

**DRAFT**  
**400 East Millbrae Avenue Outdoor Advertising Display Project**  
**Initial Study/Mitigated Negative Declaration**  
**City of Millbrae, San Mateo County, California**

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Report Date: June 24, 2022

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## ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius (Centigrade)
°F	degrees Fahrenheit
µg/L	micrograms per liter
µg/m <sup>3</sup>	micrograms per cubic meter
AB	Assembly Bill
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor's Parcel Number
AQP	Air Quality Plan
ARB	California Air Resources Board
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BERD	California Built Environment Resource List
BMP	Best Management Practice
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CBC	California Building Standards Code
CCFD	Central County Fire Department
CDF	California Department of Finance
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CGS	California Geologic Survey
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CNPSEI	California Native Plant Society's Electronic Inventory
CO	carbon monoxide
CO <sub>2</sub> e	carbon dioxide equivalent
CPHI	California Points of Historical Interest
CRHR	California Register of Historical Resources
CUP	Conditional Use Permit
dB	decibel

**Acronyms and Abbreviations**

dba	A-weighted decibel
DOC	California Department of Conservation
DPM	diesel particulate matter
DPR	California Department of Parks and Recreation
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
ESL	Environmental Screening Level
EV	electric vehicle
FAA	Federal Aviation Administration
FCS	FirstCarbon Solutions
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	greenhouse gas
HMP	Hazard Mitigation Plan
in/sec	inch per second
IPaC	Information for Planning and Consultation
IS/MND	Initial Study/Mitigated Negative Declaration
kWh	kilowatt-hours
L <sub>dn</sub>	day/night sound level
LED	light-emitting diode
L <sub>eq</sub>	equivalent continuous sound level
L <sub>max</sub>	maximum noise/sound level
LMHP	Multi-Jurisdictional Local Hazard Mitigation Plan
LRA	Local Responsibility Area
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MCL	Maximum Contaminant Level
mg/Kg	milligrams per kilograms
MLD	Most Likely Descendant
mph	miles per hour
MSASP	Millbrae Station Area Specific Plan
MT	metric tons
MWh	megawatt-hours
NAAQS	National Ambient Air Quality Standards
NAHC	California Native American Heritage Commission

NO <sub>x</sub>	nitrogen oxides
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OAAA	Outdoor Advertising Association of America
OADS	Outdoor Advertising Display Sign
PF	Public Facility
PG&E	Pacific Gas and Electric Company
PHEV	Plug-in Hybrid-Electric Vehicles
PM <sub>10</sub>	particulate matter, including dust, 10 micrometers or less in diameter
PM <sub>2.5</sub>	particulate matter, including dust, 2.5 micrometers or less in diameter
PPV	peak particle velocity
ROG	reactive organic gases
RPS	Renewables Portfolio Standard
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SFEI	San Francisco Estuary Institute
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SLF	Sacred Lands File
SMC Energy Watch	San Mateo County Energy Watch
SRA	State Responsibility Area
TAC	toxic air contaminants
TCR	Tribal Cultural Resource
TNC	Transportation Network Company
TPH	total petroleum hydrocarbons
TPH-d	total petroleum hydrocarbons – diesel
TPH-g	total petroleum hydrocarbons – gasoline
TPH-mo	total petroleum hydrocarbons – motor oil
US-101	U.S. Highway 101
USDA	United States Department of Agriculture
USDOT	United States Department of Transportation
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
VMT	Vehicle Miles Traveled
VOC	volatile organic compound
WPCP	Water Pollution Control Plant
VOC	volatile organic compounds

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## SECTION 1: INTRODUCTION

### 1.1 - Purpose

The purpose of this Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) is to identify any potential environmental impacts that would result from implementation of the proposed 400 East Millbrae Avenue Outdoor Advertising Display Sign (OADS) Project (proposed project) in the City of Millbrae, California (City). Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Millbrae has discretionary approval authority over the proposed project and is the Lead Agency in the preparation of this Draft IS/MND and any additional environmental documentation required for the proposed project. The intended use of this document is to determine the level of environmental impacts resulting from the proposed project and the level of analysis required to adequately analyze the proposed project pursuant to the requirements of CEQA. Where a potentially significant impact is found, this Draft IS/MND identifies mitigation measures that would reduce such impacts to a less than significant level. This Draft IS/MND also provides the basis for input from public agencies, organizations, and interested members of the public.

The remainder of this section provides a brief description of the project location and the primary project characteristics. Section 2 includes an environmental checklist that provides an overview of the potential impacts that may result from project implementation. Each individual subsection elaborates on the information contained in the environmental checklist, and provides justification for each checklist response, and Section 3 contains the List of Preparers.

### 1.2 - Project Summary

Outfront Media, Inc. (project applicant) proposes to construct a double-sided OADS, also commonly referred to as a "digital billboard" at 400 East Millbrae Avenue. The OADS consists, collectively, of the two back-to-back light-emitting diode (LED) digital displays and the sign structure. These displays would be north- and south-facing that would be visible to vehicles traveling in both directions on U.S. Highway 101 (US-101) (northbound and southbound). Both billboard panels would be LED digital display panels used for general commercial advertising.

### 1.3 - Project Location

The proposed project includes the installation of a new OADS in the City of Millbrae, in San Mateo County, California (Exhibit 1 and Exhibit 2). The City is bounded by the City of San Bruno to the north, the City of Burlingame to the south, Interstate 280 (I-280) to the west, and San Francisco International Airport (SFO) and San Francisco Bay to the east. The OADS would be installed on a 2.39-acre parcel located at 400 East Millbrae Avenue (Assessor's Parcel Number [APN] 024-371-010) (Exhibit 3). The project site is triangular in shape and is bounded by US-101 to the west, Millbrae Avenue to the south, US-101 northbound on-ramp and South McDonnell Road to the north, and a surface level parking lot to the east. The project site parcel is currently owned by the City and is developed with the City's Water Pollution Control Plant (WPCP). SFO is located approximately 0.1-mile north of the project site. Additionally, the San Francisco Bay is located approximately 0.2-mile

east of the site. The Millbrae Bay Area Rapid Transit (BART) and Caltrain Station (Millbrae BART/Caltrain Station) is located approximately 0.3-mile west of the project site.

The City of Millbrae General Plan (General Plan) identifies the project site and vicinity to be within the Millbrae Station Area Specific Plan (MSASP). The City will maintain underlying ownership of the site, and the City and OutFront may enter into a Lease and Relocation Agreement for the OADS. The lease will permit this sign to occupy a portion of the City of Millbrae WPCP site.

### 1.3.1 - Land Use Designation and Zoning

The General Plan identifies the project site as part of the MSASP, as shown in Exhibit 4. The MSASP and the City's Official Zoning Map apply a Public Facility (PF) zoning designation to the site. According to the MSASP, the PF zoning designation is applied to portions of the plan area for the MSASP that are reserved for utility-related uses or public services, including City storage yards, parking, and potentially stormwater treatment facilities or bioretention swales.<sup>1</sup> The WPCP, in which the project site is located, would continue its use as a public facility.

The General Plan Land Use Map<sup>2</sup> designates the areas surrounding the project site as Industrial and Utility, General Commercial, and Park and Open Space. The City of Millbrae's Official Zoning Map<sup>3</sup> zones the areas surrounding the project site as Planned Development, Industrial, and Open Space. Because the site is located within 0.10 mile of SFO, the proposed project obtained clearance from the Federal Aviation Administration (FAA), determining that the sign would not pose a hazard to air navigation.<sup>4</sup>

## 1.4 - Detailed Project Description

As briefly discussed in Section 1.2, Project Summary, the proposed project includes the installation of one new OADS with two LED-display panels.

### 1.4.1 - Proposed Outdoor Advertising Display Sign

The new OADS would be located along the western boundary of the project site, directly east of US-101. The proposed display sign structure would be 45 feet in height overall and its frame would be 14 feet by 48 feet (height by width). The billboard structure would be equipped with upper and lower rear catwalks measuring approximately 2.5 feet wide and would extend along the length of the back of the digital LED panels. Access to the catwalks would be provided by an access ladder attached to the display sign's structure.

The foundation used for the proposed structure would be constructed using a vibrated piling installation method. The piling, or column, is vibrated by the vibrator machine to a speed that reduces the friction in the soil grain structure, so the soil reaches a "pseudo liquid" condition, allowing the pile element to penetrate the soil. The column foundation would be approximately 5 feet in diameter and would extend to a depth of approximately 77 feet below the ground surface.

<sup>1</sup> City of Millbrae. 2021. Millbrae Station Area Specific Plan. October 26.

<sup>2</sup> City of Millbrae. 1998. City of Millbrae General Plan – Map 3-4 Land Use Plan. November 24.

<sup>3</sup> City of Millbrae. 2009. City of Millbrae Official Zoning Map. October 13.

<sup>4</sup> Federal Aviation Administration (FAA). 2020. Aeronautical Study No. 2020-AWP-3111-OE. October 7.

The two digital LED panels would have an advertising surface area of 672 square feet, or 1,344 square feet total for both of the panels. Exhibit 5a depicts the preliminary site plan and Exhibit 5b provides the elevation.

The proposed billboard display would cycle through a rotation of images and would be used primarily for commercial advertisements. The billboard would operate 24 hours per day, seven days per week. Other uses for the billboard could include promoting community events, highlighting public awareness campaigns, and broadcasting emergency messages when necessary. The proposed billboard would not show video or motion, nor would it emit noise or audio. The LED panels are proposed to rotate images once every 8 seconds. Additionally, the maximum ambient light output level of the LED panels would be 0.3 foot-candles at 250 feet. The billboard would never operate at more the one-sixth of the maximum brightness level for electronic displays as set forth by California State law.

## 1.5 - Billboard-Specific Regulatory Context

### 1.5.1 - Relevant Siting/Provision Regulations and Standards

The City's Municipal Code includes Chapter 10.10, Sign Regulations. Section 10.10.010 of the Municipal Code states that the intent of the Sign Regulations is to restore, maintain, protect, and enhance both public safety and the City's visual environment while recognizing the right of businesses to identify and/or advertise their business with commercial signs.<sup>5</sup> This chapter is also known as "Millbrae Sign Regulations" and its provisions apply to the proposed project.

According to Section 10.10.040, a sign permit issued by the Community Development Department is required for each business entity and each business sign for a single structure. In addition, this provision also notes that an electrical permit must be obtained for electric signs. Section 10.10.060 requires a Use Permit for freestanding signs larger than 8 square feet in area or 4 feet in height. Therefore, the proposed project would require a Use Permit.

Section 10.10.150, Design Review, states that a Sign Permit shall only be issued when the proposed sign is consistent with all sections of Millbrae Sign Regulations. The design review will determine whether a sign is compatible with the location, number, size, design, lighting, materials, and colors within its surroundings. Additionally, any permanent sign with total sign area exceeding 50 square feet must be reviewed and action taken on the Sign Permit application by the Planning Commission.

Section 10.10.350, Exempt signs, (B) states that this class of signs set forth in this section are exempt from the standards specified in the Chapter 10.10 Sign Regulation and states that any commercial freestanding signs larger than eight square feet in area or four feet height to be placed on property owned by the public authority shall be granted a sign permit and a use permit; provided that the planning commission determines through a design review that: (1) such signs satisfy Millbrae Municipal Code 10.05.2520(D); and (2) the location, number, size, scale, design, lighting, materials

<sup>5</sup> City of Millbrae. 2021. Millbrae Municipal Code – Chapter 10.10 Sign Regulations. Website: <https://www.codepublishing.com/CA/Millbrae/#!/Millbrae10/Millbrae1010.html#10.10.410>. Accessed February 8, 2022.

and colors of such signs harmonize with and are compatible with the immediate surroundings of such signs.

Because the proposed project would include the construction of one new OADS with two digital LED panels within City-owned property that would be 10 feet from the nearest curb grade, the proposed project would be consistent with the regulation of one sign per parcel and the conditions regarding distance from the nearest curb grade and placement on City-owned property. With respect to maximum size, the proposed billboard would have an advertising surface area of two digital LED panels that would total 1,344 square feet and the billboard structure would be 45 feet in height. Although the proposed project would be greater than the maximum size regulations pursuant to Section 10.10.250, the project applicant is requesting a Conditional Use Permit (CUP) to allow for the height and surface area increase. The proposed OADS sign is considered exempt from the sign standards specified in Chapter 10.10 Sign Regulations in that the sign is located on property that is City-owned and controlled by a public authority (Article IX. Exempt Signs, 10.10.350 Exempt signs. B.). Any commercial freestanding signs larger than 8 square feet in area or 4 feet high to be placed on property owned by the public authority shall be granted a sign permit and a use permit; provided that the planning commission determines through a design review that: (1) such signs satisfy Millbrae Municipal Code 10.05.2520(D); and (2) the location, number, size, scale, design, lighting, materials and colors of such signs harmonize with and are compatible with the immediate surroundings of such signs.

### 1.5.2 - Relevant Lighting Regulations and Standards

The California Department of Transportation (Caltrans) Outdoor Advertising Act and Regulations 2011 Edition (Outdoor Advertising Act) addresses illumination generated by advertising displays by stating that displays may not “interfere with the effectiveness of, or obscure any official traffic sign, device, or signal . . . nor shall any advertising display cause beams or rays of light to be directed at the traveled ways if the light is of an intensity or brilliance as to cause glare or to impair the vision of any driver, or to interfere with any driver’s operation of a motor vehicle.” Caltrans regulations prohibit images on signs from changing more than once every four seconds.<sup>6</sup>

With respect to the brightness of signs, Business and Professions Code Section 5403(g) defines the brightness standard for changeable electronic variable message billboards in relation to Vehicle Code Section 21466.5, which provides:

No person shall place or maintain or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway. A light source shall be considered vision impairing when its brilliance exceeds the values listed below.

The brightness reading of an objectionable light source shall be measured with a 1½-degree photoelectric brightness meter placed at the driver’s point of view. The maximum measured brightness of the light source within 10 degrees from the

<sup>6</sup> California Department of Transportation (Caltrans). 2011. Outdoor Advertising Act and Regulations 2011 Edition. California Business Professional Code Sections 5200–5486.

driver's normal line of sight shall not be more than 1,000 times the minimum measured brightness in the driver's field of view, except that when the minimum measured brightness in the field of view is 10 foot-lamberts or less, the measured brightness of the light source in foot-lambert shall not exceed 500 plus 100 times the angle, in degrees, between the driver's line of sight and the light source.

The Outdoor Advertising Association of America (OAAA), however, recommends more conservative lighting intensity standards for OADS of the proposed size. The proposed project would commit to a maximum ambient light output level of 0.3 foot-candle at a distance of 250 feet from the billboards, as recommended by the OAAA. The light levels emitted from the LED panels would be set to adjust based upon ambient light conditions at any given time (i.e., nighttime versus daytime).

## 1.6 - Construction

The proposed project would require approximately 5 days to complete OADS construction. Construction and grading would begin approximately in December of 2022. Construction access to the site would be via the existing WPCP driveway off Millbrae Avenue.

## 1.7 - Required Discretionary Approvals

The City has discretionary approval authority over the proposed project and is the CEQA Lead Agency for the preparation of this Draft IS/MND. To implement the proposed project, the City and other applicable agencies listed below would need to review and approve the following permit applications submitted by the applicant and secure the required approvals for the proposed project:

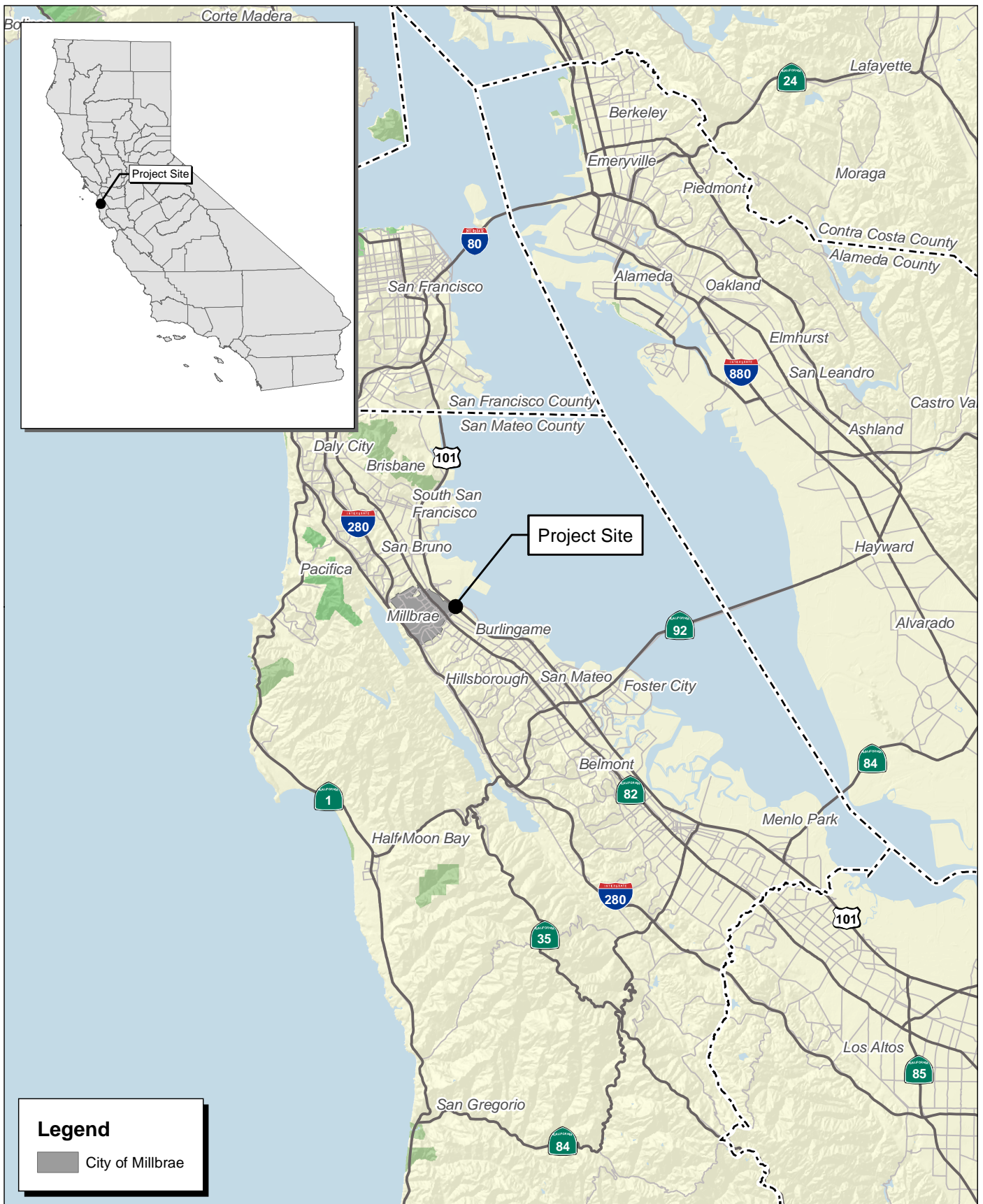
- Design Review
- Conditional Use Permit
- Sign Permit
- Caltrans Outdoor Advertising Permit
- FAA Determination of No Hazard
- Ministerial approvals from the City, including grading, building, and encroachment permits
- Lease and Relocation Agreement for Outdoor Advertising Display Sign
- Adoption of this Draft IS/MND

Subsequent activities would be examined in light of the adopted IS/MND to determine whether additional CEQA documentation would be required pursuant to Section 15162 of the CEQA Guidelines for subsequent approvals by the City and Caltrans, including the permits/approvals listed above.

## 1.8 - Intended Uses of this Document

This Draft IS/MND has been prepared to determine the appropriate scope and level of detail required in completing the environmental analysis for the proposed project. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the proposed project. The Draft IS/MND will be circulated for a minimum of 30 days, during which comments concerning the analysis contained in the Draft IS/MND should be sent to:

Sam Fielding, Senior Planner  
Planning Division  
621 Magnolia Avenue  
Millbrae, CA 94030  
Phone: 650.259.2341  
Email: sfielding@ci.millbrae.ca.us



Source: Census 2000 Data, The California Spatial Information Library (CaSIL). San Mateo County.

