5. *Alternatives to the Proposed Project*

INTRODUCTION

The California Environmental Quality Act (CEQA) Guidelines set forth the intent and extent of alternatives analysis to be provided in an Environmental Impact Report (EIR). Section 15126.6(a) of the CEQA Guidelines states that:

> *An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.*

The alternatives evaluated in this Draft EIR were developed consistent with Section 15126.6(b) of the CEQA Guidelines, which states that:

> *Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.*

The following discussion is intended to inform the public and decision makers of feasible alternatives to the proposed Project that would avoid or substantially lessen any of the significant effects of the project. This chapter provides a summary of the reasonable range of alternatives, a summary of the proposed alternatives, including the buildout potential under each one, a summary of the potentially significant impacts and identifies the environmentally superior alternative. This chapter also contains the following three sub-chapters:

- Chapter 5.1, Alternatives to the Specific Plan Update
- Chapter 5.2, Alternatives to the TOD #1 Project
- Chapter 5.3, Alternatives to the TOD #2 Project

Each sub-chapter also provides a project description for each alternative, followed by an analysis of the potential direct, indirect and cumulative environmental impacts that could result from buildout under that alternative, including a determination of the level of significance of the potential environmental impacts that would occur based on the proposed alternative. In addition, each sub-chapter provides a discussion of how each alternative meets or fails to meet the project objectives. The existing baseline for each of these analyses would be the same as

what is discussed throughout Chapter 3, Project Description, of this Draft EIR for the proposed Project. For existing conditions information, please refer to Chapter 3, Project Description, of this Draft EIR.

SELECTION OF A REASONABLE RANGE OF ALTERNATIVES

As stated above, the range of potential alternatives to the proposed Project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects of the proposed Project. The following discussion describes the rationale for selecting the alternatives to be discussed in this chapter.

ASSUMPTIONS AND METHODOLOGY

The alternatives analysis is presented as a comparative analysis to the proposed Project and assumes that all applicable mitigation measures proposed for the Project would apply to each alternative. The same set of goals and policies apply under the Lower Intensity Alternative as the proposed Project.

A list of the potential impacts and mitigation measures is provided in Table 2-1 in Chapter 2, Executive Summary, of this Draft EIR. The choice of alternatives to the proposed Project for analysis in this Draft EIR focused on those that would further reduce and avoid the impacts found to be potentially significant, but less than significant with mitigation measures, and those found to be significant and unavoidable.

The alternatives analysis in Chapters 5.1 through 5.3 compares the potential significant environmental impacts of the two alternatives with those of the Project-related impacts for each of the environmental topics analyzed in detail in Chapter 4, Environmental Evaluation, of this Draft EIR. The impacts of each alternative are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the proposed Project.

ALTERNATIVES CONSIDERED AND REJECTED AS INFEASIBLE

Section 15126.6(c) of the State CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination. Section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in and EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. The following is a discussion of alternatives that were considered and rejected, along with the reasons they were not included in the analysis.

NO RESIDENTAL LAND USE

While an alternative with no residential land uses would reduce the proposed Project's contribution to vehicle trip miles (VMT) to and from the Specific Plan Area for this type of land use, it would not have the same benefits of reducing VMT from residents at the site that would opt to use public transit. In addition, any reduced VMT would

be counterbalanced with the increased office or retail that would replace the residential land uses. The No Residential Land Use alternative would not provide residential development to support the proposed Project's objective to ensure a Specific Plan Update that is consistent with the City's Priority Development Area (PDA) designation by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) through the Bay Area's Regional FOCUS program, and therefore encourages high density development in close proximity to transit nodes that will help to reduce greenhouse gas (GHG) emissions through a reduction in vehicle trips.

