateo County also prepares and adopts guidelines for preparing transportation impact analyses and traffic level of service (LOS) Analysis Guidelines, and Local Model Consistency Guidelines.

The San Mateo County CMP also includes Deficiency Plan Requirements. Deficiency plans, as they relate to traffic congestion management, are plans that identify offsetting measures to improve transportation conditions on the CMP facility in lieu of making physical traffic capacity improvements such as widening an intersection or roadway.

City of Millbrae

SIGNIFICANCE CRITERIA

The City of Millbrae has adopted specific significance criteria to measure a project's impact on the environment with respect to transportation. The General Plan establishes LOS D as the minimum acceptable threshold for signalized and unsignalized intersections. Based on this policy, the project's effect on intersection operations would be considered significant if the project would:

- Cause an intersection operating acceptably (LOS D or better) without the project to operate at LOS E or F;
- Increase the average delay at a signalized intersection operating at an unacceptable level (LOS E or F) by five or more seconds.

In addition, the projects effect on transit, pedestrian or bicycle facilities would be considered significant if the project would:

- Conflict with any existing or approved pedestrian, transit, and/or bicycle facilities or services;
- Cause the transit ridership demand to increase to levels greater than available capacity;
- Reduce access to transit service or create unsafe access for transit passengers;
- Cause pedestrian, transit, and/or bicycle facilities to be frequently blocked by cars or other potential safety obstructions/hazards;

- Cause vehicles to cross pedestrian or bicycle facilities on a regular basis at driveway entrances lacking adequate sight distance or warning systems;
- Encourage pedestrians to cross roads in undesignated areas

Impact Analysis

- Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*
- Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

The City of Millbrae has not adopted VMT methodology as of the preparation of the Traffic Impact Report and this IS-MND. Therefore, level of service (LOS) methodology is utilized to assess traffic congestion impacts.

Project trip generation was calculated using rates based on the trip generation rates of the existing hotels at the project site. As the trip generation rate is derived from existing driveway counts, it accounts for all vehicle trips entering and exiting the site. As shown in Table 22, the project would generate 86 new AM peak hour trips and 73 new PM peak hour trips, for a total of 383 AM peak hour trips and 326 PM peak hour trips (Appendix TRA).

Table 22 Estimated Project Peak Hour Trip Generation

Land Use	Weekday Peak Hour Total Trips	
	A.M.	P.M.
Existing Land Use		
Westin and Aloft Hotels	297	253
Proposed Project		
Moxy Hotel	86	73
Total Peak Hour Trips	383	326

Source: Appendix TRA

Level of Service

To evaluate the transportation infrastructure impacts due to the project's additional traffic, study intersections were evaluated by Fehr & Peers in accordance with the standards set forth by the LOS policies of the City of Millbrae. LOS is a qualitative measure that describes operational conditions as they relate to the traffic stream and perceptions by motorists and passengers. The LOS generally describes these conditions in terms of such factors as speed and travel time, delays, freedom to maneuver, traffic interruptions, comfort, convenience, and safety. The operational LOS are given letter designations from A to F, with A representing the best operating conditions (free-flow) and F the worst (severely congested flow with high delays). Intersections generally are the capacity-controlling locations with respect to traffic operations on arterial and collector streets in urban areas.

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401 East Millbrae Avenue Project (Moxy Hotel)

The transportation study considered the project's potential impacts to the following four intersections:

- Millbrae Avenue/Old Bayshore Highway/South McDonnell Road
- Millbrae Avenue/Highway 101 Northbound Ramps
- Millbrae Avenue/Highway 101 Southbound Ramps
- Millbrae Avenue/Rollins Road

Under existing conditions, all study intersections operate at LOS D or better. A 2040 Plus Project traffic scenario was developed to assess the cumulative impact of the project and future development on study intersections. This scenario considers the addition of traffic from the project together with development of the city and surrounding communities to the year 2040 using ABAG land use projections and reasonably foreseeable transportation network improvements. As shown in Table 22, all study intersections except for Millbrae Avenue/Rollins Road would operate at LOS D or better under 2040 Plus Project conditions. The Millbrae Avenue/Rollins Road intersection would operate at unacceptable LOS E under 2040 Plus Project conditions. However, intersection delay at Millbrae Avenue/Rollins Road would not increase by more than five seconds. Therefore, the project's contribution to intersection delay would not exceed City of Millbrae significance criteria. Impacts related to LOS would be less than significant (Appendix TRA).

