# 5.2 ALTERNATIVES TO THE TOD #1 PROJECT

This sub-chapter provides a description of the alternatives to the TOD #1 project, followed by an analysis of the potential direct, indirect and cumulative environmental impacts that could result from buildout under each alternative, including a determination of the level of significance of the potential environmental impacts that would occur under each specific alternative. In addition, this sub-chapter provides a discussion of how each alternative meets or fails to meet the project objectives. The existing baseline for each of these analyses would be the same as what is discussed throughout Chapter 3, Project Description, of this Draft EIR for the proposed Project. For existing conditions information, please refer to Chapter 3, Project Description, of this Draft EIR.

## 5.2.1 POTENTIALLY SIGNIFICANT IMPACTS

As previously stated in Chapter 5, the choice of alternatives to the proposed TOD #1 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 as shown in Table 5.2-1.

TABLE 5.2-1 SIGNIFICANT IMPACTS UNDER THE TOD #1 PROJECT

| Impact Statement by Topic | Conclusion |
|---|---|
| AIR QUALITY | |
| Impact AQ-TOD#1-1: The proposed TOD #1 project, when considered with the proposed TOD #2 project, would exceed the projected growth increase for the city and exceed Bay Area Air Quality Management District's (BAAQMD's)regional significance thresholds. Therefore, it would conflict with or obstruct implementation of the *2010 Bay Area Clean Air Plan*. | SU |
| Impact AQ-TOD#1-2: Operation of the proposed TOD #1 project would generate emissions that exceed BAAQMD's regional operational-phase significance thresholds for Volatile Organic Compounds (VOC) and nitrogen oxides ($NO_X$). | SU |
| Impact AQ-TOD#1-3.1: Construction of the proposed TOD #1 project would result in exceedance of BAAQMD's risk thresholds. | SU |
| Impact AQ-TOD#1-3.2: Implementation of the proposed TOD #1 project would exceed BAAQMD's regional significance thresholds. | SU |
| Impact AQ-TOD#1-3.3: Risks levels for the on-site sensitive receptors could exceed BAAMD's applicable cumulative cancer risk threshold of 100 in a million due to the siting of the project site to sources of toxic air contaminants (TACs). | LTS/M |
| Impact AQ-TOD#1-4.1: Risk impacts to nearby sensitive receptors from construction of the proposed TOD #1 project would exceed the cancer risk threshold of 10 in a million. | SU |
| Impact AQ-TOD#1-4.2: Due to the proximity of the proposed TOD #1 project site to high-volume roadways and potentially other stationary sources, on-site residents could potentially be exposed to substantial TAC concentration. | LTS/M |

TABLE 5.2-1 SIGNIFICANT IMPACTS UNDER THE TOD #1 PROJECT

| Impact Statement by Topic | Conclusion |
|---|---|
| BIOLOGICAL RESOURCES | |
| Impact BIO-TOD#1-1.1: The proposed TOD #1 project could result in inadvertent loss of bird nests in active use, which would conflict with the federal Migratory Bird Treaty Act and California Fish and Game Code if adequate controls and preconstruction surveys are not implemented. | LTS/M |
| Impact BIO-TOD#1-1.2: The proposed TOD #1 project could result adversely affect the pallid bat if adequate controls are not implemented. | LTS/M |
| CULTURAL RESOURCES | |
| Impact CULT-TOD#1-1: The TOD #1 Project could adversely affect historical resources. | LTS/M |
| Impact CULT-TOD#1-2: The proposed TOD #1 project would have the potential to cause a significant impact to an archaeological resource pursuant to CEQA Guidelines Section 15064.5. | LTS/M |
| Impact CULT-TOD#1-3: The proposed TOD #1 project would have the potential to directly or indirectly affect a unique paleontological resource or site, or unique geologic feature. | LTS/M |
| GEOLOGY, SOILS, AND SEISMICITY | |
| Impact GEO-TOD#1-1: The proposed TOD #1 project could expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving surface rupture along a known active fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction and landslides. | LTS/M |
| Impact GEO-TOD#1-3: The proposed TOD #1 project could result in a significant impact related to development on unstable geologic units and soils or result in lateral spreading, subsidence, liquefaction, or collapse. | LTS/M |
| Impact GEO-TOD#1-4: The proposed TOD #1 project could create substantial risks to property as a result of its location on expansive soil, as defined by Section 1803.5.3 of the California Building Code. | LTS/M |
| LAND USE | |
| Impact LU-TOD#1-2: The maximum height proposed by the TOD #1 project height exceeds the maximum height identified in the Specific Plan Update for the project site. | SU |
| NOISE | |
| Impact NOISE-TOD#1-1: The proposed TOD #1 project would expose people to or generate noise levels in excess of standards established in the General Plan, and/or the applicable standards of other agencies. | LTS/M |
| Impact NOISE-TOD#1-2.1: The proposed TOD #1 project could result in the exposure of persons to or generation of excessive short-term construction-related groundborne vibration or groundborne noise levels. | LTS/M |
| Impact NOISE-TOD#1-2.2: The proposed TOD #1 project could result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels from Vibration Related to Railway Transportation Activity. | LTS/M |
| Impact NOISE-TOD#1-4: Construction activities associated with the proposed TOD #1 project would result in substantial temporary or periodic increases in ambient noise levels in the vicinity of the TOD #1 project site above existing levels. | LTS/M |
| Impact NOISE-TOD#1-5: The TOD #1 project would cause exposure of people residing or working in the vicinity of the TOD #1 project site to excessive aircraft noise levels. | LTS/M |

TABLE 5.2-1 SIGNIFICANT IMPACTS UNDER THE TOD #1 PROJECT

| Impact Statement by Topic | Conclusion |
|---|---|
| TRANSPORTATION AND CIRCULATION | |
| Impact TRANS-TOD #1-8.1: The proposed TOD #1 project would add traffic to intersection #4 El Camino Real/Millbrae Avenue, which currently operates at LOS E during the PM peak hour. Traffic added by the proposed TOD #1 project would increase vehicle delay at this intersection by more than five (5) seconds in the PM peak hour under Existing (2014) Plus Project (TOD #1) conditions and result in the intersection operating at LOS F. | SU |
| Impact TRANS-TOD#1-8.2: The proposed TOD #1 project would result in the addition of traffic to intersection #4 El Camino Real/Millbrae Avenue and causing this intersection to degrade from LOS D to LOS E in the AM peak hour and would add more than five (5) seconds of delay in the PM peak hour (operating at LOS F under baseline), resulting in LOS F under Near Term (2020) Plus Project (TOD #1) conditions. The worsening of traffic conditions at this location is due primarily to the increase in traffic from the proposed TOD #1 project using El Camino Real as a regional and local access point. | SU |
| Impact TRANS-TOD#1-8.3: The proposed TOD #1 project would add traffic to intersection #4 El Camino Real/Millbrae Avenue, which is expected to operate at LOS E during the AM peak hour and at LOS F during the PM peak hour under Cumulative (2040) No Project (TOD #1) conditions. Traffic added by the proposed TOD #1 project would increase vehicle delay at this intersection by more than five (5) seconds in the AM and PM peak hours under Cumulative (2040) Plus Project (TOD #1) conditions and result in the intersection operating at LOS F. | SU |
| Impact TRANS-TOD#1-8.4: The proposed TOD #1 project would result in the addition of traffic to intersection #5 El Camino Real/Murchison Drive and would cause this intersection to degrade from LOS D to LOS E in the PM peak hour under Cumulative (2040) Plus Project (TOD #1) conditions. | SU |
| Impact TRANS-TOD#1-8.5: The proposed TOD #1 project would contribute a considerable level of traffic to intersection #7 California Drive/Murchison Drive and cause this intersection to degrade from LOS D to LOS E in the AM and PM peak hour under Cumulative (2040) Plus Project (TOD #1) conditions. In addition, the intersection meets the Caltrans peak hour signal warrant for urbanized areas (Warrant 3). | SU |
| Impact TRANS-TOD#1-9: As discussed under TRANS-8, implementation of the proposed TOD #1 project would result in a *significant* impact at the CMP facilities during at least one (1) of the peak hours under Existing (2014), Near Term (2020) and Cumulative (2040) conditions as follows:<br>Existing (2014) Plus Project (TOD #1)<br>▪ El Camino Real/Millbrae Avenue – AM and PM peak hour<br>Near Term (2020) Plus Project (TOD #1)<br>▪ El Camino Real/Millbrae Avenue – AM and PM peak hour<br>Cumulative (2040) Plus Project (TOD #1)<br>▪ El Camino Real/Millbrae Avenue – AM and PM peak hours | SU |
| Impact TRANS-TOD#1-11: Queues that were already exceeding available storage space under Existing (2014) conditions were exacerbated under Existing (2014) Plus Project (TOD #1) conditions at and between the intersections of El Camino Real/Millbrae Avenue and Rollins Road/Millbrae Avenue resulting in hazardous driving conditions from backed up traffic. | SU |
| Impact TRANS-TOD#1-13: The proposed TOD #1 project would reduce access to transit service or create unsafe access for transit passengers. | LTS/M |
| UTILITIES AND SERVICE SYSTEMS | |
| Water Supply | |
| Impact UTIL-TOD#1-1: Implementation of the proposed TOD #1 project would not have sufficient water supplies available to serve the project from existing entitlements and resources during multiple dry years. | SU |