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## Exhibit 1 Regional Location Map

CITY OF MILLBRAE  
400 EAST MILLBRAE AVENUE OUTDOOR ADVERTISING DISPLAY SIGN PROJECT  
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

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Source: Bing Aerial Imagery. San Mateo County GIS Data. California State Geoportal. Metropolitan Transportation Commission (MTC).

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## Exhibit 2 Local Vicinity Map

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CITY OF MILLBRAE  
400 EAST MILLBRAE AVENUE OUTDOOR ADVERTISING DISPLAY SIGN PROJECT  
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

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Source: Bing Aerial Imagery. San Mateo County GIS Data.

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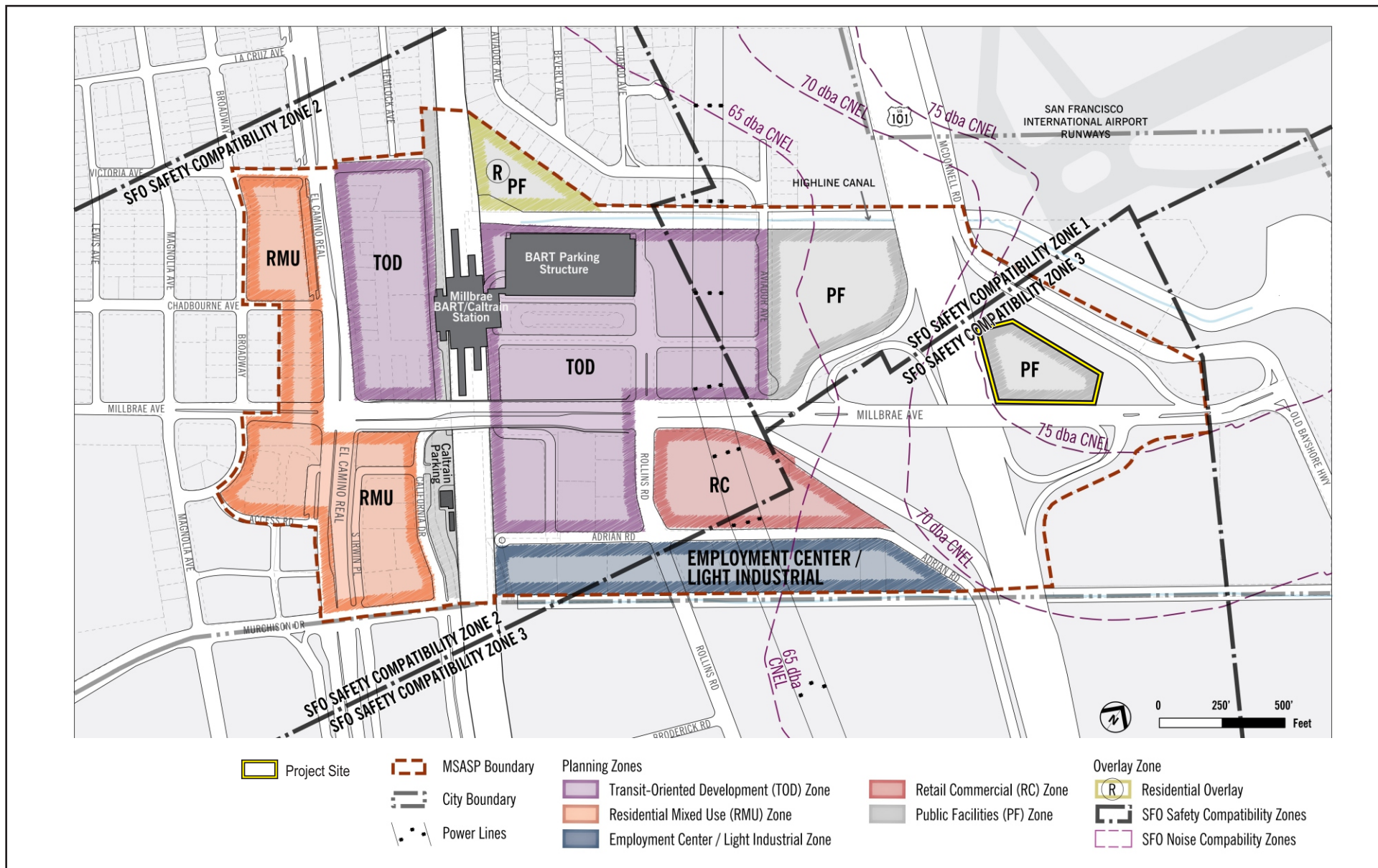
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## Exhibit 3 Project Location

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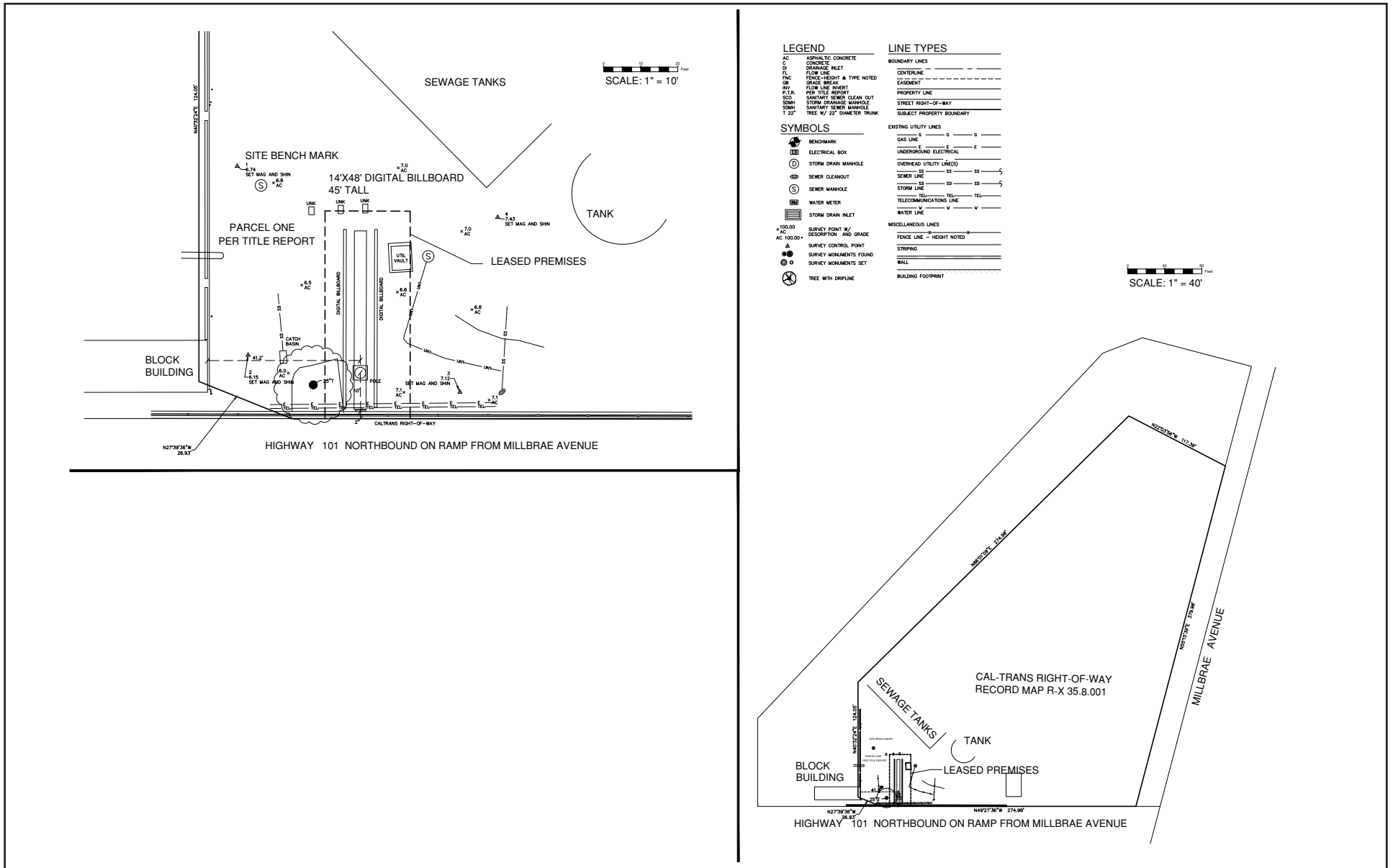
CITY OF MILLBRAE  
400 EAST MILLBRAE AVENUE OUTDOOR ADVERTISING DISPLAY SIGN PROJECT  
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

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Source: Millbrae Station Area Specific Plan

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Source: Chappell Surveying Inc., 12/3/2021.

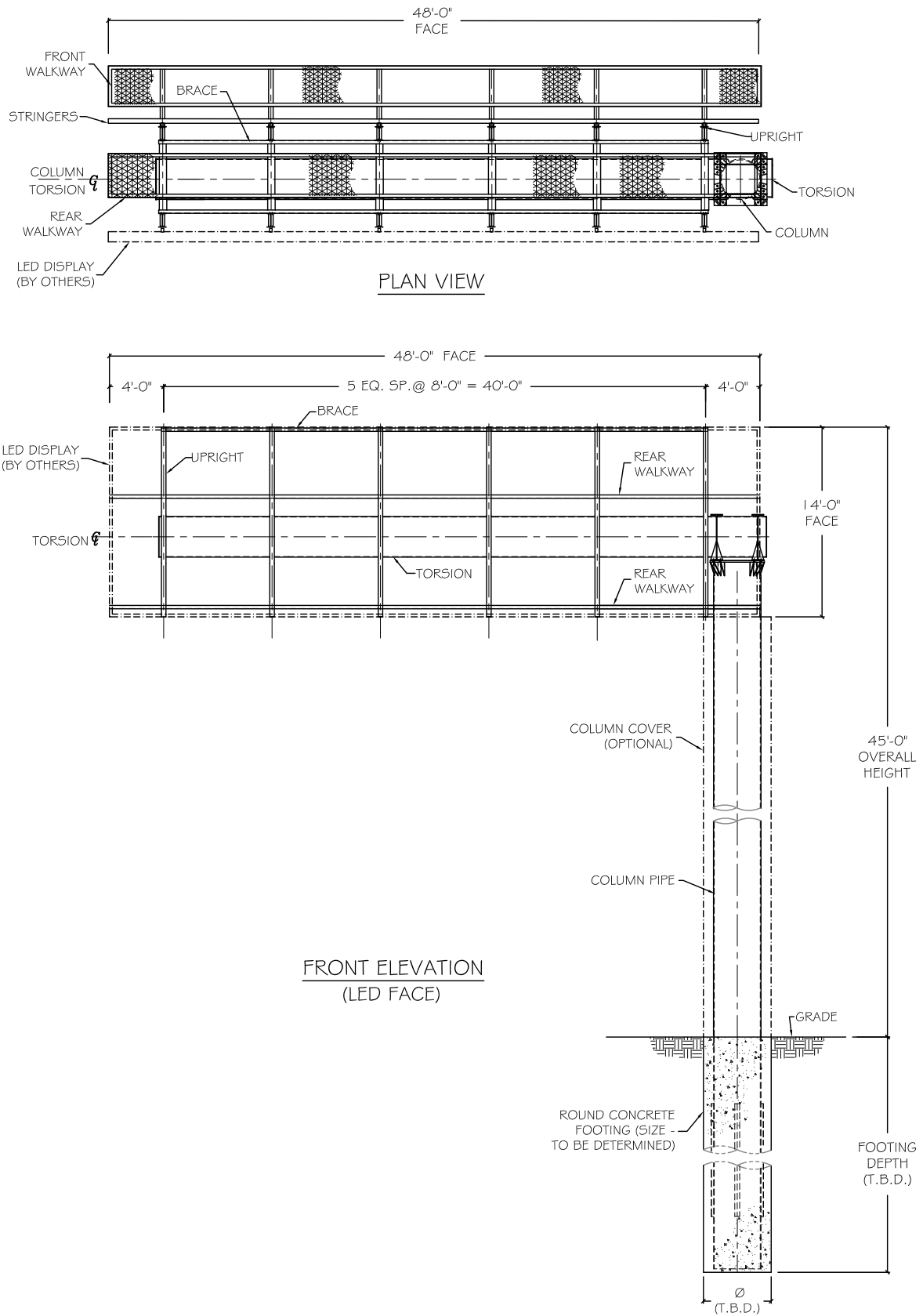
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**Exhibit 5a**  
**Preliminary Site Plan**

CITY OF MILLBRAE  
400 EAST MILLBRAE AVENUE OUTDOOR ADVERTISING DISPLAY SIGN PROJECT  
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

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Source: RMG Outdoor Inc., 05/06/2021.

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## Exhibit 5b Elevation and Plan View

CITY OF MILLBRAE  
400 EAST MILLBRAE AVENUE OUTDOOR ADVERTISING DISPLAY SIGN PROJECT  
INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

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## SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

Environmental Factors Potentially Affected		
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.		
<input checked="" type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture and Forestry Resources	<input checked="" type="checkbox"/> Air Quality
<input checked="" type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Energy
<input checked="" type="checkbox"/> Geology/Soils	<input type="checkbox"/> Greenhouse Gas Emissions	<input checked="" type="checkbox"/> Hazards/Hazardous Materials
<input type="checkbox"/> Hydrology/Water Quality	<input type="checkbox"/> Land Use/Planning	<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Noise	<input type="checkbox"/> Population/Housing	<input type="checkbox"/> Public Services
<input type="checkbox"/> Recreation	<input type="checkbox"/> Transportation	<input type="checkbox"/> Tribal Cultural Resources
<input type="checkbox"/> Utilities/Services Systems	<input type="checkbox"/> Wildfire	<input checked="" type="checkbox"/> Mandatory Findings of Significance
Environmental Determination		

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measure based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date: 6/20/22

Signed: 

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Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.1 Aesthetics</b> <i>Except as provided in Public Resources Code Section 21099, would the project:</i>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

### Setting

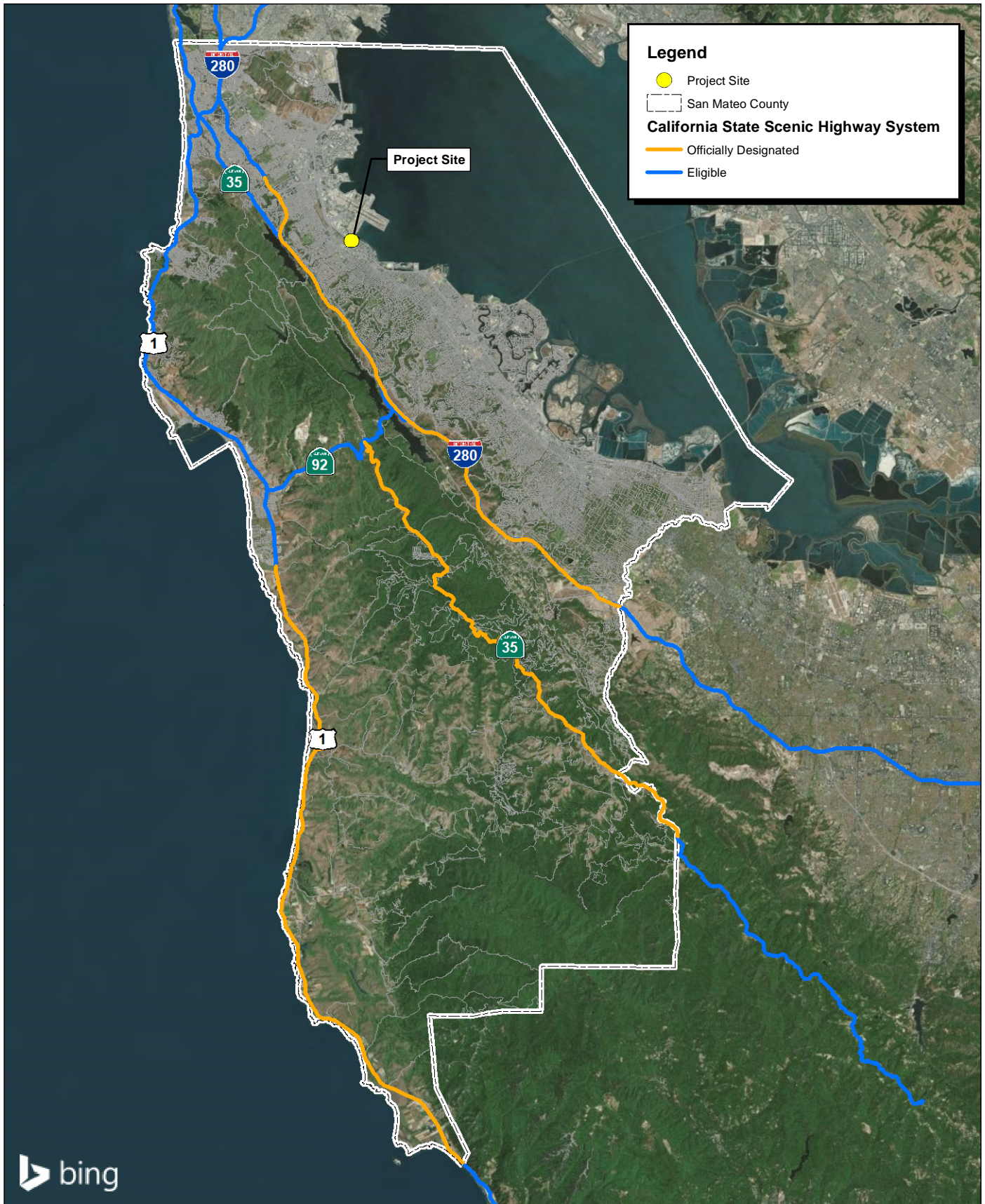
The City of Millbrae (City) is located on the northern San Francisco Peninsula approximately 15 miles south of the City of San Francisco. The City encompasses a total of 3.25 square miles and is characterized as a suburban residential community.

The General Plan has not established official scenic vistas or scenic highways in the City. Potential scenic features in the project vicinity include the San Francisco Bay to east, Santa Cruz Mountains to the west, and the San Bruno Mountains to the north. According to the San Mateo County General Plan, the nearest designated State and County scenic highways are State Route 35 (SR-35), from SR-92 to Santa Clara County; and I-280, from the City of Millbrae to Santa Clara County.<sup>7</sup> The segment of I-280 that is a dedicated California Scenic Highway is located approximately 2 miles west of the site. The segment of SR-35 that is a dedicated California Scenic Highway is located approximately 2.7 miles northwest of the site (Exhibit 6).

The analysis in this section is based, in part, on the Caltrans Outdoor Advertising Act and the Business and Professions Code 5403(g) for construction of electronic, LED billboards.

<sup>7</sup> San Mateo County. 2013. County of San Mateo General Plan Policies – Ch.4 – Visual Quality. Website: <https://planning.smcgov.org/sites/planning.smcgov.org/files/documents/files/GP%20Ch%204-Visual%20Policies.pdf>. Accessed February 15, 2022.

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Source: Bing Aerial Imagery. San Mateo County GIS Data. Caltrans California State Scenic Highways.

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## Exhibit 6 San Mateo County General Plan State Scenic Highways

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Would the project:

**a) Have a substantial adverse effect on a scenic vista?**

**Less than significant impact.** As previously noted, the General Plan has not established official scenic vistas in the City.

As shown in Exhibit 7a and 7b, no visual or scenic resources are visible at the project site. Additionally, the proposed OADS would not obstruct views of the San Francisco Bay due to distance, location of the proposed OADS, and intervening development. The proposed OADS would not obstruct views of the nearest mountain ranges as the OADS is located east of US-101 and the San Bruno Mountains are more than 4 miles north and the Santa Cruz Mountains are more than approximately 2.9 miles west of the project site. Views of these scenic features are limited by existing, intervening development in the surrounding vicinity of the proposed project and public views of scenic resources or scenic vistas would not be obstructed. Therefore, the impact on scenic vistas would be less than significant.

