[Note that comments have been attributed to individuals in this draft for sake of review and discussion at the public OSEC meeting. They, and any other notes in red text, will be removed in the final submission document.]

The Open Space and Ecology Committee very much appreciates the extra time allotted to review the Guadalupe Quarry Draft Environmental Impact Report and submits the following comments:

Chapter/Section: ES - Executive Summary

General Comments:

[Anthony Walker] It is stated quite clearly throughout the executive summary and elsewhere that the project will be unable to achieve its fair share in State of California's 2045 carbon neutrality goals. Throughout the document major emissions sources are cited as "significant and unavoidable". I find this facially unacceptable so long as other avenues to meaningfully reduce, eliminate or otherwise offset or compensate the City and community are not implemented.

The transition off fossil fuels will be difficult for many sectors and won't happen all at once. That doesn't mean all commercial activity can or should stop, and I certainly have no intent of obstructing any project as a matter of course; but we also cannot accept this level of emissions as business as usual anymore. If the city were to allow this development to go forward as is presented in this EIR, it would be turning a blind eye to those emissions and essentially abandoning our climate goals as empty words without actual consequences.

For developments like this to go forward I think we need to create pathways for effective offsets and perhaps new financial vehicles that would enable businesses and developers to contribute their fair share to other local projects and GHG mitigation / elimination efforts that directly benefit the community and help make us whole again. I would like to discuss potential options further with the Committee.

[Mary Rogers]

- There are 8 "Significant Unavoidable" call outs within this draft. This is unacceptable. There is no work arounds proposed. Why would we agree to a project containing these outcomes?
- Brisbane is ~3.1 square miles which equates to approximately 1984 acres. Of these acres, ~ 1000 are livable. The proposed Quarry project is ~146 acres. So, the total increase in development for the Quarry project is ~15%. This project is not conducive to the community of Brisbane for several reasons.
    - Traffic congestion – just imagine standing on Valley Drive while at least 100 large container trucks rush up and down each morning and late afternoon. Please visualize the heavy traffic on the 2 lane Bayshore Blvd and what might happen if there's an accident
    - Noise Pollution - Please imagine the noise level these trucks will have affect on noise pollution, especially for our neighbors on the ridge
    - Emergencies - Please imagine the high risk of emergency vehicles not being able to get to the neighbors on the ridge due to the increased traffic

[Michele Salmon]

- The Executive Summary seems incomplete and does not adequately characterize the Project. For example, where is the PG&E Plan Review that was requested by PG&E for approval? What hours of operation were used for all for the subsequent data? How timely is the data presented? What is the exact amendment(s) needed to comply with the San Bruno Mountain Habitat Conservation Plan? Where is the agreement that the County will accept the "donated" land and the liabilities associated with it? The ES is ambiguous and seems incomplete.
- Table ES-2 lists many things as "Not applicable" that are very applicable – for example, "An existing community would become physically separated from one or more other communities." Children, in particular, walking to school from the Northeast Ridge to Lipman Intermediate and central Brisbane, as well as other pedestrians, would have to cross through both the dramatically increased incoming and outbound truck and employee traffic.

Specific Comments:

- Section ES 7.2 Estimates for the mining operations and specifically the "No Project Alternative" dramatically contradicts the published 2006 estimates.
- Section ES 7.1 Alternative 3: Combined Warehouse/Data Center does not reference or include a PG&E Plan Review as requested by PG&E representative Alexa Boyd to Kelly Beggs via email dated January 6, 2023.
- No mention is made of sewage processing.
- Table ES-2 mentions Impact Threshold HAZ-2 as "Less than significant" even though the Project sphere of influence (traffic and emissions) is within .25 miles of a school.
- Table ES-2 – Hydrology and Water Quality with designations of "Less than significant" and "Not applicable" are mostly untrue as stormwater goes directly to the Lagoon and to SF Bay.
- Table ES-2 Biological Resources – There are so many things wrong with this whole section. "If the translocated individuals (referring to special-status plants) do not survive, the applicant shall dedicate migration lands containing a comparable population of special-status plants to compensate for the loss of the translocated populations." Where, exactly, are they going to find these mythical mitigation lands with comparable populations of special-status plants? The hubris and misguidance that you can substitute one special-status plant for another is beyond belief and is offensive.
- Table ES-2 Biological Resources – "Tree removal…shall be conducted during seasonal periods of bat activity…when juvenile bats would be able to fly and feed independently etc. etc." Where, exactly, are the bats supposed to fly to and feed on since all the trees they roost and hibernate in will be gone, as they will have been completely removed? What are they now supposed to feed on?

Chapter/Section: Chapter 1 - Introduction

[Michele Salmon]

- I, as Michele Salmon, a citizen of Brisbane, submitted 25 comments for the first round of the NOP in July of 2023. In Section 1.3, it states that "This EIR considered the public scoping comment received…" and yet when I asked for specific references because I was having difficulties finding the answers to the valid questions that I submitted, I was told that I should submit them again as comment on the review of the Draft EIR. [This may need to be removed or restated since it is not from OSEC but from an individual perspective.]

- There is no mention of the use of drones or operating vertiports. Vertiports should be categorically banned from this Project.

Chapter/Section: Chapter 2 – Project Description

General Comments:

[Erin Becker, with concurrence by Jason Nunan] There are many statements in the DEIR with promises, but no designated authority or responsibility. We have concerns that these will be forgotten in the long term. Examples follow:

- [Section 2.8.4, Page 2-26] – The DEIR states that the Rockfall Protection Fence will be "periodically inspected and maintained." By whom: the landowner or the lessee or the City?

- [Section 2.9, Page 2-26] – The DEIR states that the 36 acres of conservation easement (in perpetuity) will be "managed by a qualified third-party entity." Who is this? Are they equipped to do invasive removal on 36 acres? Who pays for this in perpetuity?

[Michele Salmon] The Project Description is vague, somewhat ambiguous and unrealistic in their expectations.

Specific Comments:

[Erin Becker, with concurrence by Jason Nunan]

- [Section 2.4, page 2-5] – One of the City's objectives is to *"Provide a positive fiscal impact on the local economy through the creation of jobs, generation of tax revenue, and payment of other development fees that contribute to the City's ