



*Loma Prieta Chapter serving San Mateo, Santa Clara & San Benito Counties*

October 16, 2014

Chair and Members of the Millbrae City Council &  
Mr. Marty Van Duyn – Community Development Project Manager  
C/O City Clerk  
City of Millbrae  
621 Magnolia Avenue  
Millbrae, CA. 94030

**Re: Millbrae Station Area Specific Plan (MSASP) & Draft EIR**

Dear Chair and Members of the City Council & Mr. Van Duyn:

Thank you for providing the opportunity for the Sierra Club Loma Prieta Chapter Sustainable Land Use Committee to comment on the proposed MSASP. As an environmental organization working towards reducing local greenhouse gas emissions, we encourage the development of higher density, mixed-use development near major transit stations.

Although the MSASP is still in the conceptual development stage, we believe the general direction of the MSASP looks to have many features that make it an appealing Plan.

1. Mixed use development
2. Pedestrian priority areas
3. Designated bicycle routes

Once the draft MSASP is released to the public, the Sierra Club's Sustainable Land Use Committee will evaluate it using our *Guidelines for Downtown and Station Area Plans* <http://lomaprieta.sierraclub.org/sustain/guidelines> to decide whether it will qualify for Sierra Club endorsement. Meanwhile we have some concerns that we ask you to consider in both the specific plan and the upcoming DEIR.

**1. Approval of Urban Republic and Serra Properties proposals** - We understand the approval process for these two developments will be done in parallel with approval of the MSASP. We are concerned that the specifics of each of these proposals may unduly influence the final elements of the MSASP and urge you to consider the MSASP separate from these two proposals. For example, there are elements of the 1998 Plan that these two proposals do not include which we feel should be considered such as a pedestrian bridge crossing over El Camino Real and a pedestrian / bike undercrossing beneath E. Millbrae Avenue.

**2. El Camino Real & East Millbrae Avenue**

The vital pedestrian access routes needed to make this plan work are very problematic.

- a. El Camino Real is currently three lanes each way - a very busy street which is a major impediment to pedestrians trying to cross from the multi-modal center to properties west of El Camino. The evolving MSASP shows enhanced at-grade street crossings at Victoria Avenue, Millbrae Avenue, and Murchinson Drive, but no direct crossing from the multi-modal station to the west side of El Camino Real. This requires pedestrians and bicyclists to take a circuitous route to cross El Camino. The 1998 Specific Plan included a potential pedestrian bridge overcrossing of El Camino in alignment with a new pedestrian plaza between the Caltrain station and El Camino. Such a bridge would solve the pedestrian crossing problem and should be seriously considered in

the MSASP. An alternative, is to reduce El Camino to two traffic lanes each way rather than three and to add a center island, bulb outs, landscaping, and other amenities to slow traffic and improve pedestrian safety at enhanced on-grade street crossings in support of the vision put forth in the Grand Boulevard Initiative.

- b. East Millbrae Avenue is a major physical and visual impediment to integrating the Plan areas north and south of E. Millbrae Avenue. The current Plan relies on Rollins Road to connect the two sides, but that will require a safe and inviting auto / pedestrian / bike crossing at the intersection of Rollins Road and E. Millbrae Avenue which, given Rollins Road's close proximity to the 101 off ramp, will be difficult to do. The 1998 Specific Plan addressed this problem by including a direct 'subway' pedestrian / bicycle crossing under E. Millbrae Avenue to facilitate pedestrian and bike access to properties south of E. Millbrae Avenue. The current Republic Urban proposal does not include such a link. A direct, attractive and safe pedestrian-priority connection between properties north and south of E. Millbrae Avenue should be included in the MSASP.
- c. Improving the safety and convenience of street crossing on these two thoroughfares, could go a long way toward helping the city improve the Walk Score for the project area. <http://www.walkscore.com/>.