In addition, the proposed project would not have a substantial adverse effect on scenic vistas, scenic resources, or the existing visual quality or character in the project vicinity. Therefore, the impact on scenic vistas would be less than significant.

**b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?**

**Less than significant impact.** There are neither rock outcroppings nor historic buildings located on the project site. None of the roadways located near or surrounding the project site are designated as a scenic highway or route. As previously mentioned, the nearest designated State and County scenic highways are SR-35, from SR-92 to Santa Clara County and I-280, from the City of Millbrae to Santa Clara County.<sup>8</sup> The segment of the I-280 that is a dedicated California Scenic Highway is located approximately 2 miles west of the site. The segment of SR-35 that is a dedicated California Scenic Highway is located approximately 2.7 miles northwest of the site.

Because the proposed OADS is not located near a State Scenic Highway, it would not damage scenic resources, such as trees or rock outcroppings along a scenic highway. Thus, impacts would be less than significant.

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<sup>8</sup> San Mateo County. 2013. County of San Mateo General Plan Policies – Ch.4 – Visual Quality. Website: <https://planning.smcgov.org/sites/planning.smcgov.org/files/documents/files/GP%20Ch%2004-Visual%20Policies.pdf>. Accessed February 15, 2022.

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Existing View



Proposed Simulated View

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Existing View



Proposed Simulated View

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- c) **In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

**Less than significant impact.** The proposed project is in an urbanized area, and, therefore, this analysis evaluates the proposed project's consistency with all applicable zoning and regulations governing scenic quality. Although the proposed OADS's size specifications are not consistent with the maximum size limitations outlined in Municipal Code Chapter 10.10.250, Freestanding Signs, the project applicant is requesting a CUP to allow for the height and surface area increase. The proposed OADS would have a height of 45 feet and the two digital LED panels would have an advertising surface area of 672 square feet, or 1,344 square feet total for both of the panels. Municipal Code Chapter 10.10.250, Freestanding Signs, requires a CUP for permanent signs greater than 20 feet in height and that exceed a total sign area of 50 square feet. The project applicant is requesting a CUP to allow for the height and surface area increase, which will be reviewed by the Planning Commission. Furthermore, the proposed project would require a design review per the City's Sign Regulations (Municipal Code Chapter 10.10.150) to ensure conformity with regulations related to freestanding signs. Additionally, the proposed project would also be required to obtain both a sign permit and an electrical permit pursuant to Chapters 10.10.040 and 10.10.060, which would ensure the OADS would comply with applicable local regulations.

Because the proposed project is located approximately 0.1-mile south of SFO, the FAA conducted an aeronautical study under the provisions of 49 United States Code Section 44718 and Title 14 of the Code of Federal Regulations, Part 77. Initial findings from the aeronautical study indicated that a sign taller than 47 feet in height could have an adverse physical or electromagnetic interference effect and could be a hazard to air navigation. Because the height of the OADS is proposed to be 45 feet, the FAA has issued an immediate Determination of No Hazard to Air Navigation.<sup>9</sup>

The project site is designated as PF under the MSASP and is therefore, not located in a district where new signs are prohibited, namely in residential zones. Therefore, the proposed project would be consistent with the MSASP.

The proposed OADS would also be consistent with the standards in the Caltrans Outdoor Advertising Act related to illumination intensity. The applicant commits to a maximum ambient light output level of 0.3 foot-candle at 250 feet from the OADS, which is a more conservative lighting intensity standard for billboards of this proposed size when compared to State standards.

The proposed project would be consistent with applicable zoning and other local regulations as well as State regulations governing scenic quality. Therefore, impacts would be less than significant.

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<sup>9</sup> Federal Aviation Administration (FAA). 2020. Aeronautical Study No. 2020-AWP-3111-OE. October 7.

**d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

**Less than significant with mitigation incorporated.** Nighttime lights in the project vicinity includes streetlights, security lights within the WPCP, lights from cars, and other illuminating signs. The OADS is proposed in an urban area of the City, adjacent to US-101, where night lighting is ubiquitous.

The nearest sensitive receptors to the project site are single-family residences located approximately 900 feet west of the project site, the Aloft San Francisco Airport Hotel approximately 370 feet southeast of the project site, and the Westin San Francisco Airport Hotel located approximately 660 feet southeast of the project site. At 900 feet and located across US-101, the nearest residences would not be adversely affected by the proposed OADS because of its location and the intervening freeway. Given the OADS's proposed position and location between US-101 and the WPCP, the two hotels located southeast of the project site would also not be adversely affected by the proposed sign.

***Analysis of Sign Brightness***

The proposed project would comply with Municipal Code Chapter 10.10.100.K, Glare from Signs, which states that all illuminated signs shall be designed in such a manner to avoid undue glare or reflection of light that may diminish public safety, the quality of the City's visual appearance, or the quality of life of adjacent property owners or tenants.<sup>10</sup>

Furthermore, Business and Professions Code Section 5403(g) defines the brightness standard for changeable electronic variable message billboards in relation to Vehicle Code Section 21466.5, which provides:

No person shall place or maintain or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway. A light source shall be considered vision impairing when its brilliance exceeds the values listed below.

The brightness reading of an objectionable light source shall be measured with a 1½-degree photoelectric brightness meter placed at the driver's point of view. The maximum measured brightness of the light source within 10 degrees from the driver's normal line of sight shall not be more than 1,000 times the minimum measured brightness in the driver's field of view, except that when the minimum measured brightness in the field of view is 10 foot-lamberts or less, the measured brightness of the light source in foot-lambert shall not exceed 500 plus 100 times the angle, in degrees, between the driver's line of sight and the light source.

<sup>10</sup> City of Millbrae. 2021. Millbrae Municipal Code – Chapter 10.10.100 General Conditions. Website: <https://www.codepublishing.com/CA/Millbrae/#!/Millbrae10/Millbrae1010.html#10.10.100>. Accessed February 15, 2022.

Under the foregoing, the most conservative brightness limit with which the proposed OADS would have to comply is 500 foot-lamberts,<sup>11</sup> which is equivalent to 1,713 candela per square meter, also known as "nits."

The applicant proposes to operate the signage nighttime lighting limit in accordance with the recommendations of the OAAA, which indicates that the maximum ambient light output should be 0.3 foot-candle at a distance of 250 feet from billboard sign faces.<sup>12</sup> For a frame of reference, 0.3 foot-candle is comparable in brightness to the light emanating from a computer monitor, and the light levels emitted from the proposed OADS would be set to adjust based upon ambient light conditions at any given time (i.e., nighttime versus daytime). To ensure the lighting of the OADS does not exceed 0.3 foot-candle at 250 feet, the proposed project would ensure that the nighttime brightness of white board faces never exceeds the maximum nighttime luminance value for the display of 300 candela per square meter ( $\text{cd}/\text{m}^2$ ). This would also be similar to dimming the sign levels to less than 3 percent of maximum power. The proposed OADS would have built-in programmable controllers, allowing both time of day and intensity programming. These operational parameters (i.e., 0.3 foot-candle at 250 feet) translate into a brightness of approximately 300 nits, meaning that the signs would always operate at one-sixth of the maximum brightness level for LED billboards, as set forth by California State law.

To ensure that the proposed OADS would not have a significant impact on nearby sensitive uses, Mitigation Measure (MM) AES-1 would require an operational mechanism that turns off the display or turns the displays all black in the event of a malfunction. MM AES-1 requires that the OADS's operational parameters be provided to the City for review and approval prior to initial operation. In addition, this Draft IS/MND conservatively has determined that unwanted light trespass from the proposed project could result in significant impacts, and that implementation of MM AES-1 and MM AES-2 are required to ensure that impacts related to sign brightness are reduced to less than significant levels.

### ***Analysis of Driver Distraction***

Driver distraction could occur due to the changing of electronic messages on the proposed OADS.

As noted in the Project Description, the proposed OADS would operate under specific criteria to limit the potential for driver distraction. These criteria include the following: (1) images from the OADS would rotate no more than once every 8 seconds, and (2) light levels emitted from the OADS would adjust to respond to darker and lighter conditions to provide contrast.

California State law allows LED billboards to operate at a minimum dwell time of no less than 4 seconds before the display may transition to the next image. This requirement is set forth in Business and Professions Code Section 5405(d)(1), which provides, in pertinent part, "no message center display may include any illumination or message change that is in motion or appears to be in motion

<sup>11</sup> This calculation assumes a minimum measured brightness in the field of view of less than 10 foot-lamberts, and a view angle of zero degrees (i.e., directly in front of the driver).

<sup>12</sup> Setting a standard in foot candles is a more appropriate metric by which to judge impacts on sensitive receptors, as a foot candela measures light intensity experienced at the receptor, whereas measurement in candela/square meters or nits reveals only the intensity of light at its source.

or that changes in intensity or exposes its message for less than four seconds.” The OAAA likewise recommends that billboards display a message for no less than 4 seconds.<sup>13</sup> The Federal Highway Administration (FHWA), meanwhile, has approved of a similar dwell time standard. According to a FHWA memorandum, the acceptable range for the “[d]uration of each display is generally between 4 and 10 seconds—8 seconds is recommended.”<sup>14</sup>

Per industry standard, the proposed project’s compliance with an 8-second dwell time standard, which contemplates a change in messaging that is twice as slow as the State’s minimum 4-second standard, would avoid any significant potential to distract drivers; driver distraction studies have confirmed this determination.

Based on this information, there is no evidence that the operation of the proposed OADS would cause changes in crashes, eye glances, or driver behavior. Upon implementation of the proposed project, the brightness levels at nighttime is one factor that could be considered a potentially significant impact regarding driver distraction. However, as discussed above under the analysis of sign brightness, it is not anticipated to distract drivers on US-101. As a result, implementation of MM AES-1 and MM AES-2 would ensure that impacts related to driver distraction is reduced to a less than significant level.

## Mitigation Measures

- MM AES-1** The new OADS shall include an operating mechanism (hardware or software controlled) that turns off the display or turns it to all black in the event of a malfunction or failure in any system or subsystem that results in the display wholly or partly appearing to flash.
- MM AES-2** The signage operational lighting parameters shall be provided to the City of Millbrae’s Planning Division for review and approval prior to regular operation of the light-emitting diode (LED) OADS and shall be implemented by the applicant to ensure that no residents or drivers will be adversely affected or impacted by trespass glare lighting.

<sup>13</sup> California Department of Transportation (Caltrans). 2012. Caltrans Division of Research and Innovation, Effects of Outdoor Advertising Displays on Driver Safety, p.9. October 11.

<sup>14</sup> United States Department of Transportation (USDOT). 2007. Fed. Highway Admin., Guidance On Off-Premise Changeable Message Signs, p.2. September 25.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.2 Agriculture and Forestry Resources</b> <i>Would the project:</i>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

### Setting

There are no agricultural lands or forested areas within the immediate project area. The California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (FMMP) produces maps that display farmland within the State. There are no agricultural lands or forested areas within the project site. The DOC Inventory Map confirms that the project site is classified as Urban and Built-Up Land.<sup>15</sup>

Would the project:

- a) **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?**

<sup>15</sup> California Department of Conservation (DOC). 2016. California Important Farmland Finder. Website: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed February 15, 2022.

**No impact.** The DOC FMMP mapping designates the project site as Urban and Built-Up Land.<sup>16</sup> Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use. There would be no impact.

**b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?**

**No impact.** The project site is within the MSASP planning area and is zoned as PF, which is reserved for utility-related uses or public services. It is not zoned for agricultural use and the site is not encumbered by a Williamson Act Contract. Therefore, the proposed project would not conflict with existing agricultural zoning or with a Williamson Act Contract. There would be no impact.

**c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**

**No impact.** The project site is zoned as PF, which is reserved for utility-related uses or public services. The project site is not zoned as forest land or timberland. Therefore, the proposed project would not conflict with existing zoning or cause rezoning of forest land or timberland. No impact would occur.

**d) Result in the loss of forest land or conversion of forest land to non-forest use?**

**No impact.** According to the California Public Resources Code, “forest land” is land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.<sup>17</sup> The project site is zoned as PF and is not zoned for forest use. This condition precludes the possibility of a conflict with a forest zoning designation. The project site does not contain nor is adjacent to any forested land. Therefore, there would be no loss of forest land or conversion of forest land to non-forest use because of the proposed project. No impact would occur.

**e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?**

**No impact.** The project site is not adjacent to or in the immediate vicinity of any existing agricultural operations, and the project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance or forest land or timberland. Therefore, the proposed project would not cause any changes in the existing environment that would result in the conversion of any farmland or forest land. There would be no impact.

<sup>16</sup> California Department of Conservation (DOC). 2016. California Important Farmland Finder. Website: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed February 15, 2022.

<sup>17</sup> Thomson Reuters Westlaw. 2019. California Code, Public Resources Code 12220.

## **Mitigation Measures**

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.3 Air Quality</b> <i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.</i> <i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

### Setting

The proposed project is located within the San Francisco Bay Area Air Basin (Air Basin), which consists of the entirety of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara counties; the western portion of Solano County; and the southern portion of Sonoma County. The Air Basin is characterized by complex terrain consisting of coastal mountain ranges, inland valleys, and bays. The regional climate of the Air Basin is characterized by mildly dry summers and moderately wet winters. The region experiences moderate humidity with wind patterns consisting of mild onshore breezes during the day. The location of a strong subtropical high-pressure cell located in the Pacific Ocean induces foggy mornings and moderate temperatures during the summer, as well as occasional rainstorms during the winter.

The air pollutants for which national and State standards have been promulgated and that are most relevant to air quality planning and regulation in the Bay Area include ozone, nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), particulate matter, including dust, 10 micrometers or less in diameter (PM<sub>10</sub>), and particulate matter, including dust, 2.5 micrometers or less in diameter (PM<sub>2.5</sub>). In addition, toxic air contaminants (TACs) are of concern in the Bay Area. Each of these pollutants is briefly described below. Other pollutants that are regulated but not considered an issue in the project area are sulfur dioxide, vinyl chloride, sulfates, hydrogen sulfide, and lead; the proposed project would not emit substantial quantities of those pollutants, so they are not discussed further in this section.

- Ozone is a gas that is formed when reactive organic gases (ROG) and NO<sub>x</sub>—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are conducive to its formation. Its effects can include the following: irritate respiratory system; reduce lung function; cause breathing pattern changes; reduce breathing capacity; inflame and damage cells that line the lungs; make lungs more susceptible to infection; aggravate asthma; aggravate other chronic lung diseases; cause permanent lung damage; cause some immunological changes; increase mortality risk; and cause vegetation and property damage.
- CO is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during winter mornings, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines—unlike ozone—and motor vehicles operating at slow speeds are the primary source of CO in the Bay Area, the highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Potential health effects from CO ranges depending on exposure: slight headaches; nausea; aggravation of angina pectoris (chest pain) and other aspects of coronary heart disease; decreased exercise tolerance in persons with peripheral vascular disease and lung disease; impairment of central nervous system functions; possible increased risk to fetuses; and death.
- PM<sub>10</sub> and PM<sub>2.5</sub> consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. Health effects from short-term exposure (hours per days) can include the following: irritation of the eyes, nose, throat; coughing; phlegm; chest tightness; shortness of breath; aggravation of existing lung disease causing asthma attacks and acute bronchitis; those affected with heart disease can suffer heart attacks and arrhythmias. Health effects from long-term exposure can include the following: reduced lung function; chronic bronchitis; changes in lung morphology; and death.
- TACs refer to a diverse group of air pollutants that can affect human health but have not had ambient air quality standards established for them. Diesel particulate matter (DPM) is a toxic air contaminant that is emitted from construction equipment and diesel-fueled vehicles and trucks. Some short-term (acute) effects of DPM exposure include eye, nose, throat, and lung irritation, coughs, headaches, light-headedness, and nausea. Studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems. Human studies on the carcinogenicity of DPM demonstrate an increased risk of lung cancer, although the increased risk cannot be clearly attributed to diesel exhaust exposure.

Construction and operation of the proposed project would be subject to applicable Bay Area Air Quality Management District (BAAQMD) rules and requirements. The BAAQMD CEQA Guidelines were developed to assist local jurisdictions and lead agencies in complying with the requirements of

CEQA regarding potentially adverse impacts to air quality, and have been utilized in the below analysis of the potential air quality impacts of the project.<sup>18</sup>

Would the project:

**a) Conflict with or obstruct implementation of the applicable air quality plan?**

**Less than significant impact with mitigation.** The 2017 Clean Air Plan is the currently applicable regional Air Quality Plan (AQP) for the Air Basin. The primary goals of the 2017 Clean Air Plan are to protect public health and protect the climate. The 2017 Clean Air Plan acknowledges that the BAAQMD's two stated goals of protection are closely related. As such, the 2017 Clean Air Plan identifies a wide range of control measures intended to decrease both criteria pollutants<sup>19</sup> and greenhouse gas (GHG) emissions.<sup>20</sup> Because the proposed project does not involve population or employment growth, determining consistency with the 2017 Clean Air Plan involves assessing whether applicable control measures contained in the 2017 Clean Air Plan are implemented and whether implementation of the proposed project would disrupt or hinder implementation of AQP control measures. The control measures are organized into five categories: stationary and area source control measures, mobile source measures, transportation control measures, land use and local impact measures, and energy and climate measures. The control measures are geared toward traditional land uses (e.g., residential, commercial, and industrial uses) and buildings. None of the control measures contained in the 2017 Clean Air Plan are applicable to the operation of electronic OADSs; however, all projects within BAAQMD's jurisdiction are required to implement the BAAQMD Best Management Practices (BMPs) during construction activities. As discussed in Impact 2.3(b), the proposed project would implement all BMPs for construction activities and would be consistent with the assumptions in the AQP after implementation of MM AIR-1. Furthermore, the proposed project would not include any special features that would disrupt or hinder implementation of the AQP control measures. Therefore, the proposed project would not conflict with or obstruct implementation of the 2017 Clean Air Plan. This impact would be less than significant after mitigation.

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

**Less than significant impact.** The BAAQMD's thresholds of significance represent the allowable amount of emissions a project can generate without generating a cumulatively considerable contribution to regional air quality impacts. Therefore, a project that would not exceed the BAAQMD thresholds of significance on a project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. The region is non-attainment for the federal and State ozone standards, State PM<sub>10</sub> standards, and federal and State PM<sub>2.5</sub> standards.

<sup>18</sup> Bay Area Air Quality Management District (BAAQMD). 2017. CEQA Guidelines. Website: [http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en). Accessed January 19, 2022.

<sup>19</sup> The United States Environmental Protection Agency (EPA) has established National Ambient Air Quality Standards (NAAQS) for six of the most common air pollutants—carbon monoxide, lead, ground-level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide—known as “criteria” air pollutants (or simply “criteria pollutants”).

<sup>20</sup> Bay Area Air Quality Management District (BAAQMD). 2017. Final 2017 Clean Air Plan. Website: [http://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a\\_-proposed-final-cap-vol-1-pdf.pdf?la=en](http://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en). Accessed February 3, 2022.

Impacts related to construction and operations of the proposed project are addressed separately below.

### **Construction Emissions**

Emissions from construction-related activities are generally short-term in duration but may still cause adverse air quality impacts. The proposed project would generate emissions from construction equipment exhaust, worker travel, and fugitive dust. These construction emissions include criteria air pollutants and precursors from the operation of heavy construction equipment. As discussed below, the proposed project's construction emissions would not exceed any significance threshold adopted for this proposed project. Therefore, the proposed project would have a less than significant contribution to cumulative impacts during construction.

