6. CEQA-Mandated Assessment

This chapter provides an overview of the impacts of the proposed Specific Plan Update, Transit-Oriented Developments (TOD) #1 and #2 (together referred to as the "proposed Project") based on the analyses presented in Chapters 4 through 5 of this Draft EIR. The topics covered in this chapter include impacts found not to be significant, growth inducement, significant and unavoidable impacts, and significant irreversible changes. A more detailed analysis of the effects the proposed Project would have on the environment and proposed mitigation measures to minimize significant impacts are provided in Chapters 4.1 through 4.14.

6.1 IMPACTS FOUND NOT TO BE SIGNIFICANT

The California Environmental Quality Act (CEQA) Guidelines Section 15128 allows environmental issues, for which there is no likelihood of significant impact to be briefly discussed and not analyzed further in the EIR. This section explains the reasoning by which it was determined that impacts to agricultural and forestry resources, and mineral resources potentially resulting from buildout of the proposed Project would be less than significant.

- **Agricultural and Forestry Resources.** The Specific Plan Area does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as mapped by the Farmland Mapping and Monitoring Program, nor does it contain any parcels under a Williamson Act contract. In addition, the Specific Plan Area is not currently zoned for forest land or timberland. Therefore, the proposed Project would have no impact on agriculture and forestry resources.
- **Mineral Resources.** Lead agencies are required to incorporate identified Aggregate and Mineral Resource Zones (MRZs) delineated by the State into their General Plans.[1] The Millbrae General Plan does not contain any mineral resource land uses. The Specific Plan Area does not contain any known mineral resources or mineral extraction operations. Therefore, the proposed Project would have no impact on mineral resources.

6.2 GROWTH INDUCEMENT

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project or the construction of additional housing, either directly or indirectly, could foster economic or population growth in the surrounding environment. Typical growth inducing factors might include the extension of urban services or transportation infrastructure to a previously unserved or under-served area, or the removal of major barriers to development. This section evaluates the proposed Project's potential to create such growth inducements. Not all aspects of growth inducement are negative; rather, negative impacts associated with growth inducement occur only where the growth associated with the proposed Project would cause adverse environmental impacts.

[1] Public Resources Code Section 2762(a)(1).

The proposed Project would involve direct growth inducement through the construction of 325 new housing units. Assuming an average household size of 2.65 people consistent with the U.S. Census Bureau's 2005-2009 American Community Survey 5 year estimates, the construction of 325 residential units in the Specific Plan Area could bring as many as 3,808 new residents to the city. As described in Chapter 4.11, Population and Housing, development of the proposed Project would be consistent with regional planning efforts.

The proposed Project is not expected to result in indirect growth inducement because the additional housing units and population resulting from implementation of the proposed Project would not exceed regional projections. Additional employment growth would occur incrementally over a period of approximately 25 years and would be consistent with the regional planning objectives established for the Bay Area. The Specific Plan Area is a previously developed area in the highly urbanized Transit Station Area Priority Development Area (PDA) as identified under the *Plan Bay Area*, and would not involve the extension of infrastructure or services to a previously unserved area.

Development of the proposed Project would involve demolition and construction activities that could generate some temporary employment opportunities; however, given the temporary nature of such opportunities, it is unlikely that construction workers would relocate to Millbrae as a result of the proposed Project. Thus, the proposed Project would not be considered growth-inducing from an employment perspective.

6.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. This section lists the impacts for the proposed Specific Plan Update, TOD #1 Project, and TOD #2 Project that were found to be significant and unavoidable.

TABLE 6-1 SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROPOSED PROJECT

SPECIFIC PLAN UPDATE
AIR QUALITY
Impact AQ-SP-2.1: Future projects under the Specific Plan Update could result in fugitive dust (coarse inhalable particulate matter [PM_{10}] and fine inhalable particulate matter [$PM_{2.5}$]) from construction activities that could violate air quality standards or contribute substantially to an existing or projected air quality violation and expose sensitive receptors to elevated concentrations of pollutants during construction activities.
Impact AQ-SP-2.2: Operational phase emissions associated with the proposed Specific Plan Update would exceed BAAQMD's regional operational-phase significance thresholds for Volatile Organic Compounds (VOCs).
Impact AQ-SP-3: Implementation of the proposed Specific Plan Update would exceed the Bay Area Air Quality Management Districts (BAAQMD's) regional significance thresholds.
Impact AQ-SP-4.1: Construction activities associated with future development projects accommodated under the proposed Specific Plan Update could expose nearby receptors to substantial concentrations of Toxic Air Contaminants (TACs).
CULTURAL RESOURCES
Impact CULT-SP-1: Implementation of the Specific Plan Update could adversely affect current and future historical resources.