### **3. Promote walking, biking, and transit-use as projects are developed within the MSASP**

- a. Assure pedestrian safety: Pedestrian convenience should be the primary design criteria. Sidewalks and street crossings should be designed to assure public safety.
- b. Walks: Provide walkways that are wide and protected from traffic by landscaped strips or parked cars. They should be attractive to encourage walking, and include street trees where practical. Street crossings should include curb bulb-outs to shorten the time pedestrians are in the cross walk.
- c. Public plazas: Provide conveniently located and attractive pedestrian-oriented public plazas as stand-alone features and/or combined open space with nearby projects.
- d. Connectivity: Provide direct connections to the city's existing public sidewalks and urban trail system and provide a major pedestrian connection to the west side of El Camino Real and the South side of E. Millbrae Avenue.
- e. Safe Routes to School: Design new pedestrian plazas and walkways to meet "Safe Routes to School" criteria.
- f. Block size: Break up large building blocks with pedestrian alleés, pass through lobby, or pathway every 50' in order to make walking the most convenient, fastest, and pleasurable mode of transportation to get around.
- g. Traffic speed: Limit traffic speed in pedestrian-priority areas to 15 mph maximum. Studies show that pedestrian vs. auto fatalities are greatly reduced at this speed.
- h. Improve bus stops: Encourage bus use by working with the city and SamTrans to provide benches or seats in rain-protected shelters at conveniently located bus stop(s) and install nighttime illumination of the bus stop(s).
- i. Issue Free Transit Passes: Provide every tenant (residential and commercial) with free transit passes for the first five years or more of tenancy to encourage transit use. This requirement is being implemented in many cities as part of Climate Action Plans in order to meet state law mandates for Air Quality goals.
- j. Implement relevant portions of the City's Bicycle Master Plan as it relates to the MSASP.
- k. Bike Parking: Provide one free gender-secure bike parking spot per unit and 10% or more bikes per car parking ratio for public and guest parking.

- l. Way-finding: Provide way-finding signage with directions to nearby bike routes.
- m. Bike share: Provide bike share on-site or within 3 blocks of the development.
- n. Shuttles and car share: Provide public or employee shuttle stops and car-share parking on-site or on adjacent streets to help commuters make the “last mile” connection to their place of work or home.
- o. Mobility Management: Support a mobility management program to increase demand for alternative transportation by providing convenient and cost saving technology such as apps for peer-to-peer car share and smart cards for easy transit access and payments.

**4. Housing Density and Affordable Housing** - The amount of affordable housing, if any, is undefined and the total number of potential housing units in the MSASP is also undefined. The MSASP should include 40 units per acre or more of housing including at least 15% affordable units to house enough residents to support the local retail stores and to increase transit ridership.

**5. Reduce Parking** - Given that structured parking spaces generally cost \$30,000 - \$40,000 or more per space to build and that this site is a transit-oriented site, the number of parking spaces per unit should be reduced to one car per unit or less and the money saved on constructing parking used to build additional housing units and to support related community benefits such as child care and green space.

Please refer to the Sierra Club’s White Paper: *Recommendations for Housing Affordability, Reduced Parking Cost and Congestion* for further strategies for reducing parking costs <http://lomaprieta.sierraclub.org/sustain/guidelines> (bottom of page).

- a. Reduce parking ratio: The MSASP is a great opportunity to do a truly Transit-Oriented Development, not an auto-oriented development. This means that parking ratios should be severely reduced from that of non-transit-oriented developments. A recent study conducted by San Jose State University (SJSU) and Santa Clara Valley Transportation Authority (VTA) found that parking usage rates at 12 transit-oriented developments near VTA light rail and Caltrain stations were significantly “over parked”<sup>1</sup>. Over parking is bad for the development as it increases cost. It is also bad for the City’s Climate Action Plan that counts on TOD to reduce greenhouse gases due to traffic. By improving the Walk Score as suggested in 2c, Millbrae could further reduce the need to drive. A more appropriate parking ratio for a TOD is one car per unit or less.
- b. Provide shared parking: The developers should offer shared parking where commuters and retail customers can use on-site parking during the day and residential tenants can use the parking at night. This would reduce the overall number of parking spaces required and reduce project cost.
- c. Fund enforcement of Millbrae's Residential Permit Parking program: Currently we understand that the program is unenforced in surrounding neighborhoods. Enforcement would make parking changes in the station area feasible and acceptable.
- d. Provide unbundled parking: Unbundled parking in residential dwellings (i.e. the cost to park a car is separate from unit rent) can make units more affordable for those who do not drive and prefer not to own a car. This provides a real incentive for residents to consider alternative modes of transportation by reflecting the true cost of parking. People often self select to live near transit because they prefer to use alternative modes of transportation and the MSASP should include features that attract these non-drivers (often young professionals, empty nesters, and senior citizens).
- e. Parking permits: Opposition to unbundled and reduced parking may come from nearby residential and commercial neighbors where free parking is provided. They may be concerned that residents in the MSASP will choose to park on neighboring streets rather than pay to park in their own development. One strategy to

overcome this resistance is to establish residential permit parking in residential areas adjacent to new development which limits the time that unpermitted parking is allowed. Installing parking meters in commercial districts is also effective.