Ultimately, this alternative was rejected because it would not reduce VMT and would not help meet the demand for high-density dwelling units as a result of office and retail growth projected under the Specific Plan Update. The additional commercial and office growth would introduce employees to the city. Providing housing near these land uses would help to reduce regional and local traffic trips (i.e. VMT) and potentially reduce adverse cumulative air quality and GHG emission impacts. In addition, this alternative would fail to meet the Project objectives, which call for a land use plan that includes higher density residential near the Millbrae Bay Area Rapid Transit (BART)/Caltrain Station (Millbrae Station). For these reasons, a No Residential Land Use Alternative was considered and rejected.

50-PERCENT REDUCED DENSITY ALTERNATIVE

Development under the 50-Percent Reduced Density Alternative would occur under the policies, standards, and land use concept of the proposed Specific Plan Update, with the exception that the allowable density and intensity standards for all land uses would be reduced by 50 percent.

This alternative would reduce VMT from new office, retail, hotel and residential uses, and would therefore reduce associated air quality effects, GHG emissions, noise, and level of service impacts associated with traffic. In addition, this reduction level would also reduce water demand. However, as with the No Residential Land Use Alternative, the 50-percent Reduced Density Alternative would not provide enough new development activity to support the proposed Project's objective to ensure a Specific Plan Update that is consistent with the City's Priority PDA designation by the ABAG and the MTC through the Bay Area's Regional FOCUS program, and therefore encourages high density development in close proximity to transit nodes that will help to reduce GHG emissions through a reduction in VMT.

While this alternative would increase development in the Specific Plan Area in comparison to what would be allowed under existing plans and regulations, this alternative would represent an overall decrease in both residential and non-residential development. Overall, this alternative would decrease the existing development capacity of the Specific Plan Area, and in doing so would not meet the basic purpose of the proposed Specific Plan Update, which is to respond to economic shifts and transform the underdeveloped Specific Plan Area into a vibrant mixed-use activity district with a mixture of uses centered on the Millbrae Station, reinforcing its role as a significant regional and local transit hub and a community destination. With less development, this alternative would not support the variety of uses that are important in supporting vibrant, transit-oriented communities. Therefore, this alternative was rejected from a detailed analysis.

OVERVIEW OF SELECTED ALTERNATIVES

Two project alternatives were evaluated in in this Draft EIR. As previously stated the alternatives were developed to provide a range of development scenarios reflecting differences in the intensity of office and retail development and residential density within the Specific Plan Area; thereby, potentially reducing identified significant impacts of the proposed Project. The first alternative is the CEQA-required No Project Alternative. The second alternative, Lower Intensity Alternative, presents a lower intensity growth scenario when compared to the proposed Project, but within the same general land use patterns. These alternatives are described in detail in Chapters 5.1 through 5.3. The proposed new development for each alternative scenario is shown in Table 5-1 and the estimated buildout of each alternative is provided in Table 5-2.

TABLE 5-1 NET DEVELOPMENT COMPARISONS OF ALTERNATIVES TO THE PROPOSED PROJECT

	Specific Plan Update			TOD #1			TOD #2		
Category	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
Office (SF)	1,577,235	917,000	1,485,585	267,000	0	186,900	164,535	245,000	339,875
Industrial/ Non-Retail (SF)[a]	-335,240	-293,440	-335,240	0	-32,000	-32,000	0	0	0
Retail (SF)	142,535	45,900	88,345	32,000	25,000	22,400	46,935	0	32,855
Residential (Units)[b]	1,440	115	604	500	0	350	321	0	0
Hotel (Rooms)	325	961	325	0	500	0	116	0	116
Population[c]	3,808	2,547	1,601	1,325	0	928	851	0	0
Employees[d]	6,590	4,552	6,424	1,148	463	903	868	980	1,535

Notes: SF = square feet, TOD = transit-oriented development
a. The proposed Project would not include Industrial/Non-Retail land uses.
b. The proposed residential development would be multi-family units.
c. Population is based on 2.65 persons per dwelling units consistent with U.S. Census Bureau's 2005-2009 American Community Survey 5 year estimates. Temporary residents associated with the hotel, not shown on this table, are estimated at an average of 2 persons per room as part of the environmental review for this Draft EIR.
d. Jobs are calculated by applying 1 job/250 sf for office; 1 job/400 sf for retail; 1 job/1,000 sf industrial/non-retail; and 1 job per 1.25 hotel rooms.