TABLE 5.2-1 SIGNIFICANT IMPACTS UNDER THE TOD #1 PROJECT

| Impact Statement by Topic | Conclusion |
|---|---|
| **Wastewater** | |
| Impact UTIL-TOD#1-6: The proposed TOD #1 project would adversely affect the already limited capacity of sewer pipes adjacent to the TOD #1 project area. | LTS/M |

Notes:
SU Significant and Unavoidable
LTS/M Less Than Significant with Mitigation

## 5.2.2 PROJECT OBJECTIVES

The primary intent of the proposed TOD #1 project is to develop a high-quality mixed-use development in the Specific Plan Area. In coordination with the City, the Applicant has developed the following project objectives that are meant to aid decision-makers in their review of the proposed TOD #1 project, the alternatives to the proposed TOD #1 project, and associated environmental impacts:

- Design and construct a project consistent with the intent of the proposed Specific Plan Update.
- Redevelop an underutilized property within the Specific Plan Area to provide a high-quality, high-density mixed-use project directly adjacent to the Millbrae Station that provides a well-designed and well-situated mixed-use development for current and future residents and employees desiring to reside and work in a transit friendly environment in Millbrae with convenient transit connectivity to the larger Bay Area.
- Build a project 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, which is intended to encourage high density new development in close proximity to transit nodes that will help to reduce greenhouse gas emissions through a reduction in vehicle trips.
- Redevelop an underutilized property within the Specific Plan Area with a commercially viable mixed-use development including up to Class A office, retail and high-density residential units for the Millbrae and its residents.
- Redevelop an underutilized property within the Specific Plan Area with mixed-use development within a half-mile of the Millbrae's primary gateway near Highway 101 for direct access to the San Francisco International Airport (SFO) and adjacent to the Millbrae Station to provide convenient access for residents and employees to utilize public transit.
- Design and construct a project that accommodates the needs of transit service providers to ensure safe and reliable transit access.
- Design and construct a project that facilitates multi-modal access and emphasizes connections to transit.
- Design and construct a high-quality mixed-use development that minimizes the impact of new development on the character of surrounding residential neighborhoods and adds to the visual character of El Camino Real. Activate public open spaces and streets by fronting them with pedestrian-friendly ground floor design and active retail uses.

- Design and construct a project that provides publicly accessible open spaces.
- Achieve sustainable aspects of construction through current green building practices.

## 5.2.3 ALTERNATIVES ANALYSIS

In accordance with the CEQA Guidelines, the alternatives and the comparative merits of the alternatives are discussed below. As previously stated, the alternatives were selected because of their potential to reduce the significant impacts of the proposed TOD #1 project shown in Table 5.2-1.

The alternatives to be analyzed in comparison to the proposed TOD #1 project include:

- No Project Alternative
- Lower Intensity Alternative

The first alternative discussed is the CEQA-required No Project Alternative. The second alternative presents a lower intensity growth scenario when compared to the proposed TOD #1 project, but within the same general land use patterns. The proposed new development and the estimated buildout of each alternative is provided in Table 5.2-2.

TABLE 5.2-2 DEVELOPMENT POTENTIAL COMPARISONS OF ALTERNATIVES TO THE PROPOSED TOD #1 PROJECT

| | Proposed Project | No Project | Lower Intensity |
|---|---|---|---|
| Office (SF) | 267,000 | 0 | 186,900 |
| Industrial/Non-Retail (SF)[a] | 0 | -32,000 | -32,000 |
| Retail (SF) | 32,000 | 25,000 | 22,400 |
| Residential (Units)[b] | 500 | 0 | 350 |
| Hotel (Rooms) | 0 | 500 | 124 |
| Population[c] | 1,325 | 0 | 1,027 |
| Employees[d] | 1,148 | 463 | 903 |

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

## 5.2.3.1 NO PROJECT ALTERNATIVE

### Description

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

As shown in Table 5.2-2, the No Project Alternative would result in no office or residential development, and less retail and hotel development when compared to the proposed TOD #1 project. The maximum height permitted under the 1998 Specific Plan is 75 feet.

The federal and State Regulations, General Plan policies, and Municipal Code development standards that apply to the proposed TOD #1 project, would also apply to this Alternative, and all mitigation measures listed in Chapters 4.1 through 4.14 would also apply to their respective impacts under this Alternative.

Even if no action were taken on the TOD #1 project, regional growth, and the associated environmental effects linked to this growth, would continue to occur under the provisions of the current 1998 Specific Plan.

### Impact Discussion

The potential environmental impacts associated with the No Project Alternative are described below and are compared to the TOD #1 project. 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 TOD #1 project.

#### *Aesthetics*

Chapter 4.1, Aesthetics, finds that the proposed TOD #1 project would result in less-than-significant impacts to aesthetics. As described in detail in Section 4.1.1.2, Existing Conditions, in Chapter 4.1, Aesthetics, of this Draft EIR, the TOD #1 project site is concentrated on parcels within the current Specific Plan Area in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development, where future development would have a lesser impact on scenic vistas. Additionally, the topography of TOD #1 project site is essentially flat and the views from street-level public viewing to surrounding scenic vistas are currently inhibited by the existing buildings, structures, and mature trees/vegetation.

Under the No Project Alternative, the proposed TOD #1 project would be constructed with retail and a hotel with up to 500 rooms; no office or residential development would occur. However, the maximum height (75 feet) currently permitted on the project site under the 1998 Specific Plan would continue to limit the opportunity for views of scenic vistas from street-level public viewing around the project site. Furthermore, same as the proposed TOD #1 project, development under the No Project Alternative would be subject to the policies of the General

Plan, the 1998 Specific Plan, and the Municipal Code development standards that would ensure development on the project site would protect views of scenic vistas. Considering these regulations and the fact that the project site and surrounding roadways are not considered destination public viewing points nor are they visible from surrounding scenic vistas, overall impacts to scenic vistas would be *similar* under both scenarios.

As with the proposed TOD #1 project, development under the No Project Alternative would represent a change to the existing visual character, but would not substantially degrade the existing visual character or quality of the surroundings. As discussed in Chapter 4.1, the surrounding area to the east, south and west exhibits a similar built environment as the proposed TOD #1 project and the No Project Alternative. Any development on the project site would be required to comply with General Plan Policy H2.9, which requires the protection of the character of existing residential neighborhoods. Compliance with this policy would ensure the visual quality of the surrounding area would be protected. Development under the No Project Alternative, like the proposed TOD #1 project, would be subject to the City's Design Review process and to existing General Plan policies identified in Table 4.1-1 in Chapter 4.1, that aim to protect the visual character of Millbrae. In particular, Policy LU2.1 requires quality site planning, architecture and landscape design for all new development, renovation or remodeling. Compliance with these regulations would reduce visual inconsistency and promote design that is complementary to and harmonious with adjacent properties and the surrounding area. Accordingly, impacts would be *similar* under both scenarios.

The project site and surrounding area is almost fully developed with various uses, including an on-site vacant lumber yard, warehouse, and nursing facility, and adjacent Millbrae Station, surface parking lots and parking structure, commercial, industrial, and multi-family residential mixed-use. Future development under the No Project Alternative would replace existing low-rise buildings with medium- to high-rise buildings, adding new sources of light, such as exterior lighting, indoor lighting, and safety lighting. In addition to compliance with City's Design Review process, General Plan, and 1998 Specific Plan, the City has adopted the California Building Code per Municipal Code Section 9.05.010, which includes standards for outdoor lighting that are intended to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls. Like the proposed TOD #1 project, the No Project Alternative's interior and exterior lighting would be consistent with the urbanized context of the project site and surrounding area, and impacts from substantial light and glare such that could degrade daytime or nighttime views, or pose a hazard to drivers on nearby roadways would be *similar* under both scenarios.

In summary, Chapter 4.1 finds that potential impacts from the TOD #1 project would be avoided through consistency with General Plan policies and Zoning Ordinance performance standards that would also apply to new development under the No Project Alternative. Under both scenarios, future projects would be subject to the City's Design Review process. In addition, development on the TOD #1 site under the No Project Alternative would be required to comply with the 1998 Specific Plan. Therefore, potential aesthetics impacts under the No Project Alternative would be *similar* when compared to the TOD #1 project.

### *Air Quality*

As described in Chapter 4.2, Air Quality, the proposed TOD #1 project would result in six significant and unavoidable impacts, and one significant-but-mitigable impact with the implementation of Mitigation Measure AQ-TOD#1-4.2 (operational health risk assessment).

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

The No Project Alternative would allow less retail and a hotel with up to 500 rooms, but no residential or office development would occur under the City's existing 1998 Specific Plan and Zoning Ordinance. Under the No Project Alternative, the reduced development would reduce impacts associated with the construction and operation of these uses. Additionally, Mitigation Measures AQ-TOD#1-2.1 (operation impacts) and AQ-TOD#1-4.1a (construction impacts) and AQ-TOD#1-4.1b (construction health risk assessment), which would reduce air quality impacts, would also apply to the development under the No Project Alternative.

Reducing retail and eliminating office and residential near the Millbrae Station could result in a higher percentage of transit users that may rely on automobiles (as opposed to walking or biking) to and from the project site. Therefore, the No Project Alternative would not necessarily reduce trips to the project site as a result of reducing these types of development, which are the major source of criteria air pollutants from the TOD #1 project. However, because the No Project Alternative would result in less overall development than the proposed TOD #1 project, air quality impacts would from the operation of these uses would be *less*.