Table 23 Study Intersection LOS: 2040 Plus Project Conditions

Intersection	Weekday Peak Hour LOS	
	A.M.	P.M.
Millbrae Avenue/Old Bayshore Highway/South McDonnell Road	C	D
Millbrae Avenue/US 101 NB Ramps	C	C
Millbrae Avenue/US 101 SB Ramps	D	C
Millbrae Avenue/Rollins Road	E	E

Source: Appendix TRA

Pedestrian, Bicycle, and Public Transit

Given the project's land use context and location, most project-generated trips would be made by automobile, and travel by alternative modes would represent a small proportion of the project's overall trip generation. The project would not substantially alter existing pedestrian, bicycle or transit access. The project would not conflict with any existing or approved pedestrian, transit, and/or bicycle facilities or services. Project-generated walking or biking trips would be minimal and designated access points to existing pedestrian or bicycling facilities, including the Bay Trail east of Old Bayshore Highway, would be provided. The project would provide adequate driveway access such that it would not cause pedestrian, transit, and/or bicycle facilities to be frequently blocked by cars or other potential safety obstructions/hazards. Based on the project location, accessibility of transit, demographics of hotel guests, and size of the project, it is expected that relatively few people would use transit to access the site. The project would not cause the transit ridership demand to increase to levels greater than available capacity, nor would it reduce access to transit

service or create unsafe access for transit passengers. Therefore, the project would not conflict with a program, plan or policy pertinent to pedestrian, bicycle or transit systems (Appendix TRA).

On-site Parking

Parking is not identified as an environmental impact topic in the CEQA Appendix G checklist. Therefore, discussion of parking is included for informational purposes only. The MMC Chapter 10.05.2100 requires hotels to provide one parking space per guest room. The project would add an additional 209 guest rooms to the existing 719 guest rooms at the Aloft and Westin Hotels for a total 928 guest rooms at the project site. As such, a total of 928 parking spaces would be required. 893 existing parking spaces are present at the project site and the project would reduce the number of spaces by 17 for a total of 876 available parking spaces. Although the number of parking spaces available would be less than the MMC requires, a parking demand assessment indicates that sufficient parking would be available. (The proposed project would require approval by the Planning Commission of a parking variance.) The parking demand rate at the existing Aloft and Westin Hotels was calculated at 0.85 spaces per occupied room. In addition, 14 of the existing spaces are utilized by hotel employees. Assuming Moxy Hotel guests park at the same rate and that five additional spaces would be used for employee parking, then full hotel room occupancy would yield a parking demand of 789 spaces. The parking supply would be 862 spaces (876 spaces minus 14 employee spaces), resulting in a surplus of 73 parking spaces (Appendix TRA).

Conclusion

The project would not conflict with any plan, ordinance, or policy and would meet required transportation standards. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*

Access to the project site would remain unchanged upon implementation of the project. Two driveways, one connecting to Millbrae Avenue and the other connecting to Old Bayshore Highway, would provide access to the project site, both with two-way traffic flow. The Millbrae Avenue driveway would likely carry most of project trips because it would provide the most direct access to the project's lobby. The project would not substantially alter the overall circulation patterns at the project site and on-site circulation would adequately accommodate additional vehicle and passenger loading demand.

In addition, as described above in Section 1, *Aesthetics*, the proposed sign would be a digital billboard and would add a source of light and glare that could increase visual hazards. However, requirements in MMC Chapter 10.10, Sign Regulations, would reduce impacts from light and glare. Compliance with such requirements would reduce light or glare impacts from the proposed sign to a less than significant level. Additionally, the Federal Highway Administration (FHWA) has addressed signage issues in relation to traffic safety, e.g., pursuant to the Highway Beautification Act (23 U.S.C Section 131), and has confirmed that no sign is allowed that imitates or resembles any official traffic sign, and that signs may not be installed in such a manner as to obstruct, or otherwise physically interfere with an official traffic sign, signal, or device, or to obstruct or physically interfere with the vision of drivers in approaching, merging or intersecting traffic. The State of California has also adopted the Outdoor Advertising Act (Business and Professions Code Section 5200 et seq., including

implementation provisions in California Code of Regs., Title 4, Division 6, Section 2240 et seq.), which address e.g., the frequency of message changes in electronic advertising displays. The proposed sign would also comply with any applicable FWHA (Highway Beautification Act) and Caltrans (Outdoor Advertising Act) requirements reducing any impacts to driver safety to a less than significant level.