### **Construction Fugitive Dust**

For all proposed projects, the BAAQMD requires the implementation of BMPs to ensure that construction-related fugitive dust emissions are considered less than significant. As such, the proposed project would be required to implement MM AIR-1 to ensure construction emission impacts are less than significant, which would apply the following BAAQMD BMPs during construction activities at the proposed new OADS site:

- Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered with non-potable water two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All roadways, driveways, and sidewalks shall be paved as soon as possible.
- Idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of the California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
- A publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours of a complaint or issue notification. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

### **Construction: ROG, NO<sub>x</sub>, PM<sub>10</sub> (exhaust), and PM<sub>2.5</sub> (exhaust)**

Construction emissions were estimated for the activities associated with the installation of the proposed new OADS. Based on applicant-provided information, it is expected that project construction would last 5 days. The construction schedule used to estimate emissions is shown in Table 1. The off-road construction equipment list is shown by construction phase in Table 2. The

exhaust emissions generated by construction equipment are based on the hours of operation, horsepower, and load factors of the equipment. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by CEQA Guidelines. The number of off-site trips assumed to occur during construction of the proposed project is shown in

Table 3. Additional trips were included to account for the transport of material for the construction of OADSs and would represent a conservative estimate.

**Table 1: Project Construction Schedule**

Phase	Total Number of Working Days
Demolition	1
Trenching	1
Grading	1
Building Construction (Installation of Billboard)	1
Paving	1
Source: CalEEMod Output (see Appendix A).	

**Table 2: Construction Equipment Assumptions**

Activity	Equipment	Amount	Hours per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	1	8	81	0.73
	Rubber Tired Bulldozers	1	1	247	0.4
	Tractors/Loaders/Backhoes	2	6	97	0.37
Trenching	Trenchers	1	8	63	0.31
Grading	Graders	1	6	187	0.41
	Rubber Tired Bulldozers	1	6	247	0.4
	Tractors/Loaders/Backhoes	1	7	97	0.37
Building Construction	Cranes	1	4	231	0.29
	Forklifts	2	6	89	0.2
	Tractors/Loaders/Backhoes	2	8	97	0.37
Paving	Cement and Mortar Mixers	4	6	9	0.56
	Pavers	1	7	130	0.42
	Rollers	1	7	80	0.38
	Tractors/Loaders/Backhoes	1	7	97	0.37
Source: CalEEMod Output (see Appendix A).					

**Table 3: Combined Construction Off-site Trips**

Construction Phase	Construction Trips		
	Worker Trips per Day	Vendor Trips per Day	Total Haul Trips
Demolition	10	2	0
Trenching	3	0	0
Grading	8	2	8
Building Construction (Installation of OADS)	8	2	0
Paving	18	2	0
Source: Source: CalEEMod Output (see Appendix A).			

Annual project construction emissions prior to the application of mitigation are shown in Table 4. Average daily construction emissions are compared with the significance thresholds in Table 5.

**Table 4: Annual Construction Emissions (Unmitigated)**

Construction Phase	Tons/Year			
	ROG	NO <sub>x</sub>	PM <sub>10</sub> (Exhaust)	PM <sub>2.5</sub> (Exhaust)
Demolition	<0.1	<0.1	<0.1	<0.1
Trenching	<0.1	<0.1	<0.1	<0.1
Grading	<0.1	<0.1	<0.1	<0.1
Building Construction (Installation of OADS)	<0.1	<0.1	<0.1	<0.1
Paving	<0.1	0.01	<0.1	<0.1
<b>Total Construction Emissions</b>	<b>&lt;0.1</b>	<b>0.02</b>	<b>&lt;0.1</b>	<b>&lt;0.1</b>
Notes: ROG = reactive organic gases NO <sub>x</sub> = oxides of nitrogen PM <sub>10</sub> = particulate matter, including dust, 10 micrometers or less in diameter PM <sub>2.5</sub> = particulate matter, including dust, 2.5 micrometers or less in diameter Sums were calculated using unrounded numbers from the CalEEMod Output. Source: CalEEMod Output (see Appendix A).				

**Table 5: Average Daily Construction Emissions (Unmitigated)**

Parameter	Air Pollutants			
	ROG	NO <sub>x</sub>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1</sup>
Total Emissions (tons/year)	<0.1	0.2	<0.1	<0.1
Total Emissions (lbs/year)	4.10	41.22	1.96	1.82

Parameter	Air Pollutants			
	ROG	NO <sub>x</sub>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1</sup>
Average Daily Emissions (lbs/day) <sup>2</sup>	0.82	8.24	0.39	0.36
<b>Significance Threshold (lbs/day)</b>	<b>54</b>	<b>54</b>	<b>82</b>	<b>54</b>
Exceeds Significance Threshold?	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Notes: lbs = pounds ROG = reactive organic gases NO <sub>x</sub> = oxides of nitrogen PM <sub>10</sub> = particulate matter, including dust, 10 micrometers or less in diameter PM <sub>2.5</sub> = particulate matter, including dust, 2.5 micrometers or less in diameter <sup>1</sup> Exhaust only <sup>2</sup> Calculated by dividing the total lbs by the total 5 working days of construction for the duration of construction. Calculations use unrounded totals. Source: CalEEMod Output (see Appendix A).				

As shown in Table 5, the combined construction emissions from all components of the proposed project are below the recommended thresholds of significance. Therefore, project construction would have a less than significant impact.

## Operational Emissions

The proposed project's operational emissions would not be anticipated to exceed any significance threshold adopted for the proposed project. Therefore, project operations would have a less than significant contribution to cumulative impacts. The proposed project would generate operational emissions principally from vehicle traffic due to maintenance vehicles accessing the site. The following analysis relates to localized and regional criteria pollutant impacts. Emissions resulting from various aspects of the proposed project are discussed separately below.

### **Operations: ROG, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>**

The BAAQMD has developed screening criteria whereby an agency can quickly determine whether a given development project has the potential to exceed adopted significance thresholds. If all screening criteria are met by a proposed project, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. Although the screening criteria do not include a category for billboards, a comparison to the land uses in that screening table can be used to inform the operational analysis. For comparison, the BAAQMD has determined that a multi-family apartment development would need to construct greater than 451 units to exceed emission significance thresholds during project operation. During operation, the proposed project would operate a new electronic OADS, which would require minimal and irregular maintenance vehicle trips which would occur only as needed (for example, less than once per month and likely only one vehicle). Additionally, project operations would not include other sources of emissions as the proposed project would be limited to the operation of an electronic OADS and would not include other land uses, such as an industrial processing facility or a gas station. As such, operation of the proposed project would entail significantly less activity than operation of a 451-unit apartment building. Accordingly, operational criteria pollutant emissions would not be anticipated to

exceed the recommended thresholds of significance. Therefore, the proposed project's long-term operational impacts would be less than significant.

### **Operational CO Hotspots**

CO emissions from project-related traffic would be the pollutant of greatest concern at the local level because congested intersections with large volumes of traffic have the greatest potential to cause high, localized concentrations of CO.

The BAAQMD recommends a screening analysis to determine whether a project has the potential to contribute to a CO hotspot. The screening criteria identify when subsequent site-specific CO dispersion modeling is necessary.

The BAAQMD considers a project's local CO emissions to be less than significant if one of the following screening criteria is met:

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

Billboards require occasional upkeep and maintenance activities, which generate vehicle trips. The long-term operation of the proposed OADS would include vehicle trips with minimal and irregular maintenance activities, occurring only as needed (less than once per month and likely only one vehicle). The expected increase in traffic would not substantially increase traffic volumes at any affected intersection. Therefore, the proposed project would not exceed the CO screening criteria. Furthermore, the adjacent roadways are not located in an area where vertical or horizontal mixing is substantially limited. Therefore, based on the above criteria, the proposed project would have a less than significant impact related to CO hotspots.

### **c) Expose sensitive receptors to substantial pollutant concentrations?**

**Less than significant impact.** The BAAQMD considers a sensitive receptor to be any facility or land use that includes members of the population who are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. If a project is likely to be a place where people live, play, or convalesce, it should be considered a receptor. It should also be considered a receptor if sensitive individuals are likely to spend a significant amount of time there. Examples of receptors include residences, schools and school yards, parks and playgrounds, daycare centers, nursing homes, and medical facilities. Playgrounds could be play areas associated with parks or community centers. The proposed new OADS site is located in the vicinity of sensitive receptors,

including single-family homes. The closest sensitive receptors are existing residential homes located approximately 900 feet west from the project site.

The following analysis evaluates whether the proposed project would result in construction or operational-period impacts to sensitive receptors. The following three criteria were applied to determine whether project emissions would result in less than significant impacts to sensitive receptors:

**Criterion 1:** Construction of the project would not result in localized emissions that, if when combined with background emissions, would result in exceedance of any health-based air quality standard.

**Criterion 2:** Operation of the project would not result in localized emissions that, if when combined with background emissions, would result in exceedance of any health-based air quality standard.

**Criterion 3:** Construction of the project would not result in an exceedance of asbestos exposure.

***Criterion 1: Project Construction Toxic Air Pollutants***

The proposed project would generate TACs, such as DPM, during construction due to the use of off-road construction equipment. DPM is represented as exhaust emissions of PM<sub>2.5</sub> and PM<sub>10</sub>. As shown in Table 5, project construction would emit at most 0.39 and 0.36 pounds per day of PM<sub>10</sub> and PM<sub>2.5</sub>. As discussed in Impact 2.3(b), emissions during construction would not exceed the BAAQMD's significance thresholds for PM<sub>2.5</sub> and PM<sub>10</sub> and would not be expected to result in concentrations that could exceed ambient air quality standards or contribute substantially to an existing exceedance of an ambient air quality standard. Moreover, construction would occur over 5 days, resulting in a very short exposure duration should the construction emissions reach nearby sensitive receptors. In addition, as the closest sensitive receptors to the location of the proposed OADS would be approximately 900 feet away and construction would occur for only 5 days, construction emissions would likely dissipate before reaching the closest residences 900 feet away. Finally, as prevailing wind conditions in the San Francisco Bay Area predominantly trend westerly, meaning they predominantly originate from a western direction, construction emissions are expected to on average blow in an eastern direction away from the closest sensitive receptors. Therefore, construction of the proposed project would not result in significant emissions of TACs. Impacts relating to Criterion 1 would be less than significant.

***Criterion 2: Project Operation Localized Emissions***

The proposed project would entail the operation of an LED OADS, which has no localized emissions. Maintenance would involve infrequent trips to the sites, usually involving only one light vehicle. Therefore, the proposed project would not expose sensitive receptors to substantial criteria air pollutant concentrations during operation or result in localized emissions that, when combined with background emissions, would result in exceedance of any health-based air quality standard. Impacts relating to Criterion 2 would be less than significant.

### Criterion 3: Asbestos from Demolition

The proposed project would remove approximately 6-inch diameter of asphalt, a tree, and a few sewage tanks. As discussed in Section 2.9, Hazards and Hazardous Materials, there is potential for asbestos-containing materials to be present within the project area because of the presence of structures that predate the federal prohibition of asbestos-containing materials. Any demolition of existing buildings and structures would be subject to BAAQMD Regulation 11, Rule 2 (Asbestos Demolition, Renovation, and Manufacturing),<sup>21</sup> which is intended to limit asbestos emissions from demolition or renovation of structure and the associated disturbance of asbestos-containing waste material generated or handled during these activities. By complying with BAAQMD Regulation 11, Rule 2, thereby minimizing the release of airborne asbestos emissions, demolition activity would not result in a significant impact to air quality. Impacts relating to Criterion 3 would be less than significant.

**d) Result in other emission (such as those leading to odors) adversely affecting a substantial number of people?**

**Less than significant impact.** The proposed project would not be a source of other emissions, such as those leading to odors, during operations. During construction, a limited number of diesel engines would be operated on the project site for limited durations. Diesel exhaust and volatile organic compounds (VOCs) from these diesel engines would be emitted during construction of the proposed project, which are objectionable to some; however, the duration of construction activities is expected to last 5 days. Emissions would disperse rapidly from the project site, and diesel exhaust odors would be consistent with existing vehicle odors in the area. Considering this information, construction and operation of the proposed project would not create other emissions or odors adversely affecting a substantial number of people; impacts would be less than significant.

## Mitigation Measures

**MM AIR-1 Implement BAAQMD Best Management Practices During Construction.**

All construction projects under the implementation of the General Plan shall incorporate the most recent Best Management Practices (BMPs) as required by the Bay Area Air Quality Management District (BAAQMD). Therefore, the BMPs, as recommended by the BAAQMD, shall be implemented during construction:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered with non-potable water two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

<sup>21</sup> Bay Area Air Quality Management District (BAAQMD). 1998. Regulation 11, Rule 2. Website: [https://www.baaqmd.gov/~media/dotgov/files/rules/reg-11-rule-2-asbestos-demolition-renovation-and-manufacturing/documents/rg1102.pdf?la=en](https://www.baaqmd.gov/~/media/dotgov/files/rules/reg-11-rule-2-asbestos-demolition-renovation-and-manufacturing/documents/rg1102.pdf?la=en). Accessed February 10, 2022.

- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks shall be paved as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of the California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
- A publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours of a complaint or issue notification. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.4 Biological Resources</b> <i>Would the project:</i>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

### Setting

This section evaluates potential effects on biological resources that may result from the construction of one, 45-foot-high OADS within the northwestern corner of the project site. Prior to the field survey, a FirstCarbon Solutions (FCS) Biologist reviewed the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDDB), a special-status species and plant community account database; the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) system; and the California Native Plant Society (CNPS) Electronic

Inventory (CNPSEI) of Rare and Endangered Vascular Plants of California database for the *Montara Mountain, California*, United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle Map and the five surrounding quadrangles (Appendix B). A six-quadrangle search was undertaken rather than the standard nine quadrangle search due to the location of the project site relative to the to the coast of San Francisco Bay. USGS does not publish 7.5-minute topographical quadrangle maps within non-terrestrial locations. An on-site assessment of biological resources was completed by qualified FCS Biologist, Robert Carroll on February 4, 2022.

The habitat present within the entire 2.07-acre project site can be categorized as Urban/Developed. This habitat is classified as areas that have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported and retains no soil substrate. Developed land is characterized by permanent or semi-permanent structures, pavement, or hardscape, and landscaped areas that often require irrigation.

The project site is situated in a highly developed area and is currently used by the City of Millbrae as a wastewater treatment facility with associated office buildings. The project site is triangular and bounded by US-101 to the west, Millbrae Avenue to the south, South McDonnell Road to the north, and a surface level parking lot to the east. SFO is located approximately 0.1-mile north of the project site. An approximate 8-foot-high chain link fence divides the project site from surrounding uses. The project site is devoid of vegetation, except the western edge of the project site, which contains one tree, a coast live oak (*Quercus agrifolia*). Additionally, a row of ornamental trees is located off-site between Millbrae Avenue and the project site.

Would the project:

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?**

**Less than significant with mitigation incorporated.**

### **Special-status Plant Species Potentially Occurring Within the Project Site**

The potential for plant species to occur on the project site was evaluated based on the presence of suitable habitats, soil types, and occurrences recorded by the CNPS and CNDDDB listings in the generally vicinity of the site, as well as a site survey conducted by a qualified Biologist. The Special Status Plant Species Evaluation (Table 1; Appendix B) provides a summary of the listing status, habitat requirements, and the potential for occurrence of other sensitive plant species that have been documented within the *Montara Mountain, California*, USGS 7.5-minute Topographical Quadrangle Map and the five surrounding quadrangles. A total of 23 special-status plant species were evaluated for their potential to occur within the project site.

The species evaluated in the Special Status Plant Species Evaluation Table require specific habitat conditions (e.g., coastal scrub, riparian woodland, chaparral, serpentine outcrops, or valley and foothill grasslands) that are not present within the project site. Because of previous development, no

special-status plant species have potential to occur within the project site; therefore, no special-status plant species would be impacted by the proposed OADS.

### **Special-status Wildlife Species Potentially Occurring Within the Project Site**

The potential for wildlife species to occur on the project site was evaluated based on the presence of suitable habitats, and occurrences recorded by the CNDDDB in the generally vicinity of the site, as well as a site survey conducted by a qualified Biologist. The Special Status Wildlife Species Evaluation (Table 2; Appendix B) provides a summary of the listing status, habitat requirements, and the potential for occurrence of other sensitive wildlife species that have been documented within the *Montara Mountain, California*, USGS 7.5-minute Topographical Quadrangle Map and the five surrounding quadrangles. A total of 19 special-status wildlife species were evaluated for their potential to occur within the project site. The special-status species evaluated require specific habitat conditions (e.g., coastal forests, streams, grasslands, marshes, wetlands, cliffs, etc.) that are not present within the project site. Because of previous development and an overall lack of suitable habitats present, no special-status wildlife species have potential to occur within the project site; therefore, no special-status wildlife species would be impacted by the proposed OADS.

### **Migratory Birds**

Migrating birds can be affected by human-built structures because of their propensity to migrate at night, their low flight altitudes, and their tendency to be disoriented by artificial light, which makes them vulnerable to collision with obstructions that could potentially lead to injury or mortality. In addition, birds migrating at night can be strongly attracted to sources of artificial light, particularly during periods of inclement weather. The proposed electronic OADS would not create a substantial change in illumination levels as described above in Section 2.1 above. Baseline light sources in the general project area include local street lighting, parking lot lighting, other electronic billboards at nearby hotels, headlights from automobile traffic, and highway lighting structures. The OADS would never operate at more the one-sixth of the maximum brightness level for electronic displays as set forth by California State law. Additionally, the maximum ambient light output level of the LED panels would be 0.3 foot-candles at 250 feet, which is a more conservative lighting intensity standard for electronic billboards of this proposed size when compared to State standards. For these reasons the proposed electronic OADS would not have a significant impact on the movement of migrating birds.

### **Nesting Birds**

The trees present on the project site and immediate vicinity may provide suitable habitat for a variety of species of nesting birds. Construction activities that occur during the avian nesting season (generally February 1 to August 31) could disturb nesting sites for bird species protected under the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. Given the potential for these species to occur on or near the project site, implementation of MM BIO-1 would reduce potential impacts to non special-status nesting birds to less than significant by requiring pre-construction surveys and implementation of nest protection buffers to avoid disturbance of any active nests.

- b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?**

**No Impact.** The project site is entirely developed and does not contain any riparian habitat or other sensitive natural communities. Therefore, development of the proposed project would have no impact.

- c) **Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

**No impact.** The project site is entirely developed and does not contain any State or federally protected wetlands. Therefore, development of the proposed project would have no impact.

- d) **Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?**

**Less than significant impact.** The project site is entirely developed and surrounded by dense urban development in all directions. The site does not contain any natural or man-made features that could serve as a suitable corridor for wildlife movement. Additionally, the project site is not part of or within a wildlife movement corridor. As such, development of the proposed project would not substantially interfere with the movement of wildlife or impede the use of wildlife nursery sites and impacts would be less than significant.

- e) **Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

**No impact.** The City of Millbrae Tree Ordinance (Chapter 8.60) regulates the protection of City street trees. The City's Tree Ordinance requires a permit to remove, prune, or alter any street trees within the city limits. The proposed project is not anticipated to impact street trees, but if the alternation, removal, or pruning of any street trees is required as part of project development, the project would be required to procure the necessary permits. As such, there would be no conflicts with any local policies or ordinances protecting biological resources.

- f) **Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?**

**No impact.** The project site does not lie within the boundaries of any an adopted Habitat Conservation Plan or Natural Community Conservation Plan or any other approved local, regional, or State habitat conservation plan. As such, development of the proposed project would have no conflict and therefore no impact.

## Mitigation Measures

### MM BIO-1      Nesting Birds

If any tree removal is necessary, then it shall occur outside the nesting season between September 1 through January 31, if feasible. If trees cannot be removed outside the nesting season, then pre-construction surveys shall be conducted no more than 5 days prior to tree removal to verify the absence of active nests if the removal of any trees is scheduled between February 1 and August 31.

If a protected active nest is located during pre-construction surveys, construction activities shall be restricted as necessary to avoid disturbance and nest abandonment. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment) or alteration of the construction schedule.