POTENTIALLY SIGNIFICANT IMPACTS

As previously stated, the choice of alternatives to the proposed Project for analysis in this Draft EIR focused on those that would further reduce and avoid the significant-but-mitigable impacts and those impacts found to be significant and unavoidable. Table 5-2 summarizes the relative impacts of each of the alternatives compared to the proposed Project.

TABLE 5-2 COMPARISON OF IMPACTS FROM THE PROPOSED PROJECT ALTERNATIVES AND THE PROPOSED PROJECT

	Specific Plan Update			TOD #1			TOD #2		
Topic	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
AESTHETICS									
AES-1: Have a substantial adverse effect on a scenic vista.	LTS	=	=	LTS	=	=	LTS	=	=
AES-2: Substantially degrade the existing visual character or quality of the site and its surroundings.	LTS	=	=	LTS	=	=	LTS	=	=
AES-3: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	LTS	=	=	LTS	=	=	LTS	=	=
AES-5: Result in significant cumulative impacts with respect to visual resources.	LTS	=	=	LTS	=	=	LTS	=	=
AIR QUALITY									
AQ-1: Conflict with or obstruct implementation of the applicable air quality plan.	LTS	=	=	SU	=	=	SU	=	=
AQ-2: Violate any air quality standard or contribute substantially to an existing or projected air quality violation.	SU	<	<	SU	<	<	SU	<	<
AQ-3: 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors).	SU	<	<	SU	<	<	SU	<	<
AQ-4: Expose sensitive receptors to substantial pollutant concentrations.	SU	<	<	SU	<	<	SU	<	<
AQ-5: Create objectionable odors affecting a substantial number of people.	LTS	=	=	LTS	=	<	LTS	=	<

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	Specific Plan Update			TOD #1			TOD #2		
Topic	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
AQ-6: Result in significant cumulative impacts with respect to air quality.	SU	<	<	SU	<	<	SU	<	<
BIOLOGICAL RESOURCES									
BIO-1: 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.	LTS/M	=	=	LTS/M	=	=	LTS	=	=
BIO-2: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	No Impact	=	=	No Impact	=	=	No Impact	=	=
BIO-3: Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	LTS	=	=	LTS	=	=	LTS	=	=
BIO-4: 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.	No Impact	=	=	No Impact	=	=	No Impact	=	=
BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	LTS	=	=	LTS	=	=	LTS	=	=

TABLE 5-2 COMPARISON OF IMPACTS FROM THE PROPOSED PROJECT ALTERNATIVES AND THE PROPOSED PROJECT

	Specific Plan Update			TOD #1			TOD #2		
Topic	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
BIO-6: Result in significant cumulative impacts with respect to biological resources.	LTS	=	=	LTS	=	=	LTS	=	=
CULTURAL RESOURCES									
CULT-1: Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.	SU	=	=	LTS/M	=	=	No Impact	=	=
CULT-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	LTS/M	=	=	LTS/M	=	=	LTS/M	=	=
CULT-3: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	LTS/M	=	=	LTS/M	=	=	LTS/M	=	=
CULT-4: Disturb any human remains, including those interred outside of formal cemeteries.	LTS	=	=	LTS	=	=	LTS	=	=
CULT-5: Result in significant cumulative impacts with respect to cultural resources.	SU	=	=	SU	=	=	SU	=	=
GEOLOGY, SOILS, AND SEISMICITY									
GEO-1: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving surface rupture along a known active fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction and landslides.	LTS/M	=	=	LTS/M	=	=	LTS/M	=	=
GEO-2: Result in substantial soil erosion or the loss of topsoil.	LTS	=	=	LTS	=	=	LTS	=	=

