



SIERRA CLUB

LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

January 6, 2022

To: Nestor Guevara, Associate Planner
City of Millbrae Planning Division
621 Magnolia Avenue
Millbrae, CA 94030
nguevara@ci.millbrae.ca.us

Dear Mr. Guevara,

Thank you for taking comments on the Notice of Preparation for the Millbrae General Plan 2040 update.

Here are five items to consider in putting the plan together:

- 1- Explain how the plan will achieve the state's VMT targets.
- 2- Explain how the plan will improve the health of the transit district.
- 3- How can the goals of the Grand Boulevard be achieved?
- 4- How will air and water pollution be reduced in line with state goals?
- 5- How will the city be safer to walk and bike?

1- The plan should explain how Millbrae will meet the [The California Air Resources Board determination](#) that local governments must achieve Vehicle Miles Travelled reductions of 7 percent below projected VMT levels in 2030 (which includes currently adopted SB 375 SCSs).

The feasible alternative would be for the general plan to promote significant reductions in VMT via designs that prioritize pedestrian movement in the half mile around the train center, add dense housing that is car-free but include car, bike, and scooter share, and building a lot more Single Room Occupancy and other affordable units.

On page 101 CARB says

“It is recommended that local governments consider policies to reduce VMT to help achieve these reductions, including land use and community design that reduces VMT, transit oriented development, street design policies that prioritize

transit, biking, and walking, and increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities. It is important that VMT reducing strategies are implemented early because more time is necessary to achieve the full climate, health, social, equity, and economic benefits from these strategies.”

On page 76 CARB says

“Promote all feasible policies to reduce VMT, including:

- Land use and community design that reduce VMT,
- Transit oriented development,
- Complete Street design policies that prioritize transit, biking, and walking, and, increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities.”

2- The plan should explain how the General Plan will contribute to the improvement of SamTrans.

The feasible alternative would be to put in more affordable housing, look at density to include climate refugees, provide every new household resident with SamTrans and Caltrain passes; include congestion pricing parking within the corridor, while providing first and last mile options through [shared micro mobility](#). The circulation element should include priced parking on ECR and in the 1/2 mile surrounding neighborhood with a residential permit parking pass for existing residents.

On page 81 CARB says pathways to implement the state level VMT reduction should include strategies such as:

"Developing pricing mechanisms such as road user/VMT-based pricing, congestion pricing, and parking pricing strategies."

On Page ES6

- Integrate land use, transit, and affordable housing to curb auto trips;

On page ES6

- Provide energy-efficient affordable housing near job centers and transit;

On page ES10

- Promote vibrant communities and landscapes through better planning efforts to curb vehicle-miles-traveled and increase walking, biking and transit;

On page 76

- Complete street design policies that prioritize transit, biking, and walking, and
- increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities.

3- Millbrae as a participant in the Grand Boulevard should explain how the future of El Camino Real will function as pedestrian environment within a dense transit corridor.

The feasible alternative would be to enhance pedestrian priority in the 1/2 mile radius around the BART station.

On page ES1 CARB says

- Improve the health of all Californians by reducing air and water pollution and making it easier to bike and walk;

4- Millbrae should explain how the General Plan by 2040 will increase renewable power and reduce toxic emission around the transit center like BART especially air pollution impacting lower income residents, and water pollution from runoff.

The feasible alternative would be to ask for all electric passive construction to eliminate methane and its burned effluent pollution indoors, eliminate air pollution from the lifetime emissions from the project through walking and biking priority, and meet the energy waste and water needs on site via microgrids for a resilient strategy to meet the recommendation of IPCC6 for staying within 1.5 degrees of warming by 2030.

On page ES4 CARB provides this chart of pathways to meeting 2030 goals and Paris.

CALIFORNIA'S CLIMATE POLICY PORTFOLIO



Double building efficiency



Cleaner freight and goods movement



50% renewable power



Slash potent "super-pollutants" from dairies, landfills and refrigerants



More clean, renewable fuels



Cap emissions from transportation, industry, natural gas, and electricity



Cleaner zero or near-zero emission cars, trucks, and buses



Invest in communities to reduce emissions



Walkable/Bikeable communities with transit

On page 97 CARB says

- CARB will continue to actively implement the provisions of AB 617, AB 197, AB 1071, SB 535, AB 1550, and other laws to better ensure that environmental justice communities see additional benefits from our clean air and climate policies.

And on page 64 CARB says on water and waste

- Land conservation results in healthier watersheds by reducing polluted runoff, allowing groundwater recharge, and maintaining properly functioning ecosystems.
- Resilient natural and working lands provide habitat for species and functions to store water, recharge groundwater, naturally purify water, and moderate flooding. Forests are also a source of compost and other soil amendments.
- Conservation and land protections help reduce VMT and increase stable carbon pools in soils and above-ground biomass
- Compost for carbon sequestration, erosion control in fire-ravaged lands, water conservation, and healthy soils

- Replacing virgin materials with recycled materials associated with goods production; enhanced producer responsibility reduces energy impacts of consumption
- Efficient packaging materials reduces energy consumption and transportation fuel use

5- Millbrae should explain how dangers to pedestrians and bicyclists can be reduced such that the mode share increases to offset greenhouse gases from transportation.

How will the goals of the Millbrae Downtown Specific Plan overcome past problems with multi mobility goals?

NACTO covers the pro and cons of separated bikeways- https://nacto.org/wp-content/uploads/2016/05/2-4_FHWA-Separated-Bike-Lane-Guide-ch-5_2014.pdf

During the pandemic a better feasible alternative for increasing mode share was Oakland's Slow Streets

<https://nacto.org/publication/streets-for-pandemic-response-recovery/emerging-street-strategies/slow-streets/>

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- increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities.

Thank you for your attention to our suggestions,



Gladwyn d'Souza
 Conservation Committee Chair
 Loma Prieta Chapter Sierra Club