For nests of all species protected under Fish and Game Code and/or Migratory Bird Treaty Act (MBTA), construction activities shall be restricted as necessary to avoid disturbance of the nest until the young have left the nest, or the United States Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW) (as appropriate) deem disturbance potential to be minimal. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment at a minimum radius of 100 feet around an active raptor nest and an appropriate radius around an active protected bird nest depending on the species and disturbance level as determined by a qualified Biologist) or alteration of the construction schedule.

A qualified Biologist shall determine an appropriately sized buffer around the active nest depending on the species. The applicant shall implement the buffer using environmentally sensitive area fencing, pin flags, and or yellow caution tape. The buffer zone shall be maintained around the active nest site(s) until the young have fledged and are foraging independently.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.5 Cultural Resources and Tribal Cultural Resources</b>				
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i>				
d) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

### Setting

This section describes the existing cultural resources and Tribal Cultural Resource (TCR) setting and potential impacts from the proposed project implementation. The descriptions and analysis in this section are based, in part, on information provided by the California Native American Heritage Commission (NAHC), Northwest Information Center (NWIC), National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historical Landmarks list, California Points of Historical Interest list (CPHI), California Built Environment Resource Directory (BERD) for San Mateo County. Relevant non-confidential records search results and NAHC correspondence are provided in Appendix C.

### ***Northwest Information Center***

A records search and literature review were conducted on February 23, 2022, at the NWIC located at Sonoma State University in Rohnert Park for the project site and the 0.5-mile radius surrounding the proposed project site. The purpose of this review was to access existing cultural resource survey reports, archaeological site records, historic aerial photographs, and historic maps and evaluate whether any previously documented prehistoric or historic archaeological sites, architectural resources, cultural landscapes, or other resources exist within or near the proposed project site.

The results from the records search indicated that there are 12 historic resources within the 0.5-mile search radius, none of which are located within the proposed project site. In addition, four area-specific survey reports are on file with the NWIC for the 0.5-mile search radius, with reports S-012201 and S-038684 encompassing the proposed project site entirely and reports S-049125 and S-004885 partially within the proposed project boundaries. This suggests that the project site has been previously surveyed for cultural resources. A records search map identifying the project boundaries and a 0.5-mile search radius along with relevant non-confidential records search results can be found in Appendix C.

### ***Native American Heritage Commission***

On January 27, 2022, FCS sent a request to the NAHC in an effort to determine whether any sacred sites are listed on its Sacred Lands File (SLF) for the proposed project site and its 0.5-mile search radius. A response was received on March 17, 2022, indicating that the SLF search was positive for the presence of Native American cultural resources in the immediate proposed project area. The NAHC included a list of eight tribal representatives that may offer additional information regarding the proposed project. To ensure that all Native American knowledge and concerns over potential TCRs that may be affected by the project are addressed, FCS sent a letter containing project information and requesting any additional information to each Tribal Representative on March 17, 2022. No responses have been received to date. Government to government consultation pursuant to Assembly Bill (AB) 52 is being handled by the Lead Agency. Correspondence related to the NAHC record searches and tribal representatives can be found in Appendix C.

### ***Pedestrian Field Survey***

On February 23, 2022, FCS Senior Archaeologist Dr. Dana DePietro surveyed the project site to identify any unrecorded cultural resources within the project boundary. The site is situated within a San Mateo County water reclamation facility and is completely hardscaped. Ground disturbance will be limited to the OADS footings and cut into existing concrete and asphalt. There is an existing tree situated in the project site, however all visible associated soils were obscured with imported bark and ground cover. Survey conditions were documented using digital photographs and field notes. During the survey, Dr. DePietro examined all areas of the exposed ground surface for prehistoric artifacts (e.g., fire-affected rock, milling tools, flaked stone tools, tool-making debris, ceramics), soil discoloration and depressions that might indicate the presence of a cultural midden, faunal and human osteological remains, and features indicative of the former presence of structures or buildings (e.g., postholes, standing exterior walls, foundations) or historic debris (e.g., glass, metal, ceramics).

No indications of historic or prehistoric archaeological resources were found over the course of the pedestrian survey, however visibility of any native soils was not possible due to the entirely hardscaped nature of the site. Pedestrian survey photos can be found in Appendix C.

## Cultural Resources

Would the project:

- a) **Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?**

### No impact

CEQA Guidelines Section 15064.5 defines “historic resources” as resources listed in the CRHR, a local register, determined significant by the Lead Agency, or determined to be eligible by the California Historical Resources Commission for listing in the CRHR. The criteria for eligibility are generally set by the National Historic Preservation Act of 1966, which established the NRHP, and which recognizes properties that are significant at the national, State, and local levels. To be eligible for listing in the NRHP and CRHR, a district, site, building, structure, or object must possess integrity of location, design, setting, materials, workmanship, feeling, and association relative to American history, architecture, archaeology, engineering, or culture. In addition, unless the property possesses exceptional significance, it must be at least 50 years old to be eligible.

The records search results conducted at the NWIC for the proposed project site identified 12 historic resources within the 0.5-mile search radius, none of which are located within the proposed project site. Additionally, the pedestrian field survey failed to locate or identify any built environment historical resources. Therefore, there will be no project-related impacts to built environment historical resources.

- b) **Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

**Less than significant impact with mitigation incorporated.** Section 15064.5 of the CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-related significant adverse effect could occur if a project were to affect archaeological resources that fall under these categories.

The records search results conducted at the NWIC for the proposed project site identified 12 historic resources within the 0.5-mile search radius, and failed to identify any prehistoric archaeological resources within or near the project site. In addition, the results of the pedestrian survey did not locate or identify any archaeological resources. Given the hardscaped nature of the project site, the potential to impact an unidentified archaeological resource is considered low. Nevertheless, it is possible that earthmoving activities associated with project construction could encounter previously undiscovered archaeological resources. Archaeological resources can include but are not limited to stone, bone, wood or shell artifacts or features, including hearths and structural elements. Damage

or destruction of these resources would be a potentially significant impact. Implementation of MM CUL-1 would ensure that this potential impact is reduced to a less than significant level.

**c) Disturb any human remains, including those interred outside of formal cemeteries?**

**Less than significant impact with mitigation incorporated.** The project site is significantly disturbed and entirely developed, the potential for the disturbance of any human remains is considered low. While it is unlikely that the presence of human remains exists within or near the project site, there is a possibility that earthmoving activities associated with project construction could potentially damage or destroy previously undiscovered human remains.

In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and 5097.98 must be followed. MM CUL-2 further specifies the procedures to follow in the event human remains are uncovered. Along with compliance with these guidelines and statutes, implementation of this mitigation would reduce potential impacts related to human remains to a less than significant level.

**Tribal Cultural Resources**

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

**d) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or**

**Less than significant impact with mitigation incorporated.** A review of the CRHR, local registers of historic resources, and a records search conducted at the NWIC failed to identify any listed TCRs that may be adversely affected by the proposed project. Nevertheless, the NAHC SLFs positive search results raise the potential of TCRs that may be affected by the proposed project. Should any undiscovered TCRs be encountered during project construction, implementation of MM CUL-1 and MM CUL-2, would reduce potential impacts to a less than significant level

**e) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

**Less than significant impact with mitigation incorporated.** No TCRs significant to the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 have been identified by the Lead Agency. FCS conducted tribal outreach with the eight tribal representatives identified by the NAHC. In compliance with AB 52, the City distributed letters to Native American tribes that have previously requested notification for AB 52 consultation, notifying each tribe of the opportunity to consult with

the City regarding the proposed project. Consultation letters were mailed on March 31, 2022. At the time of this publication, no requests for consultation have been received.

## Mitigation Measures

**MM CUL-1** An Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology shall perform an inspection of the site for potential archaeological resources once ground clearing, and demolition are complete, and prior to any grading or project-related ground disturbance. In the event exposed soils indicate cultural materials may be present, this may be followed by regular or periodic archaeological monitoring as determined by the Archaeologist, but full-time archaeological monitoring is not recommended at this time.

It is always possible that ground-disturbing activities during construction may uncover previously unknown, buried cultural resources. In the event that buried cultural resources are discovered during construction, operations shall stop in the immediate vicinity of the find and a qualified Archaeologist shall be consulted to determine whether the resource requires further study. The qualified Archaeologist shall make recommendations to the Lead Agency on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Potentially significant cultural resources consist of but are not limited to stone, bone, fossils, wood, or shell artifacts or features, including hearths, structural remains, or historic dumpsites. Any previously undiscovered resources found during construction within the project area should be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria.

If the resources are determined to be unique historic resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the Archaeological Monitor and recommended to the Lead Agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds.

No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the Lead Agency where they would be afforded long-term preservation to allow future scientific study.

**MM CUL-2** Public Resources Code Section 15064.5 requires the following relative to Native American remains:

When an initial study identifies the existence of, or the probable likelihood of, Native American remains within a project footprint, the Lead Agency shall work with the appropriate Native Americans as identified by the NAHC as provided in Public Resources Code Section 5097.98. The applicant may develop a plan for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials with the appropriate Native Americans as identified by the NAHC."

In the event of an accidental discovery or recognition of any human remains, Public Resources Code Section 5097.98 must be followed. In this instance, once project-related earthmoving begins and if there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the County Coroner is contacted to determine whether the remains are Native American and if an investigation of the cause of death is required. If the Coroner determines the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the "most likely descendant" of the deceased Native American. The Most Likely Descendant (MLD) may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains, and any associated grave goods as provided in Public Resources Section 5097.98, or
2. Where the following conditions occur, the landowner or his/her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the MLD or on the project site in a location not subject to further subsurface disturbance:
  - The NAHC is unable to identify a MLD or the MLD failed to make a recommendation within 48 hours after being notified by the commission.
  - The descendant identified fails to make a recommendation.
  - The landowner or his authorized representative rejects the recommendation of the descendant, and the mediation by the NAHC fails to provide measures acceptable to the landowner.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.6 Energy</b> <i>Would the project:</i>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

### Setting

#### Energy Basics

Energy use, especially through fossil fuel consumption and combustion, relates directly to environmental quality since it can adversely affect air quality and generate GHG emissions that contribute to climate change. Electrical power is generated through a variety of sources, including fossil fuel combustion, hydropower, wind, solar, biofuels, and others. Natural gas is widely used to heat buildings, prepare food in restaurants and residences, and fuel vehicles, among other uses. Fuel use for transportation is related to the fuel efficiency of cars, trucks, and public transportation; choice of different travel modes such as auto, carpool, and public transit; and miles traveled by these modes, and generally based on petroleum-based fuels such as diesel and gasoline. Electric vehicles may not have any direct emissions but do have indirect emissions via the source of electricity generated to power the vehicle. Construction and routine operation and maintenance of transportation infrastructure also consume energy.

#### Regulatory Framework

The City of Millbrae Climate Action Plan (CAP) was approved and adopted on October 27, 2020.<sup>22</sup> The CAP sets policies, GHG emissions reduction targets, and measures for reducing GHG emissions, and is considered a qualified GHG reduction strategy under CEQA. The CAP was developed to promote green jobs, to comply with State environmental initiatives, and to promote sustainable development. The following measures reduce energy consumption as well as GHG emissions:

**Commercial Green Building Ordinance.** The City will continue to adopt the latest version of the California Green Building Standards Code (CALGreen) for nonresidential new construction and major remodels for applicable updates outside of the Reach Codes.

<sup>22</sup> City of Millbrae. 2020. Climate Action Plan. Website: <https://www.ci.millbrae.ca.us/departments-services/public-works/climate-action-plan>. Accessed February 10, 2022.

**Commercial Energy Efficiency Programs.** Through marketing and outreach, the City promotes participation in commercial energy efficiency programs and demand response programs offered by San Mateo County Energy Watch (SMC Energy Watch) and Pacific Gas and Electric Company (PG&E)–including PG&E appliance rebates, 0 percent energy efficiency financing, and demand response programs. City will encourage commercial energy audits.

**Commercial Energy Conservation Program.** Initially start a voluntary commercial energy conservation program, whereby the City would encourage minimum energy efficiency and water efficiency standards at the time of building sale. Transition to mandatory commercial energy conservation ordinance over time.

**Electric Vehicle Education and Outreach.** Increase number of electric vehicles that are owned by residents, commuters, and visitors to the City through education and outreach focused on the benefits of electric vehicles.

**EV Charging Infrastructure in New Construction.** Adopt Reach Code to update the residential and commercial building code to increase the mandated percentage of parking spaces designed to accommodate electric vehicle charging equipment and also increase the mandated percentage of parking spaces devoted to clean air vehicles (electric vehicles [EVs], Plug-in Hybrid-Electric Vehicles [PHEVs], carpools).

**Electric Transportation Network Company Vehicles.** Develop policies, such as a revenue neutral fee that only applies to internal combustion engine Transportation Network Company (TNC), to encourage the use of EV TNCs in the community. Utilize funds generated by fees to provide discounts on EV TNC rides. Provide designated drop-off locations and charging locations for EV TNCs to facilitate EV adoption.

**Clean Fleet Policy.** Prioritize purchase of battery electric, plug-in hybrid-electric, and traditional hybrid vehicles. Maintain existing vehicles for optimum mileage. Encourage staff to drive minimally and efficiently. Expand on the idling policy.

According to Appendix G, Environmental Checklist of the CEQA Guidelines, energy impacts resulting from the implementation of the proposed project would be considered significant if the project would:

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
- b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

These criteria are further analyzed in the following sections.

Would the project:

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

**Less than significant impact.** A discussion of the proposed project's energy use is presented below. Energy use consumed by the proposed project is primarily based on comparison with similar electronic billboard development projects and empirical studies which are publicly available. For the purpose of this energy analysis, the anticipated operational electricity consumption relies on information provided by the applicant. Energy calculations and supporting information are included as part of Appendix A of this Draft IS/MND.

## Construction

During construction, the proposed project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment, and the use of electricity for temporary buildings, lighting, and other sources. No natural gas would be utilized as part of construction. Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during demolition, grading, paving, and building construction activities. The types of equipment could include gasoline- and diesel-powered construction and transportation equipment, including trucks, bulldozers, frontend loaders, forklifts, and cranes. Other equipment could include electrically driven equipment such as pumps and other tools.

Based on California Emissions Estimator Model (CalEEMod) estimates for the proposed project, (see modeling output files in Appendix A), construction-related worker vehicle trips would consume an estimated 46 gallons of diesel and gasoline, combined, and construction-related equipment would consume an estimated 224 gallons of diesel and gasoline, combined, during project construction. Additionally, single-wide mobile office trailers, generally ranging in size from 160 square feet to 720 square feet, are commonly used in construction staging areas. The use of a 720-square-foot construction trailer would consume approximately 119 kilowatt-hours (kWh) during the 5-day construction schedule (see Appendix A for calculations).

Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California Code of Regulations Title 13, Sections 2449(d)(3) and 2485 limit idling from both on-road and off-road diesel-powered equipment and are enforced by the California Air Resources Board (ARB). In addition, given the cost of fuel, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

Because of the temporary nature of construction and the financial incentives for developers and contractors to implement energy-efficient practices, project construction activities would not result in wasteful, inefficient, and unnecessary consumption of energy. Therefore, the construction-related impact related to fuel and electricity consumption would be less than significant.

## Operation

### ***Electricity and Natural Gas***

Building operations for the proposed project would involve energy consumption for lighting. Based on Applicant-provided information, the proposed two-sided LED billboard would be operated 24 hours per day, 365 days per year, which would consume an estimated 52,400 kWh of electricity. The

proposed project is not anticipated to result in wasteful, inefficient, or unnecessary electricity consumption as the electronic billboard would require electricity to operate and would not facilitate greater electricity consumption beyond that required for their passive operative design. Moreover, the electronic billboard would not consume natural gas and would rely on increasingly renewable energy sources consistent with Senate Bill (SB) 100.<sup>23</sup> Therefore, the operational impact related to building electricity and natural gas consumption would be less than significant.

### **Fuel**

Long-term operational energy consumption related to fuel consumption would be minimal because the only vehicle trips would be from irregular and infrequent maintenance vehicle trips.

Maintenance vehicle trips associated with the proposed project are anticipated to occur on average less than once per month. Additionally, as the City and the State work toward better transportation circulation and more fuel-efficient vehicles, the energy associated with maintenance vehicle trips would not result in wasteful, inefficient, or significant energy use. This impact would be less than significant.

#### **b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency**

**Less than significant impact.** A discussion of the proposed project's potential to conflict with or obstruct a State or local plan for renewable energy or energy efficiency is presented below.

### **Construction**

As described above, construction activities would involve energy consumption in various forms and would be limited by California regulations such as California Code of Regulations Title 13, Sections 2449(d)(3) and 2485 which limit idling from both on-road and off-road diesel-powered equipment and are enforced by the ARB. The proposed project would be required to comply with these regulations. There are no renewable energy standards applicable to construction activities for the proposed project.

Thus, it is anticipated that construction of the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy. Therefore, impacts would be less than significant.

### **Operation**

Additionally, the proposed project would consume electricity delivered by a California utility during operation. According to SB 100, California's Renewables Portfolio Standard (RPS) requires that 100 percent of electricity retail sales in California be sourced with renewable energy sources by 2045. PG&E would provide electricity to the proposed project through the existing grid. SB 32 mandates a Statewide GHG emissions reduction goal to 40 percent below 1990 levels by the year 2030. Further, Executive Order B-55-18 establishes a new Statewide goal to achieve carbon neutrality by 2045 at the latest and maintain net negative emissions after 2045.<sup>24</sup> Therefore, the proposed project would

<sup>23</sup> California Legislative Information. 2018. Senate Bill 100. Website: [https://leginfo.ca.gov/faces/billTextClient.xhtml?bill\\_id=201720180SB100](https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB100). Accessed February 3, 2022.

<sup>24</sup> State of California. Executive Order B-55-18 to Achieve Carbon Neutrality. <https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>. Accessed February 10, 2022.

receive electricity from a utility company that meets California's RPS requirements as well as the State requirements through 2045.

In addition, the proposed project would be designed and constructed in accordance with the applicable State's Title 24 energy efficiency standards. Part 11, Chapter 4 and 5 of the State Title 24 energy efficiency standards establishes mandatory measures for nonresidential buildings, including material conservation and resource efficiency. The proposed project would be required to comply with these mandatory measures and would be constructed in accordance with City standards. Thus, the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy. This impact would be less than significant.

## **Mitigation Measures**

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.7 Geology and Soils</b> <i>Would the project:</i>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

### Setting

The Northern California region contains several active, potentially active, and inactive faults, and it is considered a region of high seismic activity. Based on the City of Millbrae's geographic location between major fault lines and the San Francisco Bay, the City is within a seismically active region.

The project site is located within the Coast Ranges geomorphic province.<sup>25</sup> The Coast Range Geomorphic Province is characterized by a series of northwest-trending mountain ranges and intervening valleys that align subparallel with the San Andreas Fault System.

There are four Seismic Zones in the United States, which are ranked according to their seismic hazard potential. Zone 1 has the least seismic potential and Zone 4 has the highest seismic potential. The seismic zone system is used for building codes, the closer an area to a seismic zone, the higher the seismic hazard zone.<sup>26</sup> According to the General Plan, the City is within the seismic risk Zone 4. The California Building Standards Code (CBC) contains special standards and regulations for each zone to ensure construction would be designed to withstand seismic activity.

Five major faults are located near the City including the San Andreas, Serra, San Gregorio, Hayward, and Calaveras Faults. The San Andreas Fault is located approximately 2.2 miles west of the site and the San Gregorio Fault is located approximately 7.8 miles west of the site. The Hayward and Calaveras Faults are over 15 miles east of the project site. The Serra Fault is located approximately 1.2 miles west of the project site.