Due to the proximity of the project site to high-volume roadways and potentially other stationary sources, on-site sensitive receptors under both the proposed TOD #1 project and the No Project Alternative could potentially be exposed to TAC concentration; however, unlike the proposed TOD #1 project, the hotel sensitive receptors would be exposed to TAC concentrations for a substantially shorten durations when compared to full-time residents under the proposed TOD #1 project and impacts would be *less*.

Same as the proposed TOD #1 project, the No Project Alternative is not the type of project that would result in significant impacts from odor and impacts would be *similar* under both scenarios.

Overall, because the No Project Alternative would result in less development, including eliminating residential uses from the project site, air quality impacts would be *less* when compared to the proposed TOD #1 project.

### *Biological Resources*

As discussed in Chapter 4.3, Biological Resources, the project site is built out and urbanized, which greatly limits the likelihood of continued occurrence of most special-status plant and animal species. However, redevelopment under the proposed TOD #1 project and the No Project Alternative would have the potential to adversely affect

pallid bats, a special-status species that roosts in crevices and abandoned buildings, as well as one or more species of birds protected under the Migratory Bird Treaty Act and State Fish and Game Code. This impact would be mitigated to a less-than-significant level through the implementation of Mitigation Measures BIO-TOD#-1.1 and BIO-TOD#1-1.2, which would also apply to future development under the 1998 Specific Plan. Under the No Project Alternative, redevelopment would occur on the project site under the existing 1998 Specific Plan and Zoning Ordinance. Therefore, *similar* impacts would also occur under both scenarios.

As described in Chapter 4.3, there are no riparian corridors; sensitive natural communities; or established wildlife corridors within or adjoining the project site. In addition, there are no riparian resources or sensitive natural communities within the greater Specific Plan Area; therefore, impacts to special-status species would be *similar* under both scenarios.

In summary, due to lack of biological resources under the existing conditions on the TOD #1 project site and because both the No Project Alternative and the TOD #1 project would occur on the same site, impacts to biological resources under the No Project Alternative would be *similar* when compared to the TOD #1 project.

### *Cultural Resources*

Chapter 4.4, Cultural Resources, finds that the proposed TOD #1 project would result in three significant-but-mitigable impacts, as it would have the potential to adversely affect historic buildings and structures or uncover unknown paleontological or archaeological resources. These impacts would be mitigated to less-than-significant levels through the implementation of Mitigation Measures CULT-TOD#1-1 through CULT-TOD#1-3. Redevelopment under the No Project Alternative would also involve infill development on the project site that could affect the same historic structures or unknown paleontological or archeological resources. Under the No Project Alternative these potential impacts would be *similar* when compared to the TOD #1 project.

Chapter 4.4 finds that applicable regulations, procedures, and policies would ensure that any human remains discovered during construction allowed by the proposed TOD#1 project would be handled appropriately. These regulations, procedures, and policies would also apply to future development under the No Project Alternative.

In summary, because both the No Project Alternative and the TOD #1 project would occur in the same area, the proposed TOD #1 project and the No Project Alternative would result in *similar* impacts to cultural resources.

### *Geology, Soils, and Seismicity*

Chapter 4.5, Geology and Soils, finds that development allowed by the TOD #1 project would result in significant-but-mitigable geology and soils impacts due to low risks for geologic hazards on the project site, coupled with existing applicable policies and building standards. There are no active faults within or adjacent to the TOD #1 project site, the potential for ground rupture, liquefaction, and unstable geologic units is considered low, and the generally flat terrain of the project site would limit landslide and erosion risks. New development would be subject to the California Building Code and the risk reduction policies in the City's General Plan that would address and prevent hazards associated with geology, soils, and seismicity. The recent geotechnical investigation of the TOD #1 project site concluded that "variable liquefaction settlement" was one of the two most significant geotechnical constraints on the project site. Mitigation Measure GEO-TOD#1-1 requires compliance with the

recommendations in the site-specific geotechnical investigation (see Appendix D, Geotechnical Data, of the Draft EIR). This mitigation would also apply to development under the No Project Alternative.

In summary, the existing conditions would be the same under both scenarios and the City's building standards and policies would also apply to new development allowed under the No Project Alternative. Therefore, the impacts related to geology and soils under the No Project Alternative would be *similar* to those under the TOD #1 project.

### *Greenhouse Gas Emissions*

As described in Chapter 4.6 of this Draft EIR, the proposed TOD #1 project would result in less-than-significant GHG emissions impacts.

The No Project Alternative would allow less retail and a hotel with up to 500 rooms, but no residential or office development would occur under the City's existing 1998 Specific Plan and Zoning Ordinance. Under the No Project Alternative, the reduced development would reduce impacts associated with the construction and operation of these uses. Reducing retail and eliminating office and residential near the Millbrae Station could result in a higher percentage of transit users that may rely on automobiles (as opposed to walking or biking) to and from the project site. Therefore, the No Project Alternative would not necessarily reduce trips to the project site as a result of reducing these types of land uses, which are the major source of GHG emissions from the TOD #1 project. However, because the No Project Alternative would result in less overall development than the proposed TOD #1 project, air quality impacts would from the operation of these uses would be *less*.

In summary, because the No Project Alternative proposes less development, than the TOD #1 project, GHG emissions impacts under the No Project Alternative would be *less* when compared to the TOD #1 project.

### *Hazards and Hazardous Materials*

Chapter 4.7, Hazards and Hazardous Materials, finds that the proposed TOD #1 project would result in less-than-significant hazards and hazardous materials impacts.

As described in Chapter 4.7, construction activities at the TOD #1 project site and operation of the proposed TOD #1 project would not involve the routine transport, use, and disposal of hazardous materials, and new development could involve the handling, use, and storage of hazardous materials. There are no listed hazardous materials sites within the TOD #1 project site. Existing regulations, procedures, and policies would ensure that impacts due to future development on the TOD #1 project site under the No Project Alternative are less than significant and that the potential accidental release of hazardous materials is prevented and handled appropriately. Therefore, impacts related to hazardous materials would be *similar* under both scenarios.

The TOD #1 project site is within areas of the San Francisco International Airport (SFO) Airport Land Use Compatibility Plan (ALUCP) that limits land use and building height to minimize impacts to people residing or working in on the TOD #1 project site. Development under both the TOD #1 project and the No Project Alternative would be required to be consistent with ALUCP's Policy AP-3, which establishes the procedures for determining the maximum compatible building height. Future development under the proposed TOD #1 project and the No Project Alternative would occur within SFO Safety Compatibility Zone 2, as shown in Figure 4.7-1,

and future development under the No Project Alternative would have to be compatible with Zone 2's applicable land use criteria. Neither the proposed TOD #1 project nor the No Project Alternative would subject people or structures to substantial airport related hazards.

As discussed in Chapter 4.7, the City has adopted ABAG's multi-jurisdictional Local Hazard Mitigation Plan for the San Francisco Bay Area, as modified for the City's Local Hazard Mitigation. Compliance with the provisions of the California Fire Code and the California Building Code would ensure that buildout of the proposed TOD #1 project and No Project Alternative would not interfere with an adopted emergency response plan or emergency evacuation plan and impacts would be *similar* under both scenarios.

In summary, the existing conditions would be the same under both scenarios and the federal, State and local regulatory standards would also apply to new development allowed under the No Project Alternative. Therefore, the hazards and hazardous materials impacts under the No Project Alternative would be *similar* to those under the TOD #1 project.

### *Hydrology and Water Quality*

Chapter 4.8, Hydrology and Water Quality, finds that the proposed TOD #1 project would result in less-than-significant hydrological impacts. Compliance with existing State and local regulations and procedures would ensure that pre- and post-construction impacts to water quality would be less than significant. These regulations and procedures would be maintained under the No Project Alternative.

The TOD #1 project site is highly urbanized, and development under either the proposed TOD #1 project or No Project Alternative would not rely on groundwater supplies or interfere with existing groundwater recharge.

The TOD #1 project site does not contain a stream, river, or other drainage facility, apart from the city's storm drain system. Development allowed by either the proposed TOD #1 project or the No Project Alternative would connect to the city's storm drain system and would not substantially change existing drainage patterns.

The TOD #1 project site is already built out with impervious surface and the proposed development should not significantly increase the amount of runoff from the site, especially with the requirement to implement C.3 stormwater control provisions. Since the TOD #1 project site is completely built out, the drainage areas and runoff coefficients under both the proposed TOD #1 project and No Project Alternative would remain similar to existing conditions.

No portions of the TOD #1 project site are within a flood zone and no residential development is proposed under the No Project Alternative. Therefore, housing and other structures allowed by either the proposed TOD #1 project or the No Project Alternative would not be constructed within a 100-year floodplain.

There are no mapped dam inundation areas within the city or within the TOD #1 project site. In addition, the TOD #1 project site is not within the mapped tsunami inundation area. Therefore, it will not be subject to flooding from a tsunami. There are no nearby reservoirs or aboveground storage tanks that could result in a seiche impacting the TOD #1 project site, and if a seiche were to occur in San Francisco Bay, it would not impact the TOD #1 project site, because the impact would not extend beyond the tsunami inundation zone.

In summary, impacts under the No Project Alternative would be *similar* when compared to the proposed TOD #1 project.