TABLE 6-1 SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROPOSED PROJECT

TRANSPORTATION AND CIRCULATION
Impact TRANS-SP-1.1: Implementation of the Specific Plan Update would result in the addition of traffic to intersection #4 El Camino Real/Millbrae Avenue causing this intersection to degrade from LOS D to LOS F in the AM peak hour and would add more than five (5) seconds of delay in the PM peak hour (currently operating at LOS E), resulting in LOS F under Existing Plus Project conditions.
Impact TRANS-SP-1.2: Implementation of the Specific Plan Update would result in the addition of traffic volumes to freeway segments currently operating over capacity and Specific Plan Update-generated traffic would add more than one (1) percent of the segment's capacity at the following locations: ▪ Northbound US 101 from Millbrae Avenue to Broadway – AM peak hour ▪ Northbound US 101 from Broadway to Peninsula Avenue – AM peak hour
Impact TRANS-SP-1.3: Implementation of the Specific Plan Update would contribute a considerable level of traffic and increase the average vehicle delay by more than five (5) seconds at the intersection #4 El Camino Real/Millbrae Avenue during the AM and PM peak hour.
Impact TRANS-SP-1.4: Implementation of the Specific Plan Update would contribute a considerable level of traffic to intersection #5 El Camino Real/Murchison Drive and cause this intersection to degrade from LOS D to LOS E in the PM peak hour under Cumulative (2040) Plus Project (Specific Plan Update) conditions.
Impact TRANS-SP-1.5: Implementation of the Specific Plan would contribute a considerable level of traffic to intersection #7 California Drive/Murchison Drive and cause this intersection to degrade from LOS D to LOS F in the AM and PM peak hour under Cumulative (2040) Plus Project (Specific Plan Update) conditions. In addition, the intersection meets the Caltrans peak hour signal warrant for urbanized areas (Warrant 3).
Impact TRANS-SP-1.6: Implementation of the Specific Plan Update would contribute a considerable level of traffic to intersection #8 Rollins Road/Millbrae Avenue and cause this intersection to degrade from LOS D to LOS F in the AM and PM peak hour under Cumulative (2040) Plus Project (Specific Plan Update) conditions.
Impact TRANS-SP-1.7: Under Cumulative (2040) Plus Project (Specific Plan Update) conditions, the Specific Plan Update would add traffic volumes representing more than one (1) percent of the segment's capacity to the following freeway segments exceeding the capacity without the Specific Plan Update: Northbound and Southbound US 101 Grand Avenue to Produce Avenue – AM and PM peak hours Northbound US 101 Produce Avenue to I-380 – AM peak hour Northbound US 101 I-380 to Millbrae Avenue – AM peak hour Northbound and Southbound US 101 Millbrae Avenue to Broadway – AM and PM peak hours Northbound and Southbound US 101 Broadway to Peninsula Avenue – AM and PM peak hours
Impact TRANS-SP-2: As discussed under TRANS-1, implementation of the Specific Plan Update would result in a *significant* impact at the CMP facilities during at least one (1) of the peak hours under Existing (2014) and Cumulative (2040) conditions as follows: Existing (2014) Plus Project (Specific Plan Update) ▪ El Camino Real/Millbrae Avenue – AM and PM peak hour ▪ Northbound US 101 from Millbrae Avenue to Broadway – AM peak hour ▪ Northbound US 101 from Broadway to Peninsula Avenue – AM peak hour Cumulative (2040) Plus Project (Specific Plan Update) ▪ El Camino Real/Millbrae Avenue – AM and PM peak hour ▪ Northbound and Southbound US 101 Grand Avenue to Produce Avenue – AM and PM peak hours ▪ Northbound US 101 Produce Avenue to I-380 – AM peak hour ▪ Northbound US 101 I-380 to Millbrae Avenue – AM peak hour ▪ Northbound and Southbound US 101 Millbrae Avenue to Broadway – AM and PM peak hours ▪ Northbound and Southbound US 101 Broadway to Peninsula Avenue – AM and PM peak hours