Further, California Vehicle Code (Sections 21465-21467) regulates the brightness of outdoor advertising displays. The proposed sign would not include any prohibited flashing lights or images, and would comply with the applicable California Vehicle Code requirements.

The project does not include geometric design features or incompatible uses that would increase transportation hazards. The transportation study concludes that the project would include acceptable bicycle and pedestrian access and that on-site access and circulation are adequate for vehicles. Therefore, impacts related to geometric design features and transportation use compatibility would be less than significant.

LESS THAN SIGNIFICANT IMPACT

d. Would the project result in inadequate emergency access?

Emergency vehicles would access the project site from Millbrae Avenue and Old Bayshore Highway. As the project would not substantially alter circulation patterns at the project site, the transportation study concludes that adequate on-site access and circulation would be provided for all vehicles. Therefore, impacts related to emergency access would be less than significant.

LESS THAN SIGNIFICANT IMPACT

18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

As of July 1, 2015, California AB 52 of 2014 was enacted and expands CEQA by defining a new resource category, “tribal cultural resources.” AB 52 establishes that “A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and is:

1. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

The City of Millbrae sent AB 52 letters on November 5, 2019. As of January 9, 2020, the City has not received any response from AB 52 letters sent to the California Native American tribes.

- a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
- b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?*

No tribal cultural resources are expected to be present on-site; however, there is the possibility of encountering undisturbed subsurface tribal cultural resources. The proposed excavation of the project site could potentially result in adverse effects on unanticipated tribal cultural resources. Impacts to unanticipated tribal cultural resources would be reduced to less than significant levels with the following mitigation measure.

Mitigation Measure

TCR-1 Unanticipated Discovery of Tribal Cultural Resources

In the event that cultural resources of Native American origin are identified during construction, all earth disturbing work within 100 feet of the find must be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find and an appropriate Native American representative, based on the nature of the find, is consulted. If the City determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with Native American groups. The plan would include avoidance of the resource or, if avoidance of the resource is infeasible, the plan would outline the appropriate treatment of the resource in coordination with the archaeologist and the appropriate Native American tribal representative.

Significance After Mitigation

Implementation of Mitigation Measure TCR-1 would ensure any tribal cultural resources encountered during construction activities would be properly protected. This measure would reduce the potentially significant impact to a less than significant level.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

As discussed below under criteria (b), the project site would be served by adequate water supplies from the SFPUC. Therefore, the project would not result in the need for new or expanded water supply or wastewater treatment facilities. Moreover, as discussed in Section 10, *Hydrology and Water Quality*, criteria (c), the proposed project would not alter the existing drainage characteristics of the project site and can be accommodated by existing stormwater drainage infrastructure.

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Therefore, the project would not result in the need for new or expanded stormwater drainage facilities.

As discussed in Section 6, *Energy*, impacts from energy consumption would be less than significant. Project implementation would result in the commitment of additional energy resources, including consumption of energy during construction and operation. The project would incrementally increase electricity and natural gas demand compared to the existing land use on the site. The project site is connected currently to the electrical grid and natural gas lines. Electricity and natural gas would be supplied by PG&E and the project would not require the construction of new electrical or natural gas infrastructure. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The City of Millbrae obtains its municipal water supply from SFPUC. This water is delivered from the City and County of San Francisco's regional water supply, operated by the SFPUC. SFPUC's supply is predominantly from the Sierra Nevada, delivered from the Hetch Hetchy Reservoir through the Hetch Hetchy aqueducts, but also includes treated water produced by the SFPUC from its local watersheds and facilities in Alameda and San Mateo Counties (City of Millbrae 2016b).

The City of Millbrae addresses issues of water supply in its Urban Water Management Plan (UWMP) (City of Millbrae 2016b). The 2015 UWMP is a long-range planning document used to assess current and projected water usage, water supply planning and conservation and recycling efforts. According to the UWMP, the City of Millbrae has analyzed three different hydrological conditions to determine the reliability of water supplies: average/normal water year, single dry water year, and multiple, dry water year periods. In addition, the 2015 UWMP includes a Water Shortage Contingency Plan (WSCP), described in Section 8 of the 2015 UWMP. Using the measures in the WSCP to reduce the demands to the required supply availability, the 2015 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 2015 UWMP (i.e., through 2040).