### *Land Use and Planning*

As discussed in Chapter 4.9, Land Use and Planning, the proposed TOD #1 project would result in one land use and planning impact with regards to height standard consistency with the Specific Plan Update. The proposed TOD #1 project would aim to improve connectivity and would not create physical barriers within existing communities. Similarly, the No Project Alternative supports the integration of the infill development and does not propose physical features that could divide a community.

The project site is within the *Plan Bay Area* Transit Station Area PDA where transit-oriented and infill development is encouraged. The No Project Alternative would not result in the development of residential uses on the TOD #1 project site and would develop hotel and retail uses, which would not be consistent with the goals of *Plan Bay Area* by focusing on mixed-use and TOD, providing better connectivity between the TOD #1 project site and adjacent land uses, and providing mixed-use development near the Millbrae Station. Furthermore, as discussed in Chapter 4.11, the TOD #1 project site is identified as a major housing site in the Housing Element in its planning horizon of 2015 to 2022, as well as being part of the Transit Station Area PDA; accordingly, the absence of residential units under this Alternative is not consistent with current growth projected on this site under Millbrae or ABAG standards. This Alternative would conflict with the goals of City's Housing Element and *Plan Bay Area;* therefore, impacts would be *greater* under the No Project Alternative than under the proposed TOD #1 project.

The project site is within the Safety Compatibility Zones 2 and 3 of the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (SFO ALCUP). Like the proposed TOD #1 project, the land uses under this alternative would be consistent with the SFO ALCUP.

BART's TOD Policy seeks to promote high quality, more intensive development on and near BART stations. The TOD #1 project is consistent with the TOD Policy because it would locate new housing, retail space, and office space in close proximity, and in some cases, immediately adjacent to the Millbrae Station, and because many of its future residents and employees would be expected to ride BART and/or Caltrain for commute or recreational trips instead of driving. However, the No Project Alternative would only locate new retail and hotel uses at the project site. While the future users of these land uses would also use BART and/or Caltrain for many trips, as under the TOD #1 project, the less intensive development without residential and office redevelopment under the No Project Alternative would not be consistent with these policies.

Under this Alternative, development would occur consistent with the 1998 Specific Plan and no height standard compliance impact would occur as under the proposed TOD #1 project and the Specific Plan Update.

In summary, the reduced height of the TOD #1 project under this alternative would eliminate the significant and unavoidable height standard compliance impact under the proposed TOD #1 project. However, given the environmental benefits (reduced VMT, air quality, greenhouse gas emission, and traffic congestion, and increased energy conservation) of high-density development near transit, the lack of residential mixed-use and TOD development on the TOD #1 project site inconsistency with the goals of *Plan Bay Area* and BART's TOD Policy, the No Project Alternative would have *greater* land use impact than the proposed TOD #1 project.

### *Noise*

Future development under the TOD #1 project and the No Project Alternative would be subject to the standards of the Municipal Code, including those relating to the interface between residential and non-residential land uses. Like the TOD #1 project, project-level design, permitting, and environmental review would serve to ensure that individual uses would comply with the provisions of the City's General Plan and Municipal Code under the No Project Alternative. Chapter 4.10, Noise, finds that the proposed TOD #1 project would result in less-than-significant impacts with implementation of Mitigation Measure NOISE-TOD#1-1 (interior), NOISE-TOD#1-2.1 (construction vibration) and NOISE-TOD#1-2.2 (railway vibration), NOISE-TOD#1-4 (construction), which reduce noise impacts to sensitive receptors. These same mitigation measures would apply to the No Project Alternative, with the exception of Mitigation Measure NOISE-TOD#1-1, which reduces interior noise impacts to residents, because no residential land uses are proposed under the No Project Alternative.

Compliance with relevant General Plan policies and provisions of the Municipal Code, including those that restrict construction activities to occur during daytime hours, would serve to ensure that noise from construction impacts and stationary noise sources associated with development of new land uses under the No Project Alternative would not result in significant permanent increases in the ambient noise level on the TOD #1 and vicinity.

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

In summary, because the No Project Alternative would result in less overall development and no residential development, noise impacts from the construction and operation of these uses would be *less* when compared to the TOD #1 project.

### *Population and Housing*

As discussed in Chapter 4.11, the proposed TOD #1 project would not exceed ABAG projections for housing and population in the Transit Station Area PDA, and employment growth expected from the proposed TOD #1 project would not exceed ABAG expected employment levels and would not directly induce unexpected population growth. Under the No Project Alternative, no new residential units would be built on the TOD #1 project site and no new residents would be generated. Accordingly, implementation of the No Project Alternative would not contribute to ABAG's population projections and would not exceed ABAG's population level. As previously stated under the Land Use and Planning discussion above, the TOD #1 project site is identified as a major housing site in the Housing Element in its planning horizon of 2015 to 2022; therefore, the loss of residential units on the project site under this Alternative is not consistent with current growth projected on this site under Millbrae or ABAG standards.

The 463 new jobs expected from the No Project Alternative represent about 36.5 percent of total expected employment growth for the city by 2020.[1] As with the proposed TOD #1 project, the No Project Alternative would not exceed ABAG expected employment levels (1,270 compared to 463) and would not directly induce unexpected population growth. Therefore, impacts under the No Project Alternative would be *similar* to those under the proposed TOD #1 project.

The No Project Alternative would allow a net increase of retail space and hotel uses on the TOD #1 project site. The TOD #1 project site has one housing unit that would be redeveloped to a mixed-use complex. While implementation of the No Project Alternative would not result in a net increase of housing, replacement housing outside the TOD #1 project site would not be required because there is adequate housing available in the Specific Plan Area and elsewhere in Millbrae to accommodate one displaced residence. Therefore, impacts under the No Project Alternative would be *similar* to those under the proposed TOD #1 project.

In summary, while the No Project Alternative would result in a different buildout potential, development under the No Project Alternative would result in *similar* impacts when compared to the proposed TOD #1 project.

### *Public Services and Recreation*

#### *Fire and Police Services*

As discussed in Chapter 4.12, the TOD #1 project's potential impacts associated with expansion of Central County Fire Department (CCFD) facilities would be less than significant. In addition, the TOD #1 project would not require additional Millbrae Police Bureau (MPB) or BART Police Department staffing or facilities. The No Project Alternative would generate fewer new residents and workers on the project site than the proposed TOD #1 project, and therefore, would result in fewer demands on the CCFD and the MPB or BART Police Department; thus, impacts would be *less*.

#### *Schools*

Development allowed by the No Project Alternative would include no new residential units; therefore, no new students would be generated for both the Millbrae Elementary School District (MESD) and San Mateo Union High School District (SMUHSD), and the No Project Alternative would not exacerbate enrollment issues faced by the MESD or SMUHSD. The No Project Alternative would result in no impact to the MESD or SMUHSD. Therefore, under the No Project Alternative impacts to schools would be *less* when compared to the proposed TOD #1 project.

#### *Libraries*

The proposed TOD #1 project would not require the physical expansion of library facilities. The No Project Alternative would not generate any residents and would generate fewer workers at the project site than the proposed TOD #1 project, and therefore impacts to SMCL facilities or resources would be *less*.

[1] ABAG projects 1,270 new jobs in Millbrae between 2010 and 2020. See Table 4.11-2 in Chapter 4.11, Population and Housing, of this Draft EIR.

### *Parks and Recreation*

In addition, the proposed TOD #1 project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered parks; would not result in substantial physical deterioration of existing neighborhood and regional parks or other recreational facilities; and would not include or require the construction or expansion of recreational facilities. The No Project Alternative would not generate any residents, and therefore impacts to city parks or recreational facilities would be *less*.

Overall, the No Project Alternative would result in less growth than the proposed TOD #1 project, and would therefore place less of an impact on public services and recreation. Therefore, impacts to public services and recreation under the No Project Alternative would be *less* when compared to the proposed TOD #1 project.

## *Transportation and Circulation*

As discussed in Chapter 4.13, Transportation and Circulation, of this Draft EIR, the proposed TOD #1 project would result in significant impacts at three intersections based on the City's intersection operations impact significance criteria. Even with implementation of mitigation measures, all but one would remain significant and unavoidable. In addition, the proposed TOD #1 project would result in a significant and unavoidable impact because it would add traffic to freeway segments that operate below the Caltrans standard.

Under the No Project Alternative, no office or residential, less retail and more hotel development would occur. The reduced retail and eliminated office and residential development would reduce trips and related congestion, but additional trips from hotel uses would occur. As discussed under Air Quality and Greenhouse Gas Emissions above, reducing development of these types of land uses in close proximity to the Millbrae Station could increase automobile trips to and from the Specific Plan Area, which could be offset by increasing the amount of development on the project site under the TOD #1 project, thus reducing trips from residents on the project site that could work on the project site or walk to the Millbrae Station rather than drive. Therefore, the No Project Alternative would not necessarily reduce the significant intersection or freeway segment impacts.

Chapter 4.13 finds that the proposed TOD #1 project would not conflict with adopted transportation policies, plans, or programs regarding bicycle and pedestrian facilities, and with public transit with implementation of Mitigation Measure TRANS-TOD#1-13. Under the No Project Alternative, future development would be required to comply with the City's adopted General Plan polices and Zoning performance standards to ensure adequate bicycle, pedestrian and public transit facilities would be provided; therefore, the No Project Alternative would have *similar* impacts.