TABLE 6-1 SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROPOSED PROJECT

Impact TRANS-SP-4: Queues that were already exceeding available storage space under Existing (2014) conditions were exacerbated under Existing (2014) Plus Project (Specific Plan Update) conditions at and between the intersections of El Camino Real/Millbrae Avenue and Rollins Road/Millbrae Avenue resulting in hazardous driving conditions from backed up traffic.
UTILITIES AND SERVICE SYSTEMS
Water Supply
Impact UTIL-SP-1: With implementation of the proposed Specific Plan Update Plan there would not be sufficient water supplies available to serve the proposed Project from existing entitlements and resources during multiple dry years.
TOD #1 PROJECT
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*.
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).
Impact AQ-TOD#1-3.1: Construction of the proposed TOD #1 project would result in exceedance of BAAQMD's risk thresholds.
Impact AQ-TOD#1-3.2: Implementation of the proposed TOD #1 project would exceed BAAQMD's regional significance thresholds.
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.
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.
LAND USE AND PLANNING
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.
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.
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.
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.
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.

TABLE 6-1 SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROPOSED PROJECT

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).
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: Existing (2014) Plus Project (TOD #1) ▪ El Camino Real/Millbrae Avenue – AM and PM peak hour Near Term (2020) Plus Project (TOD #1) ▪ El Camino Real/Millbrae Avenue – AM and PM peak hour Cumulative (2040) Plus Project (TOD #1) ▪ El Camino Real/Millbrae Avenue – AM and PM peak hours
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.
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.
TOD #2 Project
AIR QUALITY
Impact AQ-TOD#2-1: The proposed TOD #2 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*.
Impact AQ-TOD#2-2: Operation of the proposed TOD #2 project would generate emissions that exceed BAAQMD's regional operational-phase significance thresholds for Volatile Organic Compounds (VOC) and nitrogen oxides (NO_X).
Impact AQ-TOD#2-3.1: Construction of the proposed TOD #2 project would result in exceedance of BAAQMD's risk thresholds.
Impact AQ-TOD#2-3.2: Implementation of the proposed TOD #2 project would exceed BAAQMD's regional significance thresholds.
Impact AQ-TOD#2-4.1: Risk impacts to nearby sensitive receptors from construction of the proposed TOD #2 project would exceed the cancer risk threshold of 10 in a million. Additionally, risk impacts from construction of both the proposed TOD #1 and TOD #2 projects concurrently would exceed the cancer risk and $PM_{2.5}$ thresholds.
Impact AQ-TOD#2-4.2: Due to the proximity of the proposed TOD #2 project site to high-volume roadways and potentially other stationary sources, on-site residents could potentially be exposed to substantial TAC concentration.
TRANSPORTATION AND CIRCULATION
Impact TRANS-TOD#2-15.1: The proposed TOD #2 project would add traffic to intersection #4 El Camino Real/Millbrae Avenue and would cause 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 (currently operating at LOS E), resulting in LOS F under Existing (2014) Plus Project (TOD #2) conditions. The worsening of traffic conditions at this location is due primarily to the increase in traffic from the project using El Camino Real as a regional and local access point.

TABLE 6-1 SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROPOSED PROJECT

Impact TRANS-TOD#2-15.2: The proposed TOD #2 project would result in the addition of traffic to intersection #4 El Camino Real/Millbrae Avenue causing this intersection to degrade from LOS D to LOS 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 #2) conditions. The worsening of traffic conditions at this location is due primarily to the increase in traffic from the project using El Camino Real as a regional and local access point.
Impact TRANS-TOD#2-15.4: The proposed TOD #2 project would result in the addition of traffic to intersection #8 Rollins Road/Millbrae Avenue and would cause this intersection to degrade from LOS D to LOS E in the AM and PM peak hours under Cumulative (2040) Plus Project (TOD #2) conditions.
Impact TRANS-TOD#2-15.4: The proposed TOD #2 project would result in the addition of traffic to intersection #8 Rollins Road/Millbrae Avenue and would cause this intersection to degrade from LOS D to LOS E in the AM and PM peak hours under Cumulative (2040) Plus Project (TOD #2) conditions.
Impact TRANS-TOD#2-16: As discussed under TRANS-15, implementation of the proposed TOD #2 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: Existing (2014) Plus Project (TOD #2) ▪ El Camino Real/Millbrae Avenue – AM and PM peak hour Near Term (2020) Plus Project (TOD #2) ▪ El Camino Real/Millbrae Avenue – AM and PM peak hour Cumulative (2040) Plus Project (TOD #2) ▪ El Camino Real/Millbrae Avenue – AM and PM peak hours
Impact TRANS-TOD#2-18: Queues that were already exceeding available storage space under Existing (2014) conditions were exacerbated under Existing (2014) Plus Project (TOD #2) 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.
UTILITIES AND SERVICE SYSTEMS
Water Supply
Impact UTIL-TOD#2-1: Implementation of the proposed TOD #2 project would not have sufficient water supplies available to serve the project from existing entitlements and resources during multiple dry years.