Liquefaction is the result of seismic activity and is characterized as the transformation of loosely water-saturated soils from a solid state to a liquid state after ground shaking. Variables that contribute to liquefaction include age of the soil, soil type, soil cohesion, soil density, and groundwater level. Soils most susceptible to liquefaction are loose, uniformly graded, fine-grained sands. According to the California Geologic Survey (CGS) Earthquake Zones of Required Investigation, the project site is located within a Liquefaction Zone.<sup>27,28</sup>

Would the project:

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:**
  - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

**Less than significant impact.** The project site is not located in an Alquist-Priolo Earthquake Fault Zone, although the site is approximately 2 miles east of the Alquist-Priolo Earthquake Fault Zone associated with San Andreas Fault.<sup>29</sup> To ensure the proposed OADS is constructed safely, construction and design would be undertaken using standard engineering and seismic safety design

<sup>25</sup> City of Millbrae. 1998. Millbrae General Plan – Safety Element. November 24.

<sup>26</sup> United States Geological Survey (USGS). No date. What is a seismic zone, or seismic hazard zone? Website: [https://www.usgs.gov/faqs/what-a-seismic-zone-or-seismic-hazard-zone?qt-news\\_science\\_products=0#qt-news\\_science\\_products](https://www.usgs.gov/faqs/what-a-seismic-zone-or-seismic-hazard-zone?qt-news_science_products=0#qt-news_science_products). Accessed February 15, 2022.

<sup>27</sup> California Geologic Survey (CGS). 2021. Earthquake Zones of Required Investigation. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed February 15, 2022.

<sup>28</sup> California Geologic Survey (CGS). 2019. Earthquake Zones of Required Investigation – Montara Mountain Quadrangle Map. April 4.

<sup>29</sup> California Department of Conservation (DOC). 2012. California Geological Survey: Earthquake Zones of Required Investigation, Hayward Quadrangle. September. Website: [http://gmw.consrv.ca.gov/shmp/download/quad/HAYWARD/maps/Hayward\\_EZRIM.pdf](http://gmw.consrv.ca.gov/shmp/download/quad/HAYWARD/maps/Hayward_EZRIM.pdf).

techniques in accordance with the CBC in effect at the time of construction. Therefore, impacts related to potential rupture of a known earthquake fault would be less than significant.

**ii) Strong seismic ground shaking?**

**Less than significant impact.** The project site is in a seismically active region, and strong shaking would be expected during the lifetime of the proposed project, which could damage future improvements on the site. According to the General Plan, structures and utilities of all types may suffer from severe damage or collapse due to ground shaking if not designed to withstand the shaking force from seismic activity.<sup>30</sup> To avoid or minimize potential damage from seismic shaking, the proposed project would be built using standard engineering and seismic safety design techniques in accordance with the CBC in effect at the time of construction. Additionally, the proposed project would comply with General Plan policies from Chapter 8, Safety, related to geologic and seismic hazards (Safety Policies S1.1 through S1.12). For example, the proposed project would comply with Safety Policy S1.3 which requires all geologic hazards to be adequately addressed and mitigated through project development. Therefore, impacts related to seismic ground shaking would be less than significant.

**iii) Seismic-related ground failure, including liquefaction?**

**Less than significant impact.** Liquefaction is the result of seismic activity and is characterized as the transformation of loosely water-saturated soils from a solid state to a liquid state after ground shaking. Variables that contribute to liquefaction include age of the soil, soil type, soil cohesion, soil density, and groundwater level. Soils most susceptible to liquefaction are loose, uniformly graded, fine-grained sands. The project site is in a Liquefaction Zone delineated by CGS.<sup>31</sup> However, the project site is in an urban environment with substantial development having occurred on the site itself and adjacent parcels. In addition, the proposed OADS would not be habitable. To avoid or minimize potential damage from liquefaction, the proposed project would be built using standard engineering and seismic safety design techniques in accordance with the CBC in effect at the time of construction. Furthermore, the proposed project would comply with General Plan policies from Chapter 8, Safety, related to geologic and seismic hazards. For example, the proposed project would comply with Safety Policy S1.7, which ensures the safety of new development on Bay fill against the effects of liquefaction and/or subsidence through proper construction techniques and Safety Policy S1.3, which requires all geologic hazards to be adequately addressed and mitigated through project development. Therefore, impacts related to seismic-related ground failure, including liquefaction would be less than significant.

**iv) Landslides?**

**Less than significant impact.** The General Plan determined that the City is located in an area susceptible to landslides because of the steep slopes within the City; however, the project site is

<sup>30</sup> City of Millbrae. 1998. City of Millbrae General Plan 1998-2015 – Chapter 8 Safety. November 24.

<sup>31</sup> California Geologic Survey (CGS). 2021. Earthquake Zones of Required Investigation. Website: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>. Accessed February 15, 2022.

relatively flat at around 7 feet above sea level. Therefore, the probability of landslides occurring during a seismic event is low. As a result, impacts related to landslides would be less than significant.

**b) Result in substantial soil erosion or the loss of topsoil?**

**Less than significant impact.** The proposed project's earth-disturbing activities consist of drilling a hole (5 feet in diameter and up to 77 feet deep) for the foundation of the OADS. Standard construction practices would be followed to minimize soil erosion during construction of the proposed OADS. Therefore, construction of the proposed OADS would not result in substantial soil erosion or loss of topsoil and impacts would be less than significant.

**c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**

**Less than significant impact.** Lateral spreading typically occurs as a form of horizontal displacement of a relatively flat-lying alluvial material toward an open or "free" face such as an open body of water, channel, or excavation. The project site and surrounding area is relatively flat and the nearest open body of water is the San Francisco Bay located approximately 0.2-mile east of the project site. Although the project site is within proximity to the San Francisco Bay, according to the Web Soil Survey by the United States Department of Agriculture, the project site is not located on expansive soil and is 100 percent underlain by Urban land-Orthents with 0 to 2 percent slopes.<sup>32</sup> Further, the proposed project would not be habitable and is not intended for human occupancy thereby reducing risk to people. As such, the potential for lateral spreading to affect the site is low.

As previously mentioned, the proposed project would implement standard engineering and seismic safety design techniques in accordance with the CBC in effect at the time of construction and comply with General Plan policies outlined in Chapter 8, Safety. For instance, the proposed project would comply with Safety Policy S1.1, Location of Future Develop, which ensures development is only permitted in areas where potential danger to residents can be adequately mitigated to geological hazards due to its location and/or design. Additionally, the proposed project would adhere to Safety Policy S1.4, Seismic Safety to ensure new structures are designed to protect people and property from seismic hazards. Further, the proposed project would also comply with all applicable State and local requirements to minimize impacts related associated with being on an unstable geologic unit. Thus, impacts would be reduced to less than significant levels.

**d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

**Less than significant impact.** According to the Web Soil Survey by the United States Department of Agriculture, the project site is not located on expansive soil.<sup>33</sup> Furthermore, the proposed project does not include construction of any structures intended for human occupancy, which precludes substantial risk to life or property because of expansive soils. According to the Web Soil Survey by

<sup>32</sup> United States Department of Agriculture (USDA). Web Soil Survey. Website: <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>. Accessed February 15, 2022.

<sup>33</sup> Ibid.

the United States Department of Agriculture, the project site is not located on expansive soil. Therefore, the proposed project would not create substantial direct or indirect risks to life or property, and impacts would be less than significant.

- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

**No impact.** The proposed project does not require the use of any septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur.

- f) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

The project is not located in an area with paleontological resources or unique geologic features. Prior excavation has been done on the project site and the likelihood of previously undiscovered paleontological resources is low, according to the Paleontological Records Search prepared by Dr. Kenneth Finger for the site. His report is included in Appendix C.

## Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.8 Greenhouse Gas Emissions</b> <i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

### Setting

Would the project:

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Less than significant impact.** The proposed project is located in the San Francisco Bay Area Air Basin, which is regulated by the BAAQMD. Although the BAAQMD has adopted new thresholds for land use projects, this analysis appropriately uses the thresholds that were in place at the commencement of analysis as determined by the City. GHG emissions are generated during project construction and operation (e.g., mobile emissions, emissions from generation of electricity for operations, and emissions of from the manufacturing and transport of building materials). The BAAQMD's project-level significance threshold for operational GHG generation was deemed appropriate to use when determining the proposed project's potential GHG impacts. The thresholds suggested by the BAAQMD for project-level operational GHG generation are as follows:

- Compliance with a qualified GHG Reduction Strategy,
- 660 metric tons (MT) carbon dioxide equivalent (CO<sub>2</sub>e) per year, or
- 4.6 MT CO<sub>2</sub>e per service population (residents + employees) per year.

This analysis is restricted to GHGs identified by AB 32, which include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Construction and operation of the proposed project are addressed separately below.

### Construction GHG Emissions

During project construction, GHGs would be generated by construction activities such as site clearing, operation of heavy-duty construction vehicles, materials and debris hauling, paving, and construction worker vehicle trips. These emissions would be considered short-term in duration. The

BAAQMD does not have an adopted threshold of significance for construction-related GHG emissions; however, the BAAQMD does recommend that lead agencies quantify, disclose, and provide a significance determination for construction-related GHG emissions. Therefore, the operational emissions bright-line threshold of 1,100 MT CO<sub>2</sub>e per year is used for this analysis to determine significance of the proposed project's construction-related emissions.

Construction emissions were estimated using CalEEMod (Version 2020.4.0). Construction assumptions used to estimate GHG emissions are consistent with those used to estimate air pollutant emissions, as described under Impact 2.3(b). Table 6 shows that GHG emissions generated by project construction were estimated to be 3.3 MT CO<sub>2</sub>e, which is below the 660 MT CO<sub>2</sub>e per year threshold. Therefore, construction-related GHG emissions would be less than significant.

**Table 6: Construction GHG Emissions**

Construction Phase	Total MT CO <sub>2</sub> e/year
Demolition	0.6
Trenching	0.1
Grading	1.0
Building Construction (Installation of Billboard)	0.5
Paving	1.1
<b>Total Construction Emissions</b>	<b>3.3</b>
<b>Threshold of Significance</b>	<b>1,100</b>
<b>Does project exceed threshold?</b>	<b>No</b>
Notes: MT CO <sub>2</sub> e = metric tons of carbon dioxide equivalents Because of rounding, total MT CO <sub>2</sub> e may be marginally different from CalEEMod Output. Source: CalEEMod Output (Appendix A).	

## Operational GHG Emissions

Operational or long-term GHG emissions occur over the life of the proposed project. Sources for operational emissions include:

- **Motor Vehicles:** These emissions refer to tailpipe exhaust from the cars and trucks that would travel to and from the project site.
- **Indirect Electricity:** These emissions refer to those generated by off-site power plants to supply electricity required for the proposed project.
- **Water Transport:** These emissions refer to those generated by the electricity required to transport and treat the water to be used on the project site.
- **Waste:** These emissions refer to the GHG emissions produced by decomposing waste generated by the proposed project.

Motor vehicle, water, and waste sources of GHG emissions would be negligible during operation. LED OADSs (programmable electronic signs) are subject to energy efficiency requirements under Title 24 of the California Code of Regulations. The billboard is required to be dimmable, which would reduce energy use and GHG emissions associated with the generation of electricity. The proposed new OADS would be illuminated 24 hours per day, 365 days per year. The light levels emitted from the billboard would be set to adjust based on ambient light conditions at any given time (i.e., nighttime versus daytime). According to applicant-provided information, a typical Outfront Media billboard would result in an estimated annual electricity demand of 26,200 kWh/year per LED panel. Therefore, it is assumed that the proposed project, which consists of two panels, would use up to a total of 52,400 kWh, or 52.4 megawatt-hours (MWh) per year. PG&E would supply the electrical energy needed to illuminate the billboard.

Billboards require occasional upkeep and maintenance activities, which generate vehicle trips and resulting GHG emissions. These mobile source GHG emissions are difficult to quantify as no data is available at the time of this analysis to accurately represent these maintenance trips. As calculated and contained in Appendix A, electricity consumption resulting from operation of the proposed project would result in approximately 5.2 MT/year of CO<sub>2</sub>e. Additionally, the energy consumption calculations shown in Appendix A demonstrate that the project would not result in a substantial increase in electricity demand and resulting GHG emissions. The proposed project's expected net annual GHG emissions of approximately 5.2 MT CO<sub>2</sub>e/year would not exceed the 660 MT CO<sub>2</sub>e/year threshold, and therefore GHG impacts related to the operation of the proposed project would be less than significant.

**b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**Less than significant impact.** The City of Millbrae's CAP outlines actionable items that, if successfully implemented, would reduce GHG emissions generated within the City to at least 49 percent below 2005 levels by 2030. There are several implementation action items related to energy, most of which relate to energy use in commercial or residential buildings. The proposed project would be consistent with the requirements included in the CAP. As discussed in Impact 2.6(b), the proposed project would receive electricity from a utility company that meets California's RPS requirements as well as the State requirements through 2045, which also reduces the GHG emission intensity of electricity generation. The 2017 Clean Air Plan is also applicable to the project, because the project site is located within the BAAQMD planning area. As described in Impact 2.3(a), none of the control measures contained in the 2017 Clean Air Plan are applicable to the operation of electronic billboards. As discussed in Impact 2.3(b), the proposed project would implement all BMPs for construction activities and would be consistent with the assumptions in the AQP after implementation of MM AIR-1. Furthermore, the proposed project would not include any special features that would disrupt or hinder implementation of the AQP control measures.

The proposed project would not conflict with the policies, regulations, or guidelines in the City's CAP, Bay Area Clean Air Plan, or any other applicable plan and/or regulations adopted for the purposes of reducing GHG emissions. Furthermore, as discussed in Impact 2.8(a), the proposed project would

not generate substantial GHG emissions during construction or operation. Therefore, this impact would be less than significant.

### **Mitigation Measures**

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.9 Hazards and Hazardous Materials</b> <i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

### Setting

This analysis is based, in part, on the Summary of Soil and Groundwater Sampling Activities prepared by Terracon on September 9, 2021 (Appendix D).

The project area contains residential and commercial land uses as well as transportation corridors. The land uses may utilize some hazardous materials through use of cleaning products, and trucks may transport hazardous materials along the transportation corridors. The project site is located approximately 0.1-mile south of SFO.

According to the Hazardous Waste and Substances Site List from the Department of Toxic Substances Control (DTSC), there are no known Cortese List sites (Government Code § 65962.5(a)), listed at the project site.<sup>34</sup> The nearest potential hazardous site is associated with Millbrae BART/Caltrain Station (No. 60002244), located approximately 0.3-mile west of the project site at 200 Millbrae Avenue.<sup>35</sup> The cleanup status is active as of August 2015, and lead from a former ceramics manufacturing facility may be present in on-site soils.

According to the Summary of Soil and Groundwater Sampling Activities, nearby Leaking Underground Storage Tank (LUST) cases were historically recognized due to releases of gasoline or diesel fuel at the project parcel. Case T0608202089 was closed in June 1996 and the underground storage tank (UST) was removed from the property, Case T0000002916 was closed in July 2014 after diesel fuel impacted soil was found in a utility trench—remediation was conducted, and Case T0608100157 was closed in August 2016 after a soil vapor intrusion investigation.<sup>36</sup>

Soil and groundwater samples were taken to evaluate the presence or absence of regulated environmental chemicals that may be encountered during foundation construction of the new OADS. The samples were analyzed for total petroleum hydrocarbons (TPH) as gasoline (TPH-g), TPH as diesel (TPH-d), TPH as motor oil (TPH-mo), and VOCs. Based on review of the analytical results, TPH-g and VOCs were not detected in the soil samples above laboratory reported detection limits. TPH-d and TPH-mo were detected at concentrations of 7.58 milligrams per kilogram (mg/Kg) and 7.83 mg/Kg, respectively. Chromium and lead were detected at concentrations of 76.0 mg/Kg and 23.8 mg/Kg, respectively.<sup>37</sup>

Would the project:

- a) **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**Less than significant impact.** Project construction activities may involve the use, transport, and disposal of hazardous materials such as gasoline, diesel fuel, lubricating oil, hydraulic oil, lubricating grease, automatic transmission fluid, paints, solvents, glues, and other substances used during construction. Construction of the proposed project would also require the use of gasoline- and diesel-powered heavy equipment, such as bulldozers, backhoes, water pumps, and air compressors. If not appropriately managed, accidental spills of these hazardous materials could result in a significant impact.

All construction activities would be required to conform to Title 49 of the Code of Federal Regulations, United States Department of Transportation (USDOT), State of California, and local laws,

<sup>34</sup> EnviroStor. 2022. DTSC Hazardous Waste and Substances Site List. Website: [https://www.envirostor.dtsc.ca.gov/public/search?CMD=search&city=Millbrae&zip=&county=&case\\_number=&business\\_name=&FEDERAL\\_SUPERFUND=True&STATE\\_RESPONSE=True&VOLUNTARY\\_CLEANUP=True&SCHOOL\\_CLEANUP=True&CORRECTIVE\\_ACTION=True&tiered\\_permit=True&evaluation=True&operating=True&post\\_closure=True&non\\_operating=True&inspections=True&inspectionsother=True](https://www.envirostor.dtsc.ca.gov/public/search?CMD=search&city=Millbrae&zip=&county=&case_number=&business_name=&FEDERAL_SUPERFUND=True&STATE_RESPONSE=True&VOLUNTARY_CLEANUP=True&SCHOOL_CLEANUP=True&CORRECTIVE_ACTION=True&tiered_permit=True&evaluation=True&operating=True&post_closure=True&non_operating=True&inspections=True&inspectionsother=True). Accessed February 16, 2022.

<sup>35</sup> EnviroStor. 2022. Millbrae BART (60002244). Website: [https://www.envirostor.dtsc.ca.gov/public/profile\\_report?global\\_id=60002244](https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60002244). Accessed February 16, 2022.

<sup>36</sup> Terracon. 2021. Summary of Soil and Groundwater Sampling Activities. September 9. Page 2.

<sup>37</sup> Ibid.

ordinances, and procedures. Finally, operation of the proposed project would require sporadic maintenance by a negligible number of workers and trucks, and would not involve the use of any hazardous materials with the potential to significantly impact the public. Therefore, with adherence to applicable State, local, and federal requirements, impacts would be less than significant.

Finally, operation of the project would require sporadic maintenance, but would not involve the use of any hazardous materials with the potential to significantly impact the public. Therefore, with adherence to applicable State, local, and federal requirements, impacts would be less than significant.

**b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

**Less than significant impact with mitigation incorporated.** As explained above, construction activities would require the use and transport of potentially hazardous materials, including oils and combustible fuels, but these materials would not be stored in large quantities on-site. The applicant and its contractors must comply with all relevant local, State, and federal regulations related to the handling, transport, and storage of hazardous materials.

Disturbance of on-site soils would be limited to removal of soil in the immediate area of the proposed new billboard site required to install a foundation for the billboard. The foundation at the site would be 5 feet in diameter and up to 77 feet deep.

**Project Construction**

As previously mentioned, the nearest potential hazardous site is associated with Millbrae BART/Caltrain Station (No. 60002244), located approximately 0.3-mile west of the project site at 200 Millbrae Avenue.<sup>38</sup> The cleanup status is active as of August 2015, and lead from a former ceramics manufacturing facility may be present in on-site soils.

Construction of the billboard foundation is expected to generate excess soils and groundwater that may require special handling. Based on the deepest foundation design scenario (approximately 77 feet), approximately 58 loose cubic yards of soil may be generated, and approximately 25 gallons of static groundwater may be displaced.

- Soil: TPH-d and TPH-mo were detected at concentrations of 7.58 milligrams per kilogram (mg/Kg) and 7.83 mg/Kg, respectively. Chromium and lead were detected at concentrations of 76.0 mg/Kg and 23.8 mg/Kg, respectively. The concentrations of TPH-d, TPH-mo, chromium, and lead detected in the soil sample are below the Regional Water Quality Control Board (RWQCB) Environmental Screening Levels (ESLs) for Direct Exposure Human Health Risk Levels for residential, commercial/industrial, and construction worker scenarios. According to the Summary of Soil and Groundwater Sampling Activities, the presence of TPH-d, TPH-mo, chromium, and lead in soil does not appear to trigger a Hazardous Material Release Reporting requirement per California Code of Regulations, Title 19, Division 2, Article 2, sections 2630-

<sup>38</sup> EnviroStor. 2022. Millbrae BART (60002244). Website: [https://www.envirostor.dtsc.ca.gov/public/profile\\_report?global\\_id=60002244](https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60002244). Accessed February 16, 2022.