TABLE 5-2 COMPARISON OF IMPACTS FROM THE PROPOSED PROJECT ALTERNATIVES AND THE PROPOSED PROJECT

	Specific Plan Update			TOD #1			TOD #2		
Topic	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
GEO-3: 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.	LTS/M	=	=	LTS/M	=	=	LTS/M	=	=
GEO-4: Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2010), creating substantial risks to life or property.	LTS/M	=	=	LTS/M	=	=	LTS/M	=	=
GEO-5: Result in significant cumulative impacts with respect to geology and soils.	LTS/M	=	=	LTS/M	=	=	LTS/M	=	=
GREENHOUSE GAS EMISSIONS									
GHG-1: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.	LTS	<	<	LTS	<	<	LTS	<	<
GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.	LTS	<	<	LTS	<	<	LTS	<	<
GHG-3: Result in significant cumulative impacts with respect to greenhouse gas emissions.	LTS	<	<	LTS	<	<	LTS	<	<
HAZARDS AND HAZARDOUS MATERIALS									
HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	LTS	=	=	LTS	=	=	LTS	=	=
HAZ-2: 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.	LTS	=	=	LTS	=	=	LTS	=	=

TABLE 5-2 COMPARISON OF IMPACTS FROM THE PROPOSED PROJECT ALTERNATIVES AND THE PROPOSED PROJECT

	Specific Plan Update			TOD #1			TOD #2		
Topic	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	LTS	=	=	LTS	=	=	No Impact	=	=
HAZ-4: Be located on a site which is included on a list of hazardous materials 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.	LTS/M	=	=	No Impact	=	=	LTS/M	=	=
HAZ-5: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	LTS	=	=	LTS	=	=	LTS	=	=
HAZ-6: Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.	LTS	=	=	LTS	=	=	LTS	=	=
HAZ-7: Result in significant cumulative impacts with respect to hazards and hazardous materials.	LTS/M	=	=	LTS	=	=	LTS/M	=	=
HYDROLOGY AND WATER QUALITY									
HYDRO-1: Violate any water quality standards or waste discharge requirements.	LTS	=	=	LTS	=	=	LTS	=	=

TABLE 5-2 COMPARISON OF IMPACTS FROM THE PROPOSED PROJECT ALTERNATIVES AND THE PROPOSED PROJECT

	Specific Plan Update			TOD #1			TOD #2		
Topic	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
HYDRO-2: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).	LTS	=	=	LTS	=	=	LTS	=	=
HYDRO-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.	LTS	=	=	LTS	=	=	LTS	=	=
HYDRO-4: 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.	LTS	=	=	LTS	=	=	LTS	=	=
HYDRO-5: Otherwise substantially degrade water quality.	LTS	=	=	LTS	=	=	LTS	=	=
HYDRO-6: Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.	No Impact	=	=	No Impact	=	=	No Impact	=	=
HYDRO-7: Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.	No Impact	=	=	No Impact	=	=	No Impact	=	=
HYDRO-8: Inundation by seiche, tsunami, or mudflow.	No Impact	=	=	No Impact	=	=	No Impact	=	=

TABLE 5-2 COMPARISON OF IMPACTS FROM THE PROPOSED PROJECT ALTERNATIVES AND THE PROPOSED PROJECT

	Specific Plan Update			TOD #1			TOD #2		
Topic	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
HYDRO-9: Result in significant cumulative impacts with respect to hydrology and water quality.	LTS	=	=	LTS	=	=	LTS	=	=
LAND USE AND PLANNING									
LU-1: Physically divide an established community.	No Impact	=	=	No Impact	=	=	No Impact	=	=
LU-2: Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	LTS	>	>	LTS	>	<	LTS	>	>
LU-3: Result in significant cumulative impacts with respect to land use and planning.	LTS	=	=	LTS	=	=	LTS	=	=
NOISE									
NOISE-1: Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	LTS	=	=	LTS/M	<	<	LTS/M	<	<
NOISE-2: Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	LTS	=	=	LTS/M	<	<	LTS/M	<	<
NOISE-3: A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.	LTS	=	=	LTS	<	<	LTS	<	<
NOISE-4: A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	LTS	=	=	LTS/M	<	<	LTS/M	<	<