As indicated by Table 24, the City is projected to meet its normal year water demands between 2020 and 2040. Projected demand grows from 958 million gallons in 2020 to 1,104 million gallons in 2040 while projected supply remains stable at 1,159 million gallons through 2040. In the year ending 2040, the projected supply surplus is 55 million gallons, which is approximately 4.7 percent of available supply. Table 25 presents shows the supply balance in the event of dry year(s). In the event of a single dry year, available supply would fall to 874 million gallons, exceeding demand by as much as 230 million gallons in 2040. In the event of multiple dry years, available supply would decrease to 740 million gallons during the second and third dry years, exceeding demand by as much as 364 million gallons in 2040 (City of Millbrae 2016b).

Table 24 City of Millbrae Water Supply/Demand Balance, Normal Year (million gallons)

	2020	2025	2030	2035	2040
Supply Total	1,159	1,159	1,159	1,159	1,159
Demand Total	958	994	994	1,032	1,104
Difference	201	165	165	127	55

Source: City of Millbrae 2016b, Table 7-6

Table 25 City of Millbrae Water Supply/Demand Balance, Multiple Dry Years (million gallons)

		2020	2025	2030	2035	2040
First Year	Demand Total	958	994	994	1,032	1,104
	Supply Total	874	874	874	874	874
	Difference	(84)	(120)	(120)	(158)	(230)
Second Year	Demand Total	958	994	994	1,032	1,104
	Supply Total	740	740	740	740	740
	Difference	(218)	(254)	(254)	(292)	(364)
Third Year	Demand Total	958	994	994	1,032	1,104
	Supply Total	740	740	740	740	740
	Difference	(218)	(254)	(254)	(292)	(364)

(-) indicates a negative number

Source: City of Millbrae 2016b, Table 7-8

To account for the potential water shortage under drought conditions, the City of Millbrae has adopted a WSCP. The WSCP establishes staged mandatory water use reductions that reduce water supply from 0-5 percent under a Stage 1 Water Shortage Alert with voluntary consumption to 36-50 percent under a Stage 5 Critical Water Emergency with emergency conservation (City of Millbrae 2016b). In addition, the WSCP establishes prohibited end uses of water under each water shortage stage. Furthermore, the City of Millbrae General Plan contains policies and actions that guide local response and regional coordination in the event of drought (City of Millbrae 1998).

The project would increase demand for potable water. Using an industry standard assumption that water use is approximately 120 percent of wastewater generation (27,170 gallons per day; refer to Table 26 below for estimated wastewater generation calculations), the project would require approximately 32,604 gallons of water per day, or 11.9 million gallons per year.

Sufficient water supplies would be available to serve the project from existing entitlements and resources under normal year conditions through 2040. In drought years, the project would be subject to all SFPUC rules and regulations to reduce water demand. With compliance with the City's General Plan policies and building standards, as well SFPUC rules and regulations, the project would not require new or expanded water entitlements and can be adequately served through at least 2040. The project would not result in a substantial physical deterioration of public water facilities or result in adverse physical impacts from new or expanded utility facilities due to increase use by the project. Therefore, impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

c. *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

The City operates a Water Pollution Control Plant (WPCP), which treats wastewater generated in Millbrae. The plant is located on the eastern edge of the City limits, adjacent to Highway 101 and near San Francisco Bay. Wastewater reaches the WPCP through a network of approximately 57 miles of sanitary sewer lines, which are primarily under gravity flow conditions. The WPCP is

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designed for a dry-weather operation of 3 million gallons per day (MGD), with a wet-weather peak capacity of 9 MGD. The City disposes of its treated effluent through a force main into San Francisco Bay (City of Millbrae 2016b).

The City does not have any published wastewater generation factors. Therefore, standard wastewater generation rates were used to estimate the amount of wastewater that would be generated by hotel (City of Los Angeles 2006). As shown in Table 26, the project would generate approximately 27,170 gallons of wastewater per day. From August 2008 through December 2012, its average dry weather flow was 1.3 MGD, as reported by the RWQCB (SFBRWQCB 2013). Therefore, the current available capacity of the WPCP is approximately 1.7 MGD. The project would result in an increased wastewater generation equivalent to less than 0.02 percent of the existing unused capacity of the WPCP. Therefore, there would be sufficient wastewater capacity to serve the project site. The project would not exceed wastewater treatment requirements or require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities. Therefore, impacts would be less than significant.