6.4 SIGNIFICANT IRREVERSIBLE CHANGES

Section 15126.2(c) of the CEQA Guidelines requires an EIR to discuss the extent to which the proposed Project would commit nonrenewable resources to uses that future generations would probably be unable to reverse. The three CEQA-required categories of irreversible changes are discussed below.

6.4.1 CHANGES IN LAND USE THAT COMMIT FUTURE GENERATIONS

The proposed Project would guide future development in the Specific Plan Area, and would also involve the redevelopment of previously developed sites. The Specific Plan Area currently contains office, retail, industrial/non-retail, and residential uses. The proposed TOD #1 and TOD #2 projects would redevelop their respective project sites with two mixed-use developments that would bring new office, retail, residential, and hotel uses to the Specific Plan Area. The remaining Specific Plan Area would also see increases in these uses. Because the Specific Plan Area is already developed and is located in an urban area that already contains these uses, the proposed Project is not expected to result in any land use changes that would commit future generations to uses that are not already prevalent in the vicinity of the Specific Plan Area.

6.4.2 IRREVERSIBLE DAMAGE FROM ENVIRONMENTAL ACCIDENTS

Potential environmental accidents of concern include those that would have adverse effects on the environment or public health due to the nature or quantity of material released during an accident and the receptors exposed to that release. Demolition and construction activities associated with implementation of the proposed Project would involve some risk for environmental accidents. However, these activities would be monitored by City, State, and federal agencies, and would follow professional industry standards for safety and construction. Additionally, the land uses proposed by the Project would not include any uses or activities that are likely to contribute to or be the cause of a significant environmental accident. As a result, the proposed Project would not pose a substantial risk of environmental accidents.

6.4.3 LARGE COMMITMENT OF NONRENEWABLE RESOURCES

Consumption of nonrenewable resources includes issues related to increased energy consumption, conversion of agricultural lands, and lost access to mining reserves. The proposed Project would require water, electric, and gas service, as well as additional resources for construction. Additionally, the ongoing operation of the proposed Project would involve the use of nonrenewable resources. Construction and ongoing maintenance of the proposed Project would irreversibly commit some materials and nonrenewable energy resources. Materials and resources used would include, but are not limited to, nonrenewable and limited resources such as oil, gasoline, sand, gravel, asphalt, and steel. These materials and energy resources would be used for infrastructure development, transportation of people and goods, and utilities. During the operational phase of the proposed Project (post-construction), energy sources including oil and gasoline would be used for lighting, heating, and cooling of residences, as well as transportation of people to and from the Specific Plan Area.

However, the proposed Project would include several features that would offset or reduce the need for nonrenewable resources. The proposed Project would be required to comply with all applicable building and design requirements, including those set forth in Title 24 relating to energy conservation. In compliance with CALGreen, the State's Green Building Standards Code, the proposed Project would be required to reduce water consumption by 20 percent, divert 50 percent of construction waste from landfills, and install low pollutant-emitting materials. The landscaping plan for the proposed Project would group plants with similar water, climatic,

and soil requirements to conserve water and create a drought responsive landscape. Additionally, the irrigation system is proposed to include the installation of a fully automated "SMART" irrigation controller with rain-sensor, low-precipitation/low-angle irrigation spray heads, low-volume drip tubing installed below mulch, low-water consuming plants, soil moisture retention techniques, and mulching to reduce evapotranspiration from the root zone. The proposed Project would also apply environmentally sustainable standards for demolition, construction, and operation.

Although the construction and ongoing operation of the proposed Project would involve the use of nonrenewable resources, through the inclusion of energy-conserving Project features and compliance with applicable standards and regulations, the proposed Project would not represent a large commitment of nonrenewable resources.

The Specific Plan Area does not contain any agricultural land or a mining reserve, so it would not affect those natural resources.