- f. Pay parking in-lieu fee: Contribute a in-lieu fee to build nearby public satellite parking to serve the development. If public satellite parking is located off-site, but close by, it can reduce the number of cars that need to be parked on-site and allow some on-site areas that would have been dedicated to parking to be used to increase retail or housing units, thus increasing overall project rental and tax income.
- g. Congestion pricing: Owners of the development or the city to establish a congestion pricing program in and adjacent to the MSASP to help even out parking demand at different times of the day.

<sup>1</sup> The 2010 collaborative research with San José State University (SJSU) and VTA titled “A Parking Utilization Survey of Transit-Oriented Development Residential Properties in Santa Clara County” found that parking usage rates at 12 transit-oriented developments (TOD) near VTA light rail and Caltrain stations were significantly over parked. The peak parking utilization surveys were conducted mid-week between 12:00 midnight and 4:00 a.m., and all 12 TOD residential sites offered more parking supply than parking demand (actual use). Nearly 26 percent of parking spaces for the 12 survey sites were not utilized (2,496 unused). SJSU and VTA estimated the 2,496 unused parking spaces for the 12 TOD sites would represent approximately \$37.4 million in opportunity cost.

## **6. Provide Community Benefits**

- a. Community Benefit Agreement: Enter into a community benefit agreement with the city that outlines the development’s contributions to the community. Community benefits may include living wages, local hiring and training programs, affordable housing, day care facilities, a community meeting room, public parks and plazas, and environmental remediation, as well as funds for community programs such as shuttles, beautification, and neighborhood improvements.
- b. Development fees: Contribute a donation or pay development fees for community benefits such as maintenance and upgrade of on-site and off-site public parks and trails, restoration of existing natural features, and on-site agriculture or community gardens.

**7. Bus convenience** - The Plan does not currently include a designated bus stop on El Camino Real for access to the multi-modal station. The current circuitous route used by SamTrans to service the station is very inefficient and time consuming. A clearly defined bus stop on El Camino Real (opposite the proposed pedestrian plaza leading to the multi-modal station as visualized in the 1998 Plan) should be included in the MSASP.

**8. Lucky / Walgreens Site** - We are curious why the Lucky / Walgreens site on Murchinson Drive was not included in the MSASP. It is only slightly beyond the 800’ walk circle, but easily within ¼ mile of the multi-modal station. Surely, this site should be included in a 20 year plan which could see either Lucky or Walgreens move out of the area.

**9. Sea Level Rise** What impact will future seal level rise have on development in the MSASP? If significant impact is probable, what strategies to prevent flooding and storm damage are built into the Plan?

## **10. Environment, Energy, and Resource Efficiency:**

- a. Air quality: Assure development meets regional air quality goals including the requirements of BAAQMD’s latest Clean Air Plan and Regional Transportation Plan for the Bay Area.
- b. Building and site construction:
  - 1) Meet minimum LEED Silver or 75 points Green Point Rating.
  - 2) Include Net Zero Energy design for renewable energy and to meet Climate Action Plan goals (e.g. solar panels, and energy efficient fixtures).
  - 3) Incorporate bird-friendly design to reduce bird deaths from collisions with buildings.
  - 4) Include sustainable landscaping and/or roof top gardens.
  - 5) Include Class 2 electric car charging stations for at least 10% of parking spaces.

- 6) Deconstruct 70% minimum existing parking lots and structures so materials can be reused or recycled to reduce landfill.
- 7) Use FSC certified wood for at least 75% of wood used to build the development.
- 8) Provide a grey water reuse program.
- 9) Install on-site sewage treatment facility.
- 10) Incorporate Low Impact Development such a pervious paving and vegetated swales to benefit water supply and contribute to water quality protection.

#### **11. Summary of our Concerns:**

- a. Develop the MSASP with an independent eye so that the Urban Republic Proposal and the Serra Properties proposal do not unduly influence the Plan.
- b. Plan for safe pedestrian crossings at both El Camino Real and E. Millbrae Avenue.
- c. Pedestrian priority , convenience, and safety should be the primary design criteria for developments within the MSASP.
- d. Include at least 40 units or more per acre density and 15% affordable housing in the Plan. Affordable units are especially important along the Grand Boulevard corridor, and are a consideration for MTC funding for road and transit improvements in the PDA corridor.
- e. Reduce parking.
- f. Provide community benefits.
- g. Provide a safe and inviting bus stop on El Camino Real for direct access to the proposed plaza leading to the multi-modal station, and include additional bus stop(s) elsewhere in the MSASP as needed.
- h. Include the Lucky / Walgreens site in the MSASP.
- i. Establish design criteria to support environmental energy and resource efficiency.

Thank you for considering our comments for this station area plan. We look forward to reviewing the draft MSASP when it is issued.

Respectively Submitted,

Sustainable Land Use Committee  
Sierra Club Loma Prieta Chapter