Table 26 Estimated Wastewater Generation

Type of Use	Quantity	Generation Factor	Amount (gallons per day)
Hotel ¹	209 rooms	130 gallons per day per room	27,170
Total			27,170

¹ use guest rooms only

Source: City of Los Angeles 2006

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- d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*
- e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

South San Francisco Scavenger Company collects solid waste under franchise with the City and would collect solid waste from the project site. Millbrae's solid waste is processed at a transfer station at Oyster Point in South San Francisco, and from there is transported primarily to the Corinda Los Trancos Landfill (also known as Ox Mountain Sanitary Landfill) in Half Moon Bay. CalRecycle reports that in 2018 a total of 12,114 tons of solid waste from Millbrae was disposed at 16 different landfills. Over 98 percent (11,931 tons) of Millbrae's solid waste generated in 2018 went to the Corinda Los Trancos Landfill, in Half Moon Bay, California (Cal Recycle 2019a). Table 27 shows the estimated remaining capacity and anticipated closure dates of landfills serving the city.

Table 27 Estimated Landfill Capacity and Closure Date

Landfill Facility	Permitted Capacity (cubic yards)	Remaining Capacity (cubic yards)	Anticipated Closure Date
Corinda Los Trancos Landfill	60,500,000 ¹	22,180,000 ¹	2034 ¹

¹ Cal Recycle 2019b

Assuming a waste generation rate of 1.31 tons of waste per guest room per year for hotel land uses, the hotel would generate approximately 273.79 tons of waste per year (CalRecycle 2015). However, the City of Millbrae Public Works Department requires project applicants to prepare and submit a Solid Waste Management Plan prior to the issue of permits. As a component of the Solid Waste Management Plan, applicants are required to estimate total solid waste generation and must achieve a recycling rate (diversion rate) of at least 50 percent by weight for all waste generated by the project. Therefore, the project would result in an increase of at most approximately 136.89 tons of waste per year (at a 50 percent diversion rate) that would be added to landfills serving the city. The incremental increase in solid waste associated with the project would be within the permitted capacities of Corinda Los Trancos Landfill.

The proposed project would be required to conform to federal, state, and local plans and policies to reduce solid waste generation, including all components of Title 6 (Sanitation and Health) of the MMC, which regulates garbage disposal and recycling, among other activities. The City is therefore served by landfills with adequate capacity to accommodate project waste. The proposed project would not result in a substantial physical deterioration of public solid waste facilities. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>a. <i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?</i></p> <p>b. <i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?</i></p> <p>c. <i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?</i></p> <p>d. <i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes</i></p>				

or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

As discussed in criterion (g) in Section 9, *Hazards and Hazardous Materials*, the project is not located in or near a Fire Hazard Severity Zone or Very High Hazard Severity Zone for wildland fires (CALFIRE 2007). Therefore, there would be no impacts related to wildfire.

NO IMPACT

21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

As noted in Section 4, *Biological Resources*, impacts related to biological species, including fish and wildlife, would be less than significant. As noted under Section 5, *Cultural Resources*, the proposed project would not impact known cultural or historic resources. Moreover, Mitigation Measure CUL-1 and Mitigation Measure TCR-1 would ensure that any unanticipated archaeological resources encountered during construction activities would be properly protected. This measure would reduce the potentially significant impact related to cultural and tribal cultural resources to a less than significant level. Impacts would therefore be less than significant with mitigation.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

As described in the discussion of environmental checklist Sections 1 through 20, the project would have no impact, a less than significant impact, or a less than significant impact after mitigation with respect to all environmental issues. There are no other known projects in development or under consideration that would affect the other resource areas. As such, cumulative impacts would also be less than significant (not cumulatively considerable).

LESS THAN SIGNIFICANT IMPACT

c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, geology and soils, traffic hazards, and noise impacts. As detailed in the preceding responses, the proposed project would not result, either directly or indirectly, in significant adverse impacts related to traffic, noise or air quality. Impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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