2632. As such, the soils would be classified as non-hazardous waste. However, the potential for project construction to create a significant hazard with respect to soil removal is less than significant. Nevertheless, MM HAZ-1 requires exhumed soils to be placed into roll-off bins for additional sampling prior to disposal, unless a licensed receiving facility accepts the soil without further testing.

- Groundwater: TPH-d and TPH-mo were detected at concentrations of 253 micrograms per liter (µg/L) and 315 µg/L, respectively. The concentration of TPH-d in groundwater exceeds the California drinking water Maximum Contaminant Level (MCL) for TPH-d (200 µg/L). However, shallow groundwater from the site is not the source of drinking water and there are no applicable groundwater ESLs for construction workers and the detected TPH concentrations are not listed wastes. Therefore, the potential for project construction to create a significant hazard with respect to displacement of groundwater is less than significant. The contractor performing dewatering activities would utilize 10,000-gallon trucks to contain any extracted water volumes for disposal at an off-site location in accordance with appropriate regulations depending on water quality, as set forth in MM HAZ-1.

Therefore, any potential for project construction to create a significant hazard with respect to soils or groundwater would be rendered less than significant with the implementation of MM HAZ-1.

### **Project Operation**

Operation of the proposed project, which entails the changing of messages on electronic billboard faces and sporadic maintenance by a *de minimis* number of workers and trucks, would not involve the use of any hazardous materials with the potential to significantly impact the public. Therefore, impacts from operation of the signs would be less than significant.

#### **c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**No impact.** There are no schools within one-quarter mile of the project sites. The distance to the nearest schools are as follows:

- Mills High School is approximately 0.6-mile south of the project site.
- Spring Valley Elementary School is approximately 0.9-mile south of the project site.
- Taylor Middle School is approximately 1.1 miles southwest of the project site.

Therefore, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within 0.25-mile of an existing or proposed school. No impact would occur.

#### **d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

**Less than significant impact.** The proposed new OADS site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, the site is near a

listed hazardous materials site, as described previously in Impacts 2.8(a) and 8(b). The impact would be less than significant.

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

**Less than significant impact.** The project site is approximately 0.1-mile south of SFO. The Comprehensive Airport Land Use Compatibility Plan (ALUCP) for the Environs of San Francisco International Airport,<sup>39</sup> adopted in 2012, is the ALUCP for SFO. The proposed project is within the SFO Airport Influence Area and falls within Safety Compatibility Zone 2 of the ALUCP.<sup>40</sup> Zone 2 is an area of secondary accident risk that tends to be overflown by most aircraft arrivals and departures off each runway end. The proposed project would comply with applicable policies contained in the ALUCP such as Policy AP-4, Other Flight Hazards are Incompatible. Policy AP-4 requires proof of consistency with FAA rules and regulations and with any performance standards to be provided to the Airport Land Use Commission. Furthermore, as discussed under Impact 2.1(c), the FAA's aeronautical study indicated that the proposed billboard exceeds obstruction standards and would potentially have an adverse physical or electromagnetic interference effect and could be a hazard to air navigation. However, the FAA determined that if the structure were reduced in height so as not to exceed 47 feet, it would not create a substantial adverse effect. Thus, because the height of the billboard is proposed to be 45 feet, the FAA shall issue an immediate Determination of No Hazard to Air Navigation. As a result, the proposed project would result in less than significant impacts.

- f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less than significant impact.** The proposed project would not interfere with any adopted emergency response plan or emergency evacuation plan, including the Multi-Jurisdictional Local Hazard Mitigation Plan (LMHP) for the San Francisco Bay Area. The LMHP does not identify evacuation routes. Although project plans are currently unknown, it is not anticipated that any surrounding roadways would be closed for the brief construction period; however, the Central County Fire Department (CCFD), who currently provide contract fire and emergency medical services to the City of Millbrae, would review the project plans to ensure continued access in the project vicinity. Because of the nature of the proposed project, once operational, the new billboard would not have impacts related to emergency evacuation or conflict with an emergency evacuation plan. Impacts would be less than significant.

- g) **Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

**No impact.** The proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires because there are no wildlands on

<sup>39</sup> Ricondo & Associates et. al. 2012. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport. Website: [https://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated\\_CCAG\\_ALUCP\\_November-20121.pdf](https://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf). Accessed February 23, 2022.

<sup>40</sup> Ibid.

or surrounding the project area. The area has an extensive history of development, including residential and commercial buildings with minimal landscaping. There would be no impact.

## Mitigation Measures

**MM HAZ-1** The soil excavated from the site shall be placed in roll-off bins and additional sampling shall be conducted (at a rate of one composite sample per 250 cubic yards) to develop a waste profile for special handling and disposal, unless a licensed receiving facility accepts the soil without further testing. Prior to disposal, additional sampling of groundwater extracted during dewatering activities shall be completed to develop a waste profile for special handling and disposal. If contamination in excess of regulatory levels is detected, soil materials and groundwater shall be disposed of in accordance with State regulations for hazardous waste.

Soil and other hazardous materials removed from the site shall be characterized and disposed of according to San Mateo County waste disposal guidelines. Contaminated soil and groundwater that exceeds regulatory thresholds shall be handled by trained personnel using appropriate protective equipment and engineering and dust controls, in accordance with local, State, and federal laws. If soil or groundwater to be removed from the site is found to be contaminated, it shall be hauled off-site and disposed of at a licensed hazardous materials disposal site.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.10 Hydrology and Water Quality</b> <i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

### Setting

The project site is located in an urban area that is primarily covered with impervious surfaces in the form of buildings and paved roadways. The existing local stormwater network collects precipitation and drainage in the project area.

The nearest body of water is the San Francisco Bay, located approximately 0.2-mile east of the project site. No surface bodies of water traverse the project site.

Would the project:

- a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

**Less than significant impact.** Ground disturbance involved with the proposed project would consist of excavation of a new foundation for the OADS. The project area is fully paved. Once the foundation has been excavated for the proposed billboard, the pole or other support structure would be installed and cemented into place. Excavated soils would be hauled to a landfill and no exposed soils would remain on-site. As such, a limited amount of soil would be exposed during the brief construction period associated with excavation activities. Construction of the proposed project would result in less than significant impacts related to water quality standards.

Once constructed, the proposed project would not affect water quality or result in a violation of waste discharge requirements. Proper operation and maintenance of the billboard would continue to ensure that such structures do not contribute pollutants to stormwater runoff. Impacts would be less than significant.

- b) **Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

**Less than significant impact.** The proposed project would not utilize groundwater sources, and there would be no need to drill wells to supply water for the proposed project. In terms of impervious surface, the proposed new OADS would not add impervious surface to the project vicinity because the site is currently paved. However, it is possible that, for this site, the groundwater table could be encountered during excavation at 40 to 60 feet for an anticipated 77-foot boring for the sign structure foundation and would require dewatering. Because of the small size of the site, it is anticipated that dewatering would be necessary for only a single day while the applicant's contractor drills into the sites and installs the foundation. Given the very short duration in which dewatering would take place, it is not expected this activity would substantially deplete groundwater supplies or interfere substantially with groundwater recharge.

Furthermore, operation of the proposed project is unlikely to affect groundwater supplies or interfere with groundwater recharge or groundwater management. The advertising of goods and services on the proposed OADS does not affect the volume, movement, or recharge of groundwater. As such, impacts would be less than significant.

- c) **Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

- (i) **result in substantial erosion or siltation on- or off-site;**

**Less than significant impact.** The proposed project's billboard installation site is currently paved. Construction of the OADS's foundation structure would result in a small footprint that would not result in substantial erosion or siltation compared to existing conditions. No ground disturbance

would occur during operational activities associated with the new billboard. Impacts would be less than significant.

- (ii) **substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**

**Less than significant impact.** The proposed project's billboard installation site is currently paved. Construction of the proposed billboard's foundation structure would result in a small footprint that would not substantially impact the amount of runoff from the site or increase impervious surfaces compared to existing conditions. The proposed project would not substantially contribute to runoff water that would exceed the capacity of existing drainage systems or provide sources of polluted runoff. Impacts would be less than significant.

- (iii) **create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;**  
**or**

**Less than significant impact.** As discussed in Impact 2.10(c)(iii), the proposed project would not exceed the capacity of existing or planned drainage systems or provide sources of polluted runoff. Impacts would be less than significant.

- (iv) **impede or redirect flood flows?**

**Less than significant impact.** The Federal Emergency Management Agency (FEMA) flood maps identify areas that are prone to flooding. According to FEMA Flood Insurance Rate Map (FIRM), 06081C0132F,<sup>41</sup> the project site is designated as Flood Zone AE—areas subject to inundation by the 1 percent annual-chance flood. However, the project site is flat and surrounded by existing developments and roadways. Given that the site is already developed with impervious surface, the proposed project would also not substantially increase the rate of surface runoff in a manner that would result in flooding on- or off-site or impede or redirect flood flows. As such, impacts would be less than significant.

- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

**Less than significant impact.** The FEMA flood maps identify areas that are prone to flooding. According to FEMA FIRM 06081C0132F,<sup>42</sup> the project site is designated as Flood Zone AE—areas subject to inundation by the 1 percent annual-chance flood. In April 2020 the Millbrae City Council prepared the Sea Level Rise Adaptation Assessment (Assessment). The Assessment was a major step in expanding the understanding of sea level rise risks to the City, communicate these risks to the community, and plan for sea level rise by identifying potential mitigations, adaptation, and hazard mitigation strategies. Several resources provided foundation for the Assessment including the FEMA Flood Insurance Study for understanding of risk of flooding from Sea Level Rise and San Francisco

<sup>41</sup> Federal Emergency Management Agency (FEMA). 2021. FEMA Flood Map Service Center. Website: <https://msc.fema.gov/portal/search?AddressQuery=400%20east%20millbrae%20ave%2C%20millbrae%2C%20ca#searchresultsanch> or. Accessed February 25, 2022.

<sup>42</sup> Ibid.

Estuary Institute's (SFEI) Bay Shoreline Adaptation Atlas (Adaptation Atlas)<sup>43</sup> which identified a set of Operational Landscape Units to define the regional planning boundary and recommended adaptation measures. The Assessment provided recommendations to plan, fund, design, and construct measures and move forward with local and regional stakeholder engagement. The intent of the Assessment is to provide tangible and achievable local and regional solutions to the threat of sea level rise through a series of mitigation strategies. Potential mitigations provided as a result of the Assessment fall into two main categories: (1) shoreline protections that depend on regional collaboration and (2) local protections that can be prioritized and executed by the City. The Assessment is the first step to identify opportunities to integrate recommended actions into existing or future City plans to fund and construct the necessary infrastructure to protect the City.<sup>44</sup>

Although the project site is located within a flood hazard zone, the proposed project would comply with the Millbrae Municipal Code regulations relevant to water quality. As such, impacts would be less than significant. Additionally, no housing on the project site is proposed, which precludes the possibility of structures being placed within a flood hazard area.

A seiche is a seismically or wind-induced wave on an enclosed body of water such as a lake or reservoir. There are no lakes or reservoirs in the vicinity, so there would be no seiche hazard. The project site is located approximately 0.2-mile west of the San Francisco Bay, where tsunami inundation is unlikely. The site is located in a relatively flat area, so mudflows are unlikely to occur. No impact related to seiches or tsunamis would occur.

**e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**No impact.** The installation of the proposed new OADS would result in minimal ground disturbance. The footprint of the support structures would be minimal (one column measuring 5 feet in diameter) and would not lead to a substantial amount of new impervious surfaces. In addition, the OADS would not use any materials or equipment that could lead to surface water pollution. Therefore, the proposed project would not conflict with or obstruct implementation of a water the quality control plan or sustainable groundwater management plan and no impact would occur.

## Mitigation Measures

No mitigation measures are required.

<sup>43</sup> San Francisco Estuary Institute. Bay Shoreline Adaptation Atlas. 2019

<sup>44</sup> City of Millbrae Sea Level Rise Adaption Assessment. Website:  
<https://www.ci.millbrae.ca.us/home/showpublisheddocument/23203/637300819844270000>. Accessed April 25, 2022.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.11 Land Use and Planning</b> <i>Would the project:</i>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

### Setting

The project site is within an established urban area with a history of industrial and commercial development. The project site is approximately 50 feet east of the US-101.

As described in the Section 1.3.1, Land Use Designation and Zoning, the General Plan identifies the project site as part of the MSASP. The MSASP zones the project site as PF which is applied to portions of the MSASP plan area that are reserved for utility-related uses or public services, including City storage yards, parking, and potentially stormwater treatment facilities or bioretention swales.<sup>45</sup> Further, the General Plan Land Use Map<sup>46</sup> designates the areas surrounding the project site as Industrial and Utility, General Commercial, and Park and Open Space. The City of Millbrae's Official Zoning Map<sup>47</sup> zones the areas surrounding the project site as Planned Development, Industrial, and Open Space.

Would the project:

#### a) Physically divide an established community?

**No impact.** The physical division of an established community typically refers to the construction of a physical feature, such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road or bridge that would impair mobility within an existing community or between a community and outlying area. The proposed OADS would be bounded by US-101 and installed on property owned by the City which is developed with the City's WPCP. Therefore, the project site is in an established urban area. The construction of the OADS would not result in the division of an established community. Thus, no impact would occur.

<sup>45</sup> City of Millbrae. 2021. Millbrae Station Area Specific Plan. October 26.

<sup>46</sup> City of Millbrae. 1998. City of Millbrae General Plan – Map 3-4 Land Use Plan. November 24.

<sup>47</sup> City of Millbrae. 2009. City of Millbrae Official Zoning Map. October 13.

**b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

**Less than significant impact.** The City of Millbrae Municipal Code Sign Regulations contained in Chapter 10.10 would allow the proposed project under Chapter 10.10.250, Freestanding Signs. As noted in the Project Description, the proposed billboard would have an advertising surface area of two digital LED panels that would total 1,344 square feet and the billboard structure would be 45 feet in height. Therefore, the proposed project would not meet Chapter 10.10.250's requirements to not exceed 20 feet above the nearest existing curb grade and would exceed 120 square feet in area for surface area for the sign faces. However, the proposed billboard would be permitted with the approval of a CUP to allow for the height and surface area increase. Based on these parameters, the proposed project would conform to all other requirements of the Chapter 10.10, Sign Regulations, and local regulations.

As described in Section 2.9, Hazards and Hazardous Materials, the proposed project is within the SFO Airport Influence Area and falls within Safety Compatibility Zone 2 of the ALUCP.<sup>48</sup> Therefore, the proposed project would be required to comply with applicable policies contained in the ALUCP such as Policy AP-4, Other Flight Hazards are Incompatible. Policy AP-4 requires proof of consistency with FAA rules and regulations and with any performance standards to be provided to the Airport Land Use Commission. Furthermore, as discussed under Impact 2.1(c), the FAA's aeronautical study indicated that the proposed billboard exceeds obstruction standards and would potentially have an adverse physical or electromagnetic interference effect and could be a hazard to air navigation. However, the FAA determined that if the structure were reduced in height so as not to exceed 47 feet, it would not create a substantial adverse effect. Thus, because the height of the billboard is proposed to be 45 feet, the FAA shall issue an immediate Determination of No Hazard to Air Navigation.<sup>49</sup> As such, the proposed project would not conflict with the SFO ALUCP and impacts would be less than significant.

In addition, the proposed project would be subject to the Caltrans Outdoor Advertising Act, Section 5403(g) of the Business and Professions Code, and OAAA regulations and standards, which govern the illumination and brightness of electronic message billboards. The project's compatibility with these regulations and standards is discussed further in the Project Description and in Impact 2.1(d) of this Draft IS/MND. Therefore, impacts regarding conflict with an existing land use plan, policy, or regulation adopted for the purpose of avoiding or would be less than significant.

## Mitigation Measures

None required.

<sup>48</sup> Ricondo & Associates et. al. 2012. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport. Website: [https://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated\\_CCAG\\_ALUCP\\_November-20121.pdf](https://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf). Accessed February 23, 2022.

<sup>49</sup> Ibid.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.12 Mineral Resources</b> <i>Would the project:</i>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

### Setting

The project area, including the proposed billboard site, does not support mineral extraction activities and no known mineral deposits exist in the project area.

Would the project:

- a) **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?**

**No impact.** The project area does not support mineral extraction activities and no known mineral deposits exist in the project area. Therefore, implementation of the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. There would be no impact.

- b) **Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

**No impact.** The project area does not support any mineral extraction activities, and no known mineral deposits exist in the project area. Therefore, implementation of the proposed project would not result in the loss of availability of a locally important mineral recovery site delineated in a local general plan, specific plan, or other land use plan. There would be no impact.

## Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.13 Noise</b> <i>Would the project result in:</i>				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

### Setting

The project area contains major highways and other roadways. The consistent use of these roadways by vehicles results in steady ambient noise levels. The proposed new OADS site is located at 400 East Millbrae, just east of US-101 in San Mateo County. The billboard would operate 24 hours per day, seven days per week and would not emit noise or audio. A hotel located 800 feet east of the project site would be the closest receptor of construction noise.

### Characteristics of Noise

Noise is defined as unwanted sound. Sound levels are usually measured and expressed in decibels (dB), with 0 dB corresponding roughly to the threshold of hearing. Most of the sounds that we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Noise is typically generated by transportation, specific land uses, and ongoing human activity.

The standard unit of measurement of the loudness of sound is the dB. The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3 dB or less are only perceptible in laboratory environments. A change of 3 dB is the lowest change that can be perceptible to the human ear in outdoor environments. While a change of 5 dBA is considered the minimum readily perceptible change to the human ear in outdoor environments.

Since the human ear is not equally sensitive to sound at all frequencies, the A-weighted decibel scale (dBA) was derived to relate noise to the sensitivity of humans, it gives greater weight to the

frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for a number of various sound level metrics, including the day/night sound level ( $L_{dn}$ ) and the Community Noise Equivalent Level (CNEL), both of which represent how humans are more sensitive to sound at night. In addition, the equivalent continuous sound level ( $L_{eq}$ ) is the average sound energy of time-varying noise over a sample period and  $L_{max}$  is the maximum instantaneous noise level occurring over a sample period.

Would the project result in:

- a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

**Less than significant impact.**

**Short-Term Construction Noise Impacts.** For purposes of this analysis, a significant impact would occur if construction activities would result in generation of a substantial temporary increase in ambient noise levels in excess of established standards, such as any substantial increase that could result in nighttime annoyance or sleep disturbance of nearby sensitive receptors. Section 9.10.050 of the Millbrae Municipal Code<sup>50</sup> limits the hours of noise generating construction activity to the hours of 7:30 a.m. to 7:00 p.m. Monday through Friday, 8:00 a.m. to 6:00 p.m. Saturdays and 9:00 a.m. to 6:00 p.m. on Sundays and Holidays. Any deviation from these permissible hours must be approved by the Building Official.

Construction of the billboard would take approximately 5 to 7 days to complete and involves the use of hand tools, small crane rigs and water trucks. Construction of the proposed new OADS's foundation would be a vibrated installation method.

The maximum noise level generated by a vibratory pile driver is 95 dBA  $L_{max}$  at 50 feet from this equipment. The closest noise-sensitive receptor to the project site construction footprint is the hotel land use located south of the project site. The closest façade of the hotel would be located over 800 feet from the construction footprint. At this distance, construction noise levels could range up to approximately 70 dBA  $L_{max}$ . These noise levels would occur temporarily during the expected one day installation of the proposed footing for the project.