Although the TOD #1 would increase parking demand, Chapter 4.13 finds the proposed TOD #1 project would provide adequate parking. Because the TOD #1 project is designed to be consistent with the Specific Plan Update that includes updated bicycle parking rates based on a sample of best practices conducted by the Association of Pedestrian and Bicycle Professionals and BART's 2002 *Bicycle Access and Parking Plan*, which is more representative of bicycle parking needs under current conditions than the City's existing Municipal Code, it provides more bicycle parking than would be required under the City's current standards. Nonetheless, the No Project Alternative would allow less development overall, which would reduce parking demands, and future development would be required to comply with the City's parking requirements; therefore, impacts would be *similar* under both scenarios.

Finally, through the City's comprehensive development review process and compliance with City Codes, the proposed TOD #1 project would avoid impacts related to inadequate emergency access and hazards, and it would not result in a change in air traffic patterns. Development allowed under the No Project Alternative would be subject to the same development review process and City Codes, and it would impact regional air travel at a smaller scale, so emergency access, and air traffic pattern impacts would also be less than those under the proposed TOD #1 project. Under the proposed TOD #1 project queuing hazards would occur due to traffic back-ups at two intersections; however, these intersections currently exceed available storage space. Accordingly, additional traffic from the No Project Alternative would also exacerbate this existing condition.

Overall, the development under the No Project Alternative would be less; therefore, traffic and circulation impacts would be *less* when compared to the proposed TOD #1 project.

### *Utilities and Service Systems*

#### *Water*

A Water Supply Assessment was prepared for the TOD #1 project to determine the increase in water demand and assess the available water supply's ability to meet the demands of the proposed TOD #1 project for normal, single dry, and multiple dry years. As discussed in Chapter 4.14, Utilities and Service Systems, there would not be sufficient water supplies available to serve the proposed TOD #1 project from existing entitlements and resources during multiple dry years. Because this is an existing condition, impacts would be the same under the No Project Alternative.

A discussed in Chapter 4.14, Millbrae adopted its 2010 UWMP on June 14, 2011, by Resolution No. 11-17.[2] The UWMP is a long-range planning document used to assess current and projected water usage, water supply planning and conservation and recycling efforts. The UWMP includes a Water Shortage Contingency Plan, described in Section 8 of the UWMP. Using the measures in the Water Shortage Contingency Plan to reduce the demands to the required supply availability, the UWMP estimates that Millbrae will have adequate supplies to meet demands during normal, single-dry, and multiple-dry years throughout the 25-year planning period of the UWMP (i.e. through 2035).

Improvements to the existing water distribution would be required to meet the future demands on the project site under the proposed TOD #1 project. Chapter 4.14, Utilities and Service Systems, finds that impacts associated with these improvements would be less than significant. Under the No Project Alternative, development under the 1998 Specific Plan would be maintained impacts under the No Project Alternative would also be reduced through compliance with mandatory regulations as described in Chapter 4.14.

Overall, because development would be less under the No Project Alternative, impacts to water supply would be *less* under the No Project Alternative when compared to the proposed TOD #1 project.

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

### *Wastewater*

As discussed in Chapter 4.14, improvements to the existing wastewater treatment would not be required in order to meet the demands of the TOD #1 project. Impacts to the collection system infrastructure would be less than significant with implementation of Mitigation Measure UTIL-TOD#1-6. The No Project Alternative would involve less development than the proposed TOD #1 project, and therefore, would result in less wastewater infrastructure needs. Improvements would still be needed to serve new development, but may be less extensive; thus, resulting in fewer impacts when compared to the proposed TOD #1 project.

Overall, wastewater impacts would be *less* under the No Project Alternative than when compared to the proposed TOD #1 project.

### *Solid Waste*

Solid waste from the TOD #1 project would be less than one percent of the daily capacity (i.e. 3,598 tons/day) of the Ox Mountain Landfill, which receives 99 percent of Millbrae's solid waste. The solid waste generated from the TOD #1 project is also less than one percent of the permitted daily capacity of the Recology Landfill, which has the smallest daily capacity (i.e. 2,400 tons/day) of any of the three landfills (along with Monterey Peninsula Landfill and Potrero Hills Landfill) that receive the remaining one percent of Millbrae's solid waste. In addition, compliance with the applicable regulations listed under UTIL-5 in Chapter 4.14 would ensure less-than-significant impacts associated with solid waste. Because the No Project Alternative would result in less development and overall growth than the proposed TOD #1 project, it would generate less solid waste, and impacts would be *less* when compared to the proposed TOD #1 project.

Overall, solid waste impacts would be *less* under the No Project Alternative than when compared to the proposed TOD #1 project.

### *Energy Conservation*

Even with energy saving practices in place, new electrical connections, switches and/or transformers might be required to serve new structures and/or carry additional loads within the TOD #1 project site under the No Project Alternative. Similarly, new gas distribution lines and connections may be necessary. However, due to the TOD #1 project's size and location within an urban development, buildout of the No Project Alternative would not significantly increase energy demands within the service territory and would not require new energy supply facilities. Compliance with the applicable General Plan Policies would ensure that energy impacts from transportation would be less than significant under both scenarios. The No Project Alternative would be constructed using energy efficient modern building materials, construction practices, and appliances and equipment, and would have to comply with the applicable General Plan policies and CALGreen Building Code and the other applicable state and local energy efficiency measures. This would ensure that significant energy conservation and savings would be realized from future development under the No Project Alternative. Because the No Project Alternative would result in less growth than the proposed TOD #1 project, impacts under this Alternative would be *less* than those of the proposed TOD #1 project.

Overall, energy related impacts would be *less* under the No Project Alternative than when compared to the proposed TOD #1 project.

### Relationship of the Alternative to the Objectives

As previously stated, the primary intent of the proposed TOD #1 project is to develop a high-quality mixed-use development on the TOD #1 project site. Under the TOD #1 project objectives, the type of mixed-use development should include Class A office, retail and high-density residential units for current and future residents and employees desiring to reside and work in a transit friendly environment in Millbrae with convenient transit connectivity to the larger Bay Area. This alternative would also not be consistent with the *Plan Bay Area* PDA, which is intended to encourage high density new development in close proximity to transit nodes that will help to reduce GHG emissions through a reduction in vehicle trips. Accordingly, because the No Project Alternative would continue to maintain the 1998 Specific Plan, which includes retail and hotel land uses only, it would not meet the overall intent of the proposed TOD #1 project.

## 5.2.3.2 LOWER INTENSITY ALTERNATIVE

### Description

Under this Lower Intensity Alternative, the mix of land uses would generally remain the same as what is proposed in the TOD #1 project; however, as shown in Table 5.2-2, the overall development assumed for the TOD #1 project site would be reduced by 30 percent from what is assumed in the proposed TOD #1 project and a hotel component would be added. Although no specific maximum height has been determined for this Alternative, it is assumed that the maximum height permitted under this Alternative would be less than the proposed TOD #1 project because the reduced development potential would not require as much height. Therefore, this Alternative could be accommodated within a 108- to 120-foot height range, which is the maximum height range identified in the Specific Plan Update.

The Lower Intensity Alternative would be developed under the Specific Plan Update's proposed land use and urban design concepts, and overall goals, polices and development standards.

The federal and State Regulations, General Plan policies, and Municipal Code development standards that apply to the proposed TOD #1 project, would also apply to this Alternative, and all mitigation measures listed in Chapters 4.1 through 4.14 would also apply to their respective impacts under this Alternative.

As with the No Project Alternative, even if no action were taken on the TOD #1 project, regional growth, and the associated environmental effects linked to this growth, would continue to occur under the provisions of the current 1998 Specific Plan.

### Impact Discussion

The potential environmental impacts associated with the Lower Intensity Alternative are described below and are compared to the TOD #1 project. The impacts of the alternative are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the proposed TOD #1 project.

### *Aesthetics*

Chapter 4.1, Aesthetics, finds that the proposed TOD #1 project would result in less-than-significant impacts to aesthetics. As described in detail in Section 4.1.1.2, Existing Conditions, in Chapter 4.1, Aesthetics, of this Draft EIR, the TOD #1 project site is concentrated on parcels within the current Specific Plan Area in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development, where future development would have a lesser impact on scenic vistas. Additionally, the topography of TOD #1 project site is essentially flat and the views from street-level public viewing to surrounding scenic vistas are currently inhibited by the existing buildings, structures, and mature trees/vegetation.

Under the Lower Intensity Alternative, the proposed TOD #1 project would be constructed with office, retail and residential land uses, but at a reduced rate. Accordingly, the maximum height of the buildings under the TOD #1 project would be reduced under this Alternative, which would somewhat lessen the impacts to far-field views of the scenic vistas from various vantage points surrounding the TOD #1 project site. Furthermore, same as the proposed TOD #1 project, development under the Lower Intensity Alternative would be subject to the policies of the General Plan, the Specific Plan Update (once adopted), and the Municipal Code development standards that would ensure development on the project site would protect views of scenic vistas. Considering these regulations and the fact that the project site and surrounding roadways are not considered destination public viewing points nor are they visible from surrounding scenic vistas, overall impacts to scenic vistas would be *similar* under both scenarios.