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	Specific Plan Update			TOD #1			TOD #2		
Topic	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
NOISE-5: Cause exposure of people residing or working in the vicinity of the plan area to excessive aircraft noise levels, for a project located within an airport land use plan, or where such a plan has been adopted, within 2 miles of a public airport or public use airport.	LTS	=	=	LTS/M	<	<	LTS/M	<	<
NOISE-6: Result in significant cumulative impacts with respect to noise.	LTS	=	=	LTS/M	<	<	LTS/M	<	<
POPULATION AND HOUSING									
POP-1: Induce substantial unexpected population growth, or growth for which inadequate planning has occurred, either directly or indirectly.	LTS	=	=	LTS	=	=	LTS	=	=
POP-2: Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.	LTS	=	=	LTS	=	=	No Impact	=	=
POP-3: Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.	LTS	=	=	LTS	=	=	LTS	=	=
POP-4: Result in significant cumulative impacts with respect to population and housing.	LTS	=	=	LTS	=	=	LTS	=	=

TABLE 5-2 COMPARISON OF IMPACTS FROM THE PROPOSED PROJECT ALTERNATIVES AND THE PROPOSED PROJECT

	Specific Plan Update			TOD #1			TOD #2		
Topic	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
PUBLIC SERVICES AND RECREATION									
Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:									
PS-1: Fire protection	LTS	<	<	LTS	<	<	LTS	<	<
PS-2: Fire protection (cumulative)	LTS	<	<	LTS	<	<	LTS	<	<
PS-3: Police protection	LTS	<	<	LTS	<	<	LTS	<	<
PS-4: Police protection (cumulative)	LTS	<	<	LTS	<	<	LTS	<	<
PS-5: Schools	LTS	<	<	LTS	<	<	LTS	<	<
PS-6: Schools (cumulative)	LTS	<	<	LTS	<	<	LTS	<	<
PS-7: Libraries	LTS	<	<	LTS	<	<	LTS	<	<
PS-8: Libraries (cumulative)	LTS	<	<	LTS	<	<	LTS	<	<

TABLE 5-2 COMPARISON OF IMPACTS FROM THE PROPOSED PROJECT ALTERNATIVES AND THE PROPOSED PROJECT

	Specific Plan Update			TOD #1			TOD #2		
Topic	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
PS-9: Result in substantial adverse physical impacts associated with the provision of new or physically altered parks and recreational facilities, need for new or physically altered parks and recreation facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives.	LTS	<	=	LTS	=	=	LTS	=	=
PS-10: 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.	LTS	<	=	LTS	=	=	LTS	=	=
PS-11: Include recreation facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	LTS	<	=	LTS	=	=	LTS	=	=
PS-12: Result in significant cumulative impacts with respect to parks and recreational facilities.	LTS	<	=	LTS	=	=	LTS	=	=
TRANSPORTATION AND CIRCULATION[a]									
TRANS-1, 8, 15: Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.	SU	<	<	SU	<	<	SU	<	<

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	Specific Plan Update			TOD #1			TOD #2		
Topic	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
TRANS-2, 9, 16: Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.	SU	<	<	SU	<	<	SU	<	<
TRANS-3, 10, 17: Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.	LTS	=	=	LTS	=	=	LTS	=	=
TRANS-4, 11, 18: Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment).	SU	=	=	SU	=	=	ST	=	=
TRANS-5, 12, 19: Result in inadequate emergency access.	LTS	=	=	LTS	=	=	LTS	=	=
TRANS-6, 13, 20: Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	LTS	=	=	LTS/M	=	=	LTS/M	=	=
TRANS-7, 14, 21: Result in significant cumulative impacts with respect to traffic and circulation.	SU	<	<	SU	<	<	SU	<	<
UTILITIES AND SERVICE SYSTEMS									
Water Supply									
UTIL-1: Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed	SU	<	<	SU	<	<	SU	<	<