Although there could be a relatively high single event noise exposure potential causing an intermittent noise nuisance, the effect of construction activities on longer-term (hourly or daily) ambient noise levels would be small but could in annoyance or sleep disturbance of nearby sensitive receptors, unless these activities are restricted to daytime hours. However, compliance with the City's mandatory permissible hours of construction would ensure that construction noise would not occur during evening or nighttime hours during this expected one day vibratory installation process. Therefore, project reasonable worst-case project construction noise levels would not result in a substantial temporary increase in ambient noise levels in excess of established standards, and would

<sup>50</sup> City of Millbrae, 2021. Millbrae Municipal Code. November. Website: <https://www.codepublishing.com/CA/Millbrae/>. Accessed on: March 11, 2022.

not result in a substantial temporary increase in ambient noise levels that would result in annoyance or sleep disturbance of nearby sensitive receptors. Therefore, temporary construction noise impacts would be less than significant.

**Long-Term Operational Noise Impacts.** The proposed new OADS is not designed to emit any sound, and the proposed project would not generate regular vehicle trips. Therefore, the proposed project would not generate a substantial permanent increase in ambient noise levels in the vicinity of the project. No impact would occur.

**b) Generation of excessive groundborne vibration or groundborne noise levels?**

**Less than Significant Impact.** A significant impact would occur if the proposed project would generate groundborne vibration or groundborne noise levels in excess of established standards. The City has not established a standard for excessive groundborne vibration levels resulting from construction activities. However, the Federal Transit Administration (FTA) has established industry-accepted standards for vibration impact criteria and impact assessment in its Transit Noise and Vibration Impact Assessment Manual.<sup>51</sup> The FTA guidelines include thresholds for construction vibration impacts for various structural categories.

In extreme cases, excessive groundborne vibration has the potential to cause structural damage to buildings. Common sources of groundborne vibration include construction activities such as blasting, pile driving, and operating heavy earthmoving equipment. Construction vibration impacts on building structures are generally assessed in terms of peak particle velocity (PPV). For purposes of this analysis, project-related impacts are expressed in terms of PPV.

**Short-term Construction Vibration Impacts.** The foundation used for the proposed structure would be a vibrated installation method. The column foundation would be five feet in diameter and would extend to a depth of 77 feet below the ground surface. Of the variety of equipment that would be used during construction, the vibratory pile drivers would produce the greatest groundborne vibration levels. Vibratory pile drivers typically produce groundborne vibration levels ranging up to 0.17 inch per second (in/sec) PPV at 25 feet from the operating equipment.<sup>52</sup>

The nearest off-site receptors to the project construction footprint where the sonic pile driving equipment would operate is a pump and equipment housing structure located northwest of the project footprint. The façade of this structure would be located approximately 40 feet from the nearest point where the sonic pile driving equipment would operate. At this distance, groundborne vibration levels from operation of the sonic pile driver would attenuate to less than 0.08 in/sec PPV. This is below the FTA's Construction Vibration Impact Criteria of 0.5 in/sec PPV for this type of structure: a building of reinforced concrete and masonry construction. Therefore, impacts resulting from construction-related groundborne vibration levels would be less than significant.

**Operational Vibration Impacts.** Implementation of the proposed project would not result in any permanent sources that would expose persons in the project vicinity to groundborne vibration levels

<sup>51</sup> Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September.

<sup>52</sup> Ibid.

that could be perceptible without instruments at any existing sensitive land use in the project vicinity. In addition, there are no existing significant permanent sources of groundborne vibration in the project vicinity to which the proposed project would be exposed. Therefore, operational groundborne vibration impacts would be considered less than significant.

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

**No impact.** A significant impact would occur if the proposed project would expose people residing or working in the project area to excessive noise levels for a project located in the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport.

The closest airport to the proposed new OADS site is the SFO, located approximately 700 feet north of the site. This billboard would be located within the SFO 65 dBA CNEL noise contours. In addition, construction of this new digital sign would not introduce any new sensitive receptor to the existing environment and would therefore not expose persons residing or working in the project site to excessive noise levels associated with private airstrip or public airport noise. No impact would occur.

## Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.14 Population and Housing</b> <i>Would the project:</i>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

### Setting

According to the California Department of Finance (CDF), the City of Millbrae's estimated population as of January 2021 was approximately 22,509.<sup>53</sup>

The nearest single-family residences are located approximately 900 feet west of the project site, across US-101.

Would the project:

- a) **Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

**No impact.** The proposed project would install one OADS on a project parcel currently used as a public facility supporting the City's WPCP. It does not propose new homes or businesses, roadways or infrastructure expansion, or any other growth-inducing elements. Therefore, the proposed project would not induce unplanned population growth directly or indirectly. There would be no impact.

- b) **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

**No impact.** The proposed project would not displace any existing housing or people. There are no residential units located on the project site. Therefore, no construction of replacement housing is necessary. There would be no impact.

<sup>53</sup> California Department of Finance (CDF). 2021. E-1 Cities, Counties, and the State Population Estimates with Annual Percent Change – January 1, 2020, and 2021. Website: <https://www.dof.ca.gov/forecasting/demographics/Estimates/E-1/>. Accessed February 24, 2022.

## **Mitigation Measures**

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.15 Public Services</b> <i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i>				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

### Setting

Fire protection and emergency medical services for the City of Millbrae are contractually provided by the CCFD and law enforcement services are provided by the San Mateo County Sheriff's Office. The project area is served by Millbrae Elementary School District and San Mateo Union High School District. The nearest park facilities to the project site include Bayfront Park and Bayside Manor Park.

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

#### a) Fire protection?

**Less than significant impact.** CCFD Fire Station No. 37 is the closest station to the project site, located approximately 0.77-mile northwest of the site. The proposed OADS would be constructed in conformance with current codes and regulations that would reduce potential fire hazards. Although the proposed project may increase the need for fire protection service at the project site, CCFD could adequately serve and provide fire protection services as the nearest station is approximately four minutes away. As a result, impacts would be considered less than significant.

#### b) Police protection?

**Less than significant impact.** The San Mateo County Sheriff's Office Millbrae Police Bureau is located approximately 0.76-mile northeast of the project site. The proposed project would not result in an increase in population, and therefore would not increase demand for police services. Although the

construction of the proposed billboard could create a target for graffiti, the San Mateo County Sheriff's Office Millbrae Police Bureau would adequately serve the project site. In addition, because the proposed billboard is located on private property owned by the City with security gates and video cameras, the probability of vandalism occurring would be low. As a result, impacts would be considered less than significant.

**c) Schools?**

**No impact.** The project area is served by Millbrae School District and San Mateo Union High School District. Because of the nature of the proposed project, there would not be an increase in population in the project area and therefore, would not result in an increased demand for school facilities. As such, no impact would occur.

**d) Parks?**

**No impact.** Implementation of the proposed project would not result in an increase in population or in demand for existing parks and recreational facilities. The closest recreational facilities to the proposed project is Bayfront Park, located approximately 0.1-mile northeast of the site, and Bayside Manor Park located approximately 0.14-mile west of the site. Because of the nature of the proposed project, there would be no need for the construction of new parks and recreational facilities. There would be no impact.

**e) Other public facilities?**

**No impact.** The implementation of the proposed project would not result in an increase in population and therefore, would not result in an increased demand for other public facilities. Therefore, there would be no need for the construction of new public facilities. There would be no impact.

## Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.16 Recreation</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

### Setting

The closest recreational facilities to the proposed project is Bayfront Park, located approximately 0.1-mile northeast of the site, and Bayside Manor Park located approximately 0.14-mile west of the site.

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

**No impact.** The proposed project would not result in an increase in residents that could increase the demand for and use of nearby parks or recreational facilities. Therefore, the proposed project would not result in any physical deterioration of recreational facilities. There would be no impact.

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

**No impact.** The proposed project does not propose recreational facilities, and it would not result in an increase in residents that could increase the demand for and use of nearby parks or recreational facilities. Therefore, construction or expansion of recreational facilities would not be required. There would be no impact.

## Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.17 Transportation</b> <i>Would the project:</i>				
a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

### Setting

The project site is triangular in shape and is bounded by US-101 to the west, Millbrae Avenue to the south, South McDonnell Road to the north, and a surface level parking lot to the east. The proposed OADS would be located approximately 10 feet east of US-101, abutting the Caltrans right-of-way.

Would the project:

- a) **Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**

**No impact.** Construction-related traffic, including truck and construction worker trips, would be minimal and would not substantially affect traffic conditions during the short duration of project construction required for the construction of the OADS. The crane used for the construction of the OADS and other construction activities would be staged on the respective project site and would not occur within public right-of-way, nor require street closures. Because the OADSs do not require manual change of images like static billboards require, it is anticipated these maintenance trips would be less frequent and of shorter duration than the trips necessary to service a traditional billboard. These trips would occur only as needed (less than once per month and likely only one vehicle). Therefore, the proposed project would not increase traffic congestion on the surrounding roadways or freeways or affect level of service standards at nearby intersections and would not conflict with a program plan, ordinance, or policy addressing the circulation system. Thus, no impact would occur.

**b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

**No impact.** According to CEQA Guidelines Section 15064.3, subdivision (b)(1), Vehicle Miles Traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within 0.5 mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be considered to have a less than significant transportation impact. Because of the nature of the proposed project, there would not be any change in the traffic distribution over existing conditions. CEQA Guidelines Section 15064.3 subdivision (b)(2) focuses on impacts that result from certain transportation projects. The proposed project is not a transportation project. Therefore, no impact would occur.

CEQA Guidelines Section 15064.3 subdivision (b)(3) and (b)(4) focuses on the evaluation of a project's VMT. The only vehicle trips that would be generated would be those during the construction of the new OADS. This would involve negligible traffic, generated largely during off peak-hours. In terms of project operation, periodic maintenance would be required at the project site, which would also generate negligible traffic. As a result, the proposed project would not result in a conflict or be inconsistent with Section 15064.3 subdivision (b) of the CEQA Guidelines and no impact would occur.

**c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**Less than significant impact.** The proposed project involves the construction of one new OADS. Therefore, the proposed project would not require the alteration or construction of roadways and no impact would occur related to sharp curves or dangerous intersections. The proposed OADS would be required to adhere to Caltrans Outdoor Advertising Act requirements and OAAA recommendations that govern illumination so as not to interfere with drivers' visibility. These requirements are designed to reduce hazards from OADSs to the drivers on the surrounding roadways at the project site, thus, the impacts would be less than significant.

**d) Result in inadequate emergency access?**

**No impact.** The proposed project involves the construction of one new OADS that would not interfere with emergency access nor would it block or impede emergency access at the project site. The crane used for the construction of the proposed project would be staged on the respective project site parcel, not within the freeway right-of-way, and construction would not occur within public right-of-way. Once operational, due to the nature of the proposed project, the OADS would not have impacts related to emergency access. Therefore, no impact would occur.

## Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.18 Utilities and Service Systems</b> <i>Would the project:</i>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

### Setting

The City of Millbrae obtains its municipal water supply from the San Francisco Public Utilities Commission (SFPUC). The City's Public Works Department operates the WPCP, which treats wastewater generated within the City. The proposed OADS would be located on property occupied by the City's WPCP.

The City's solid waste is processed at a transfer station at Oyster Point in the City of South San Francisco and then is transported to the Corinda Los Trancos Landfill (also known as Ox Mountain Sanitary Landfill) in the City of Half Moon Bay.

Would the project:

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**No impact.** The proposed OADS would use electrical power service that is currently provided to the site by PG&E. The proposed OADS would be installed underground near the billboard installation site pursuant to current electrical codes, including Title 24 of the State Building Code. These standards would ensure that electrical energy would be used efficiently. Operation of the proposed project would not generate any solid waste or wastewater, nor would the project require a supply of potable water. All waste materials associated with the conversion of the billboard would be recycled or deposited in landfills in compliance with State and local laws. No new or expanded electrical, natural gas, or telecommunications facilities would be required as a result of the proposed project. Therefore, there would be no impact.

- b) **Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?**

**No impact.** The proposed project would not generate demand for water. Construction and operation of the proposed project would not result in existing water systems exceeding capacity during normal, dry, or multiple dry years, or require the construction of new facilities or expansion of existing facilities. Therefore, there would be no impact.

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

**No impact.** The proposed project would not generate demand for wastewater services because it is not a structure or a site that is used by people. No connection to the City's sewer system is required. Therefore, it would not require the construction of new wastewater treatment facilities or expansion of existing facilities. There would be no impact.

- d) **Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

**Less than significant impact.** The construction of the proposed OADS may generate a small amount of construction debris. A construction deposit is required by the City to ensure compliance with recycling and waste disposal regulations. Any construction debris that is not recyclable would be transported to the Ox Mountain Sanitary Landfill by the applicant. According to the California Department of Resources Recycling and Recovery (CalRecycle), the Ox Mountain Sanitary Landfill has a permitted capacity of 60.5 million cubic yards and has a remaining capacity of 22.2 million cubic yards.<sup>54</sup> Because there is sufficient capacity at the Ox Mountain Sanitary Landfill to receive minimal solid waste materials from the proposed project, impacts would be considered less than significant.

<sup>54</sup> California Department of Resources Recycling and Recovery (CalRecycle). 2021. SWIS Facility/Site Inspection Details – Corinda Los Trancos Landfill (Ox Mountain). Website: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/3223>. Accessed February 25, 2022.

e) **Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?**

**Less than significant impact.** Solid waste disposal resulting from construction would follow the requirements of the City, which must adhere to federal, State, and local statutes and regulations related to the collection of solid waste. No waste would result from operation of the proposed sign. The proposed project would comply with all State and local waste diversion requirements. Therefore, the proposed project would have a less than significant impact.

### Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.19 Wildfire</b> <i>If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, would the project:</i>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Environmental Evaluation

### Setting

According to the California Department of Forestry and Fire Protection's (CAL FIRE) Fire Hazard Severity Zone Maps for San Mateo County, the City of Millbrae is located within a Local Responsibility Area (LRA) and is not classified as a Very High Fire Hazard Severity Zone.<sup>55</sup> The City is not located within a State Responsibility Area (SRA). The nearest fire hazard zones are located in the City of Hillsborough, approximately 3 miles southwest of the project site.

Would the project:

#### a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

**Less than significant impact.** The proposed project would not interfere with any adopted emergency response plan or emergency evacuation plan, including the 2016 San Mateo County Multi-Jurisdictional Hazard Mitigation Plan (HMP) Annex for the City of Millbrae.<sup>56</sup> The MFD would also

<sup>55</sup> California Department of Forestry and Fire Protection (CAL FIRE). 2008. Very High Fire Hazard Severity Zones in LRA – San Mateo County. Website: [https://osfm.fire.ca.gov/media/6800/fhszl\\_map41.pdf](https://osfm.fire.ca.gov/media/6800/fhszl_map41.pdf). Accessed February 25, 2022.

<sup>56</sup> San Mateo County. 2016. San Mateo County Hazard Mitigation Plan – Chapter 12 City of Millbrae. Website: <https://www.ci.millbrae.ca.us/home/showpublisheddocument/11516/636329609141070000>. Accessed February 25, 2022.

review the project plans to ensure there is appropriate fire access for the project area. As such, impacts would be less than significant.

- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

**No impact.** The project area is not located within an area prone to wildfires. The project site is located on a flat surface area with no steep hills or slopes. No native vegetation occurs on the project site and only one singular tree exists near the proposed billboard's installation site. In addition, the proposed OADS would not change the nature of the project site. As a result, there would be no impact.

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

**No impact.** The project area is not located within an area prone to wildfires. In addition, the proposed project would not change the nature of the proposed OADS site, and would not require the installation or maintenance of associated infrastructure. As a result, there would be no impact.

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

**No impact.** Operation of the proposed OADS would not generate any known risk of wildfire. Furthermore, no residential uses are proposed. The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire instability or drainage changes. Therefore, no impact would occur.

## Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<b>2.20 Mandatory Findings of Significance</b>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Environmental Evaluation

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

**Less than significant impact with mitigation incorporated.** As described in Section 2.4, Biological Resources, the proposed project would not result in significant environmental impacts to wildlife or plant species. There are no known special-status species on the billboard construction or removal sites, though this analysis provides for mitigation in the event any nests are encountered. In addition, the proposed project would not adversely affect geology/soils or hydrology/water quality in any significant matter. The proposed project includes mitigation and avoidance measures to reduce construction-related impacts related to archaeological and paleontological resources. Therefore, with implementation of MM BIO-1, MM CUL-1, and MM CUL-2, the proposed project would not substantially degrade the quality of the environment at a project- or cumulative-level in terms of biological resources, geology and soils, hydrology and water quality, or cultural resources.

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

**Less than significant impact with mitigation incorporated.** The combined effects of past, current, and future projects in the project area in combination with the proposed project—installation of a new electronic billboard on US-101 in the City of Millbrae—would not result in significant cumulative impacts.

Operation of the proposed project would involve the display of messages on one electronic billboard (two sign faces) along US-101. Operation of the sign would entail no noise production, minimal maintenance traffic, and no emissions. The proposed project’s lighting would have the potential to cumulate with other reasonably foreseeable projects, but the proposed project’s lighting specifications (limiting operation to a maximum of 0.3 foot-candle at 250 feet) takes account of existing ambient lighting. Moreover, the brightness of the LED sign faces would be dimmable to reflect ambient light conditions. Separately, there are no reasonably foreseeable development projects in the immediate project vicinity that would have lighting impacts that could cumulate with the proposed project’s lighting. With respect to electricity usage, the LED lighting used in the proposed billboard would meet Title 24 requirements for energy efficiency. While the signs electricity usage is associated with off-site emissions where power is generated, the Draft IS/MNDs analysis of GHG emissions demonstrates the proposed project falls well below applicable BAAQMD thresholds, which account for cumulative impacts of climate change. Therefore, the proposed project, because of its size and utilization of energy-efficient lighting, would not make a cumulatively considerable contribution to cumulative GHG emissions or result in an overall impact to local and regional levels of GHG emissions.

With respect to construction, the construction activities necessary to construct the proposed billboard is *de minimis*, requiring very little equipment and occurring within a timeframe of 5 days. However, as detailed in this Draft IS/MND, equipment related to construction would result in dust, noise, risks related to the handling of hazardous materials, and potential impacts to cultural resources. Accordingly, the proposed project includes BAAQMD-recommended mitigation and avoidance measures to reduce temporary, construction-related impacts related to air quality; noise mitigation measures to reduce noise impacts to less than significant; protocols for handling hazardous materials to reduce risks to insignificant levels; and measures designed to ensure impacts to cultural resources are less than significant. These measures ensure not only that the proposed project, individually, would not have a significant impact, but that it would not make a considerable contribution to any cumulative impact. Meanwhile, the proposed project does not contemplate activities within close proximity of any reasonably foreseeable construction projects (i.e., at least 1,000 feet), and so the potential for cumulative impacts to occur is low to non-existent. Therefore, with implementation of the foregoing mitigation measures, the proposed project would not result in adverse impacts at a project- or cumulative-level in terms of air quality or GHG emissions.

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

**Less than significant impact with mitigation incorporated.** The proposed project would be consistent with the City's goals set forth in the Municipal Code guiding construction of new billboards. The proposed project would include mitigation measures to minimize light and glare and traffic hazards for vehicle drivers along US-101.

The proposed project also would not make sizable contributions to traffic or noise or substantially change land uses. In addition, the proposed project would not affect public services, utilities, recreation, mineral resources, agriculture/forestry resources, or population/housing balance. With implementation of the mitigation measure discussed in Section 2.8, Hazards and Hazardous Materials, the proposed project would also not expose human beings to significant risks related to hazards/hazardous materials.

Consequently, with implementation of MM HAZ-1, the proposed project would not cause cumulative-level direct or indirect substantial adverse effects on human beings in terms of aesthetics/light-glare, traffic/traffic safety, noise, land use, public services, utilities, recreation, mineral resources, agriculture/forestry resources, population/housing, or hazards/hazardous materials.

### Mitigation Measures

See MM AES-1, MM AES-2, MM AIR-1, MM BIO-1, MM CUL-1, MM CUL-2, and MM HAZ-1.

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