As with the proposed TOD #1 project, development under the Lower Intensity Alternative would represent a change to the existing visual character, but would not substantially degrade the existing visual character or quality of the surroundings. As discussed in Chapter 4.1, the surrounding area to the east, south and west exhibits a similar built environment as the proposed TOD #1 project and the Lower Intensity Alternative. Any development on the project site would be required to comply with General Plan Policy H2.9, which requires the protection of the character of existing residential neighborhoods. Compliance with this policy would ensure the visual quality of the surrounding area would be protected. Development under the Lower Intensity Alternative, like the proposed TOD #1 project, would be subject to the City's Design Review process and to existing General Plan policies identified in Table 4.1-1 in Chapter 4.1, that aim to protect the visual character of Millbrae. In particular, Policy LU2.1 requires quality site planning, architecture and landscape design for all new development, renovation or remodeling. Compliance with these regulations would reduce visual inconsistency and promote design that is complementary to and harmonious with adjacent properties and the surrounding area. Accordingly, impacts would be *similar* under both scenarios.

The project site and surrounding area is almost fully developed with various uses, including an on-site vacant lumber yard, warehouse, and nursing facility, and adjacent Millbrae Station, surface parking lots and parking structure, commercial, industrial, and multi-family residential mixed-use. Future development under the Lower Intensity Alternative would replace existing low-rise buildings with medium- to high-rise buildings, adding new sources of light, such as exterior lighting, indoor lighting, and safety lighting. In addition to compliance with City's Design Review process, and General Plan, the City has adopted the California Building Code per Municipal Code Section 9.05.010, which includes standards for outdoor lighting that are intended to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls. Like the proposed TOD #1 project, the Lower Intensity Alternative's interior and exterior lighting would be consistent with the urbanized context of the

project site and surrounding area and impacts from substantial light and glare such that could degrade daytime or nighttime views, or pose a hazard to drivers on nearby roadways would be *similar* under both scenarios.

In summary, Chapter 4.1 finds that potential impacts from future development under the TOD #1 project would be avoided through consistency with General Plan policies and Zoning Ordinance performance standards that would also apply to new development under the Lower Intensity Alternative. Under both scenarios, future projects would be subject to the City's Design Review process. In addition, development on the TOD #1 project site under the Lower Intensity Alternative would be required to comply with the Specific Plan Update (once adopted). Therefore, potential aesthetics impacts under the Lower Intensity Alternative would be *similar* when compared to the TOD #1 project.

### *Air Quality*

As described in Chapter 4.2, Air Quality, the proposed TOD #1 project would result in seven significant and unavoidable impacts, and one significant-but-mitigable impact with the implementation of Mitigation Measure AQ-TOD#1-2.1 (construction impacts).

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

The Lower Intensity Alternative would allow less office, retail and residential on the project site. Under the Lower Intensity Alternative, the reduced development would reduce impacts associated with the construction and operation of these land uses. Additionally, Mitigation Measures AQ-TOD#1-2.1 (construction impacts) and AQ-TOD#1-4.1a (construction impacts) and AQ-TOD#1-4.1b (construction health risk assessment), which would reduce air quality impacts, would also apply to the development under the Lower Intensity Alternative.

Reducing development near the Millbrae Station could result in a higher percentage of transit users that may rely on automobiles (as opposed to walking or biking) to and from the project site. Therefore, the Lower Intensity Alternative would not necessarily reduce trips to the project site as a result of reducing these types of development, which are the major source of criteria air pollutants from the TOD #1 project. However, because the Lower Intensity Alternative would result in less overall development than the proposed TOD #1 project, air quality impacts would from the operation of these uses would be less.

Due to the proximity of the project site to high-volume roadways and potentially other stationary sources, on-site sensitive receptors under both the proposed TOD #1 project and the Lower Intensity Alternative could potentially

be exposed to TAC concentration. Mitigation Measure AQ-TOD#1-4.2 (health risk assessment), which requires and evaluation of the health risk impacts of all major sources of TACs within 1,000 feet of the project site and measures to reduce any potential risks, would apply to both the TOD #1 project and the Lower Intensity Alternative; therefore, impacts would be similar under both scenarios.

Same as the proposed TOD #1 project, the Lower Intensity Alternative is not the type of project that would result in significant impacts from odor and impacts would be similar under both scenarios.

Overall, because the Lower Intensity Alternative would result in less development, air quality impacts under the Lower Intensity Alternative would be *less* than those under the TOD #1 project.

### *Biological Resources*

As discussed in Chapter 4.3, Biological Resources, the project site is built out and urbanized, which greatly limits the likelihood of continued occurrence of most special-status plant and animal species. However, redevelopment under the proposed TOD #1 project and the Lower Intensity Alternative would have the potential to adversely affect pallid bats, a special-status species that roosts in crevices and abandoned buildings, as well as one or more species of birds protected under the Migratory Bird Treaty Act and State Fish and Game Code. This impact would be mitigated to a less-than-significant level through the implementation of Mitigation Measures BIO-TOD#-1.1 and BIO-TOD#1-1.2, which would also apply to development under Lower Intensity Alternative. Under the Lower Intensity Alternative, redevelopment would occur on the same project site; therefore, similar impacts would also occur under both scenarios.

As described in Chapter 4.3, there are no riparian corridors; sensitive natural communities; or established wildlife corridors within or adjoining the project site. In addition, there are no riparian resources or sensitive natural communities within the greater Specific Plan Area; therefore, impacts to special-status species would be *similar* under both scenarios.

In summary, due to lack of biological resources under the existing conditions on the TOD #1 project site and because both the Lower Intensity Alternative and the TOD #1 project would occur on the same site, impacts to biological resources under the Lower Intensity Alternative would be *similar* when compared to the TOD #1 project.

### *Cultural Resources*

Chapter 4.4, Cultural Resources, finds that the proposed TOD #1 project would result in three significant-but-mitigable impacts, as it would have the potential to adversely affect historic buildings and structures or uncover unknown paleontological or archaeological resources. These impacts would be mitigated to less-than-significant levels through the implementation of Mitigation Measures CULT-TOD#1-1 through CULT-TOD#1-3. Redevelopment under the Lower Intensity Alternative would also involve infill development on the project site that could affect the same historic structures or unknown paleontological or archeological resources. Therefore, impacts would be *similar* under both scenarios.

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

In summary, because both the Lower Intensity Alternative and the Specific Plan Update would occur in the same area, the proposed TOD #1 project and the Lower Intensity Alternative would result in *similar* impacts to cultural resources.

### *Geology, Soils, and Seismicity*

Chapter 4.5, Geology and Soils, finds that development allowed by the TOD #1 project would result in significant-but-mitigable geology and soils impacts due to low risks for geologic hazards on the project site, coupled with existing applicable policies and building standards. There are no active faults within or adjacent to the TOD #1 project site, the potential for ground rupture, liquefaction, and unstable geologic units is considered low, and the generally flat terrain of the project site would limit landslide and erosion risks. New development would be subject to the California Building Code and the risk reduction policies in the City's General Plan that would address and prevent hazards associated with geology, soils, and seismicity. The recent geotechnical investigation of the TOD #1 project site concluded that "variable liquefaction settlement" was one of the two most significant geotechnical constraints on the project site. Mitigation Measure GEO-TOD#1-1 requires compliance with the recommendations in the site-specific geotechnical investigation (see Appendix D, Geotechnical Data, of the Draft EIR). This mitigation would also apply to development under the Lower Intensity Alternative.

In summary, the existing conditions would be the same under both scenarios and the City's building standards and policies would also apply to new development allowed under the Lower Intensity Alternative. Therefore, the impacts related to geology and soils under the Lower Intensity Alternative would be *similar* to those under the TOD #1 project.

### *Greenhouse Gas Emissions*

As described in Chapter 4.6 of this Draft EIR, the proposed TOD #1 project would result in less-than-significant GHG emissions impacts.

The Lower Intensity Alternative would result in less office, retail and residential on the TOD #1 project site. Under the Lower Intensity Alternative, the reduced office, retail and residential development would reduce GHG emissions associated with the construction and operation of these uses. However, as described under the Air Quality discussion above, reducing these land uses near the Millbrae Station would not necessarily reduce automobile trips. Therefore, the Lower Intensity Alternative would not necessarily reduce GHG emissions from automobile trips from the TOD #1 project.

In summary, because the Lower Intensity Alternative proposes less development, than the TOD #1 project, GHG emissions impacts under the Lower Intensity Alternative would be *less* when compared to the TOD #1 project.

### *Hazards and Hazardous Materials*

Chapter 4.7, Hazards and Hazardous Materials, finds that the proposed TOD #1 project would result in less-than-significant hazards and hazardous materials impacts.

As described in Chapter 4.7, construction activities at the TOD #1 project site and operation of the proposed TOD #1 project would not involve the routine transport, use, and disposal of hazardous materials, and new development could involve the handling, use, and storage of hazardous materials. There are no listed hazardous materials sites within the TOD #1 project site. Existing regulations, procedures, and policies would ensure that impacts due to future development on the TOD #1 project site under the Lower Intensity Alternative are less than significant and that the potential accidental release of hazardous materials is prevented and handled appropriately. Therefore, impacts related to hazardous materials would be *similar* under both scenarios.

The TOD #1 project site is within areas of the SFO ALUCP that limit land use and building height to minimize impacts to people residing or working in on the TOD #1 project site. Development under both the TOD #1 project and the Lower Intensity Alternative would be required to be consistent with ALUCP's Policy AP-3, which establishes the procedures for determining the maximum compatible building height. Future development under the proposed TOD #1 project and the Lower Intensity Alternative would occur within SFO Safety Compatibility Zone 2, as shown in Figure 4.7-1, and future development under the Lower Intensity Alternative would have to be compatible with Zone 2's applicable land use criteria. Neither the proposed TOD #1 project nor the Lower Intensity Alternative would subject people or structures to substantial airport related hazards.