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	Specific Plan Update			TOD #1			TOD #2		
Topic	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
UTIL-2: Require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	LTS	<	<	LTS	<	<	LTS	<	<
UTIL-3: Result in cumulative impacts with respect to water supply.	SU	<	<	SU	<	<	SU	<	<
Wastewater									
UTIL-4: Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.	LTS	<	<	LTS	<	<	LTS	<	<
UTIL-5: Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	LTS	<	<	LTS	<	<	LTS	<	<
UTIL-6: 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 providers existing commitments.	LTS	<	<	LTS/M	<	<	LTS/M	<	<
UTIL-7: Result in cumulative impacts with respect to wastewater.	LTS	<	<	LTS/M	<	<	LTS/M	<	<
Solid Waste									
UTIL-8: Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	LTS	<	<	LTS	<	<	LTS	<	<
UTIL-9: Comply with federal, state, and local statutes and regulations related to solid waste.	No Impact	=	<	No Impact	=	=	No Impact	=	=
UTIL 10: Result in cumulative impacts with respect to solid waste.	LTS	<	<	LTS	<	<	LTS	<	<

TABLE 5-2 COMPARISON OF IMPACTS FROM THE PROPOSED PROJECT ALTERNATIVES AND THE PROPOSED PROJECT

	Specific Plan Update			TOD #1			TOD #2		
Topic	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity	Proposed Project	No Project	Lower Intensity
Energy Conservation									
UTIL-11: Result in a substantial increase in natural gas and electrical service demands, which would require new energy supply facilities and distribution infrastructure or capacity enhancing alterations to existing facilities.	LTS	<	<	LTS	<	<	LTS	<	<
UTIL-11: Result in cumulative impacts with respect to energy conservation.	LTS	<	<	LTS	<	<	LTS	<	<

Notes:
LTS Less Than Significant
LTS/M Less Than Significant with Mitigation
SU Significant and Unavoidable
< Impacts would be less in comparison to the proposed Project
= Impacts would be similar in comparison to the proposed Project
> Impacts would be greater in comparison to the proposed Project
a. Transportation and Circulation impacts are numbered to reflect the impact analysis in Chapter 4.14, which is presented in three subsections by Specific Plan Updates (TRANS-1 through TRANS-7), TOD #1 project (TRANS-8 through TRANS-14) and TOD #2 project (TRANS-15 through TRANS-21). Accordingly, TRANS-1, 8, and 15 are the same threshold statement for each Project component.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed Project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an "environmentally superior" alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of Millbrae. The proposed Project under consideration cannot be identified as the environmentally superior alternative. Additionally, in accordance with State CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the "No Project" Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

As discussed in the analysis above, the Lower Intensity Alternative would result in less development than that of the proposed Project. As shown in Table 5-2, this Alternative would reduce the significant-and-unavoidable impacts related to air quality, land use and planning, traffic and circulation, and water supply, and would reduce the less-than-significant impacts to GHG emissions, public services, wastewater, solid waste and energy conservation. While the Lower Intensity Alternative was found to be inconsistent with the General Plan Housing Element and the *Plan Bay Area's* Transit Station PDA, theses inconsistencies are not a direct physical impact to the environment in and of themselves. For these reasons, the Lower Intensity Alternative is considered the environmentally superior alternative.

In conclusion, the Lower Intensity Alternative would generally meet the Project objectives, but substantially decrease the overall development from that of the proposed Project. As a result, the Lower Intensity Alternative would result in similar environmental impacts as those of the proposed Project and consequently provide less development potential and high-density housing for the City of Millbrae. Therefore, while the Lower Intensity Alternative is the environmentally superior alternative, it would not provide the greatest service to Millbrae with regards to economic development and high-density housing.