As discussed in Chapter 4.7, the City has adopted ABAG's multi-jurisdictional Local Hazard Mitigation Plan for the San Francisco Bay Area, as modified for the City's Local Hazard Mitigation. Compliance with the provisions of the California Fire Code and the California Building Code would to ensure that buildout of the proposed TOD #1 project and Lower Intensity Alternative would not interfere with an adopted emergency response plan or emergency evacuation plan and impacts would be similar under both scenarios.

In summary, the existing conditions would be the same under both scenarios and the federal, State and local regulatory standards would also apply to new development allowed under the Lower Intensity Alternative. Therefore, the hazards and hazardous materials impacts under the Lower Intensity Alternative would be *similar* to those under the TOD #1 project.

### *Hydrology and Water Quality*

Chapter 4.8, Hydrology and Water Quality, finds that the proposed TOD #1 project would result in less-than-significant hydrological impacts. Compliance with existing State and local regulations and procedures would ensure that pre- and post-construction impacts to water quality would be less than significant. These regulations and procedures would be maintained under the Lower Intensity Alternative.

The TOD #1 project site is highly urbanized, and development under either the proposed TOD #1 project or Lower Intensity Alternative would not rely on groundwater supplies or interfere with existing groundwater recharge.

The TOD #1 project site does not contain a stream, river, or other drainage facility, apart from the city's storm drain system. Development allowed by either the proposed TOD #1 project or the Lower Intensity Alternative would connect to the city's storm drain system and would not substantially change existing drainage patterns.

The TOD #1 project site is already built out with impervious surface and the proposed development should not significantly increase the amount of runoff from the site, especially with the requirement to implement C.3 stormwater control provisions. Since the TOD #1 project site is completely built out, the drainage areas and runoff coefficients under both the proposed TOD #1 project and Lower Intensity Alternative would remain similar to existing conditions.

No portions of the TOD #1 project site are within a flood zone. Therefore, housing and other structures allowed by either the proposed TOD #1 project or the Lower Intensity Alternative would not be constructed within a 100-year floodplain.

There are no mapped dam inundation areas within the city or within the TOD #1 project site. In addition, the TOD #1 project site is not within the mapped tsunami inundation area. Therefore, it will not be subject to flooding from a tsunami. There are no nearby reservoirs or aboveground storage tanks that could result in a seiche impacting the TOD #1 project site, and if a seiche were to occur in San Francisco Bay, it would not impact the TOD #1 project site, because the impact would not extend beyond the tsunami inundation zone.

In summary, impacts under the Lower Intensity Alternative would be *similar* when compared to the proposed TOD #1 project.

### *Land Use and Planning*

As discussed in Chapter 4.9, Land Use and Planning, the proposed TOD #1 project would result in no land use and planning impacts. The proposed TOD #1 project would aim to improve connectivity and would not create physical barriers within existing communities. Similarly, the Lower Intensity Alternative supports the integration of the infill development and does not propose physical features that could divide a community.

The project site is within the *Plan Bay Area* Transit Station Area PDA where transit-oriented and infill development is encouraged. The TOD #1 project is consistent with the goals of *Plan Bay Area* by focusing on mixed-use and TOD, providing better connectivity between the TOD #1 project site and adjacent land uses, and providing intensive mixed-use development near the Millbrae Station. New development allowed under the Lower Intensity Alternative would also redevelop the project site with transit-supportive uses; however, the reduced development under the Lower Intensity Alternative would not provide the same intensive development and therefore, would be less consistent with these goals.

The project site is within the Safety Compatibility Zones 2 and 3 of the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (SFO ALCUP). Like the proposed TOD #1 project, the land uses under this alternative would be consistent with the SFO ALCUP, including the addition of the hotel.

BART's TOD Policy seeks to promote high quality, more intensive development on and near BART stations. The TOD #1 project is consistent with the TOD Policy because it would locate new housing, retail space, and office

space in close proximity, and in some cases, immediately adjacent to the Millbrae Station, and because many of its future residents and employees would be expected to ride BART and/or Caltrain for commute or recreational trips instead of driving. Similarly, the Lower Intensity Alternative would locate the same mix of uses at this site; however, the less intensive development without as much residential development under the Lower Intensity Alternative would be less consistent with these policies.

Under this Alternative, development would occur consistent with the Specific Plan Update and no height standard compliance impact would occur as under the proposed TOD #1 project and the Specific Plan Update. Therefore, this Alternative would eliminate the project's significant and unavoidable impact.

In summary, while the Lower Intensity Alternative's reduced level of development would not be as consistent with the goals and polices of *Plan Bay Area* or the BART TOD polices that support more "intensive" development on and near transit stations, the project would be consistent with the height standards of the Specific Plan Update, therefore, the land use consistency impacts under the Lower Intensity Alternative would be *less* when compared to those under the TOD #1 project.

### *Noise*

Future development under the TOD #1 project and the Lower Intensity Alternative would be subject to the standards of the Municipal Code, including those relating to the interface between residential and non-residential land uses. Like the TOD #1 project, project-level design, permitting, and environmental review would serve to ensure that individual uses would comply with the provisions of the City's General Plan and Municipal Code under the Lower Intensity Alternative. Chapter 4.10, Noise, finds that the proposed TOD #1 project would result in less-than-significant impacts with implementation of Mitigation Measure NOISE-TOD#1-1 (interior), NOISE-TOD#1-2.1 (construction vibration) and NOISE-TOD#1-2.2 (railway vibration), NOISE-TOD#1-4 (construction), which reduce noise impacts to sensitive receptors. These same mitigation measures would apply to the Lower Intensity Alternative; therefore, impacts would be similar under both scenarios.

Compliance with relevant General Plan policies and provisions of the Municipal Code, including those that restrict construction activities to occur during daytime hours, would serve to ensure that noise from construction impacts and stationary noise sources associated with development of new land uses under the No Project Alternative would not result in significant permanent increases in the ambient noise level on the TOD #1 and vicinity.

The project site falls within the SFO ALUCP area. With the exception of the area southwest of El Camino Real, the entire Specific Plan Area is within at least the 65 dBA CNEL Airport Noise Contour, according to Map 7-1, Noise Contours, in the Noise Element of the General Plan. Through the implementation of the applicable federal, State and General Plan polices and Municipal Code performance standards related to airport noise, the Lower Intensity Alternative would seek to minimize aircraft noise levels to the maximum extent feasible.

In summary, noise related impacts from development under the Lower Intensity Alternative would be *less* when compared to the proposed TOD #1 project, due to overall less development and shorter construction time frames.

### *Population and Housing*

As discussed in Chapter 4.11, the Specific Plan Update would not exceed ABAG projections for housing and population in the Transit Station Area PDA, and employment growth expected from the TOD #1 project would support the ABAG policies and the City's General Plan Policy LU3.7 regarding a jobs/housing balance. The 928 new residents expected from the Lower Intensity Alternative represent about 71 percent of ABAG's population projection for the city by 2020.[3] Implementation of the Lower Intensity Alternative could generate as many as 350 new housing units upon buildout. Accordingly, implementation of the Lower Intensity Alternative would not exceed ABAG's projection for the Transit Station Area PDA, which will accommodate 2,420 housing units between 2010 and 2040. Overall, the additional housing units and population resulting from implementation of the Lower Intensity Alternative would not exceed regional projections.

ABAG projects an increase of 1,270 jobs in Millbrae by the year 2020.[4] The Lower Intensity Alternative is expected to result in 1,027 jobs, which would be new jobs in Millbrae. These new jobs would not exceed the regional job projections. As with the TOD #1 project, this additional growth under the Lower Intensity Alternative would be consistent with the regional planning objectives established for the Bay Area. Therefore, impacts under the Lower Intensity Alternative would be *similar* to those under the TOD #1 project.

As previously discussed under the No Project Alternative, the Lower Intensity Alternative would result in a net increase in housing, it would not require replacement housing outside the Specific Plan Area in the event that the single on-site housing unit is displaced. Therefore, impacts under the Lower Intensity Alternative would be *similar* to those under the TOD #1 project.

In summary, while the Lower Intensity Alternative would result in a different buildout potential when compared to the proposed TOD #1 project, impacts related to population and housing would be *similar* when compared to the TOD #1 project.

### *Public Services and Recreation*

#### *Fire and Police Services*

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

#### *Schools*

Buildout of the Lower Intensity Alternative would result in 350 residential units.

[3] ABAG projects 2,668 new residents in Millbrae between 2010 and 2020. See Table 4.11-2 in Chapter 4.11, Population and Housing, of this Draft EIR.

[4] ABAG projects 1,270 new jobs in Millbrae between 2010 and 2020. See Table 4.11-2 in Chapter 4.11, Population and Housing.

Applying MESD student generation rates of 0.4 students per household for grades kindergarten to 6th grade (K-6), and 0.1 students per household for 7th to 8th grade, this alternative would be expected to generate approximately 140 students in K-6th grade and 35 students in 7th and 8th grade, compared to 200 K-6 grade and 50 7th through 8th grade students under the TOD #1 project,[5] in the MESD. Applying a SMUHSD student generation rate of 0.2 students per unit, this alternative would generate approximately 70 new high school students, compared to 100 new high school students[6] under the TOD #1 project.

Like development of the proposed TOD #1 project, the Lower Intensity Alternative would be subject to development impact fees in accordance with the provisions of SB 50, as well as parcel taxes. The payment of development impact fees is deemed to fully mitigate the impacts of new development on school facilities, per California Government Code Section 65995.

In summary, while future development under each scenario would be required to pay development impact fees to fully mitigate impacts to schools, the Lower Intensity Alternative would generate less residential growth and subsequently fewer students, and impacts would be *less* when compared to the proposed TOD #1 project.

### *Libraries*

The proposed TOD #1 project would not require the physical expansion of library facilities. The Lower Intensity Alternative would generate fewer new residents; thus, fewer primary users of the library, e.g. families with children, would result on the TOD #1 project site than under the proposed TOD #1 project. Therefore, fewer demands on would be placed on the San Mateo County Library (SMCL) facilities or resources under the Lower Intensity Alterative and impacts would be *less* when compared to the proposed TOD #1 project.

### *Parks and Recreation*

In addition, the proposed TOD #1 project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered parks; would not result in substantial physical deterioration of existing neighborhood and regional parks or other recreational facilities; and would not include or require the construction or expansion of recreational facilities. The Lower Intensity Alternative would generate fewer residents; thus, fewer primary users of the parks, e.g. families with children, on the project site than the proposed TOD #1 project. Therefore, fewer demands on would be placed on the city park and recreational facilities under the Lower Intensity Alterative and impacts would be *less* when compared to the proposed TOD #1 project.

In summary, the Lower Intensity Alternative would place fewer demands on the public service providers to Millbrae; therefore, impacts under the Lower Intensity Alternative would be *less* when compared to the proposed TOD #1 project.

[5] 500 units x 0.4 grades K-6th students per unit = 200 students. 500 units x 0.1 7th to 8th grade students = 50 students.

[6] 500 units x 0.2 high school students per unit = 100 students

### *Transportation and Circulation*

As discussed in Chapter 4.13, Transportation and Circulation, of this Draft EIR, the proposed TOD #1 project would result in significant impacts at three intersections based on the City's intersection operations impact significance criteria. Even with implementation of mitigation measures, all but one would remain significant and unavoidable. In addition, the proposed TOD #1 project would result in a significant and unavoidable impact because it would add traffic to freeway segments that operate below the Caltrans standard.

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

Chapter 4.13 finds that the proposed TOD #1 project would not conflict with adopted transportation policies, plans, or programs regarding bicycle and pedestrian facilities, and with public transit with implementation of Mitigation Measure TRANS-TOD#1-13. The proposed TOD #1 project, like the Lower Intensity Alternative would comply with the Specific Plan Update once adopted. The Specific Plan Update contains policies supporting transit that are consistent with those in the General Plan; it also includes infrastructure improvements that encourage and anticipate increased transit use. Similarly, the Specific Plan Update proposes substantial improvements to pedestrian and bicycle infrastructure, which would be implemented under the Lower Intensity Alternative. Therefore, the Lower Intensity Alternative would have *similar* impacts when compared to the proposed TOD #1 project.

Although the TOD #1 would increase parking demand, Chapter 4.13 finds the proposed TOD #1 project would provide adequate parking. Because the TOD #1 project and the Lower Intensity Alternative would be required to be consistent with the Specific Plan Update, which includes updated bicycle parking rates that are more representative of bicycle parking needs under current conditions than the City's existing Municipal Code, development under each scenario would provide more bicycle parking than would be required under the City's current standards. While, the Lower Intensity Alternative would allow less development overall, which would reduce parking demands, impacts would be *similar* under both scenarios.

Finally, through the City's comprehensive development review process and compliance with City Codes, the proposed TOD #1 project would avoid impacts related to inadequate emergency access and hazards, and it would not result in a change in air traffic patterns. Development allowed under the Lower Intensity Alternative would be subject to the same development review process and City Codes, and it would impact regional air travel at a reduced scale, so emergency access, and air traffic pattern impacts would be less than those under the proposed TOD #1 project. Under the proposed TOD #1 project queuing hazards would occur due to traffic back-ups at two intersections; however, these intersections currently exceed available storage space. Accordingly, additional traffic from the Lower Intensity Alternative would also exacerbate this existing condition.

Overall, the Lower Intensity Alternative would have *less* transportation and circulation impacts when compared to the proposed TOD #1 project.

### *Utilities and Service Systems*

#### *Water*

A Water Supply Assessment was prepared for the TOD #1 project to determine the increase in water demand and assess the available water supply's ability to meet the demands of the proposed TOD #1 project for normal, single dry, and multiple dry years. As discussed in Chapter 4.14, Utilities and Service Systems, there would not be sufficient water supplies available to serve the proposed TOD #1 project from existing entitlements and resources during multiple dry years. Because this is an existing condition, impacts would be the same under the Lower Intensity Alternative.

A discussed in Chapter 4.14, Millbrae adopted its 2010 UWMP on June 14, 2011, by Resolution No. 11-17.[7] The UWMP is a long-range planning document used to assess current and projected water usage, water supply planning and conservation and recycling efforts. The UWMP includes a Water Shortage Contingency Plan, described in Section 8 of the UWMP. Using the measures in the Water Shortage Contingency Plan to reduce the demands to the required supply availability, the UWMP estimates that Millbrae will have adequate supplies to meet demands during normal, single-dry, and multiple-dry years throughout the 25-year planning period of the UWMP (i.e. through 2035).

Improvements to the existing water distribution would be required to meet the future demands on the project site under the under the proposed TOD #1 project. Chapter 4.14, Utilities and Service Systems, finds that impacts associated with these improvements would be less than significant. Under the Lower Intensity Alternative, like the proposed Specific Plan Update, future development would be required to comply with mandatory regulations as described in Chapter 4.14 and impacts would be *similar*.

In summary, impacts to water supply under the Lower Intensity Alternative would be *less* than those under the TOD #1 project even with the addition of the hotel due to the reduce development potential.

#### *Wastewater*

As discussed in Chapter 4.14, improvements to the existing wastewater treatment would not be required in order to meet the demands of the TOD #1 project. Impacts to the collection system infrastructure would be less than significant with implementation of Mitigation Measure UTIL-TOD#1-6. The Lower Intensity Alternative would involve less development than the proposed TOD #1 project, and therefore, would result in less wastewater infrastructure needs. Improvements would still be needed to serve new development, but may be less extensive; thus, resulting in fewer impacts when compared to the proposed TOD #1 project.

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

Overall, wastewater impacts would be *less* under Lower Intensity Alternative than when compared to the proposed TOD #1 project.

### *Solid Waste*

Solid waste from the TOD #1 project would be less than one percent of the daily capacity (i.e. 3,598 tons/day) of the Ox Mountain Landfill, which receives 99 percent of Millbrae's solid waste. The solid waste generated from the TOD #1 project is also less than one percent of the permitted daily capacity of the Recology Landfill, which has the smallest daily capacity (i.e. 2,400 tons/day) of any of the three landfills (along with Monterey Peninsula Landfill and Potrero Hills Landfill) that receive the remaining one percent of Millbrae's solid waste. In addition, compliance with the applicable regulations listed under UTIL-5 in Chapter 4.14 would ensure less-than-significant impacts associated with solid waste. Because the Lower Intensity Alternative would result in less development and overall growth than the proposed TOD #1 project, it would generate less solid waste, and impacts would be *less* when compared to the proposed TOD #1 project.

Overall, solid waste impacts would be *less* under the Lower Intensity Alternative than when compared to the proposed TOD #1 project.

### *Energy Conservation*

Even with energy saving practices in place, new electrical connections, switches and/or transformers might be required to serve new structures and/or carry additional loads within the TOD #1 project site under the Lower Intensity Alternative. Similarly, new gas distribution lines and connections may be necessary. However, due to the proposed TOD #1 project's size and location within an urban development, buildout of the Lower Intensity Alternative would not significantly increase energy demands within the service territory and would not require new energy supply facilities. Transportation design features that are priorities of the Specific Plan Update would be implemented under the Lower Intensity Alternative, same as the proposed TOD #1 project, and ongoing, compliance with the applicable General Plan policies would be required to reduce energy impacts from transportation. New developments would be constructed using energy efficient modern building materials, construction practices, and appliances and equipment, and would have to comply with the applicable General Plan policies and CALGreen Building Code and the other applicable state and local energy efficiency measures. This would ensure that significant energy conservation and savings would be realized from future development under the Lower Intensity Alternative. Because the Lower Intensity Alternative would result in less growth than the proposed TOD #1 project, it would use less energy.

Overall, energy related impacts under the Lower Intensity Alternative, would be *less* when compared to those under the proposed TOD #1 project.

## Relationship of the Alternative to the Objectives

As previously stated, the primary intent of the proposed TOD #1 project is to develop a high-quality mixed-use development on the TOD #1 project site. Under the TOD #1 project objectives, the type of mixed-use development should include Class A office, retail and high-density residential units for current and future residents and employees desiring to reside and work in a transit friendly environment in Millbrae with convenient transit

connectivity to the larger Bay Area. The Lower Intensity Alternative would include these types of land uses but at a reduced level; therefore, this Alternative would generally meet the primary intent of the TOD #1 project. However, this alternative would not meet the project's objective to be consistent with the *Plan Bay Area* Transit Station Area PDA, which is intended to encourage high density new development in close proximity to transit nodes that will help to reduce GHG emissions through a reduction in vehicle trips. The reduced residential development under this Alternative would not provide the same level of high-density housing proposed under the project (500 units compared to 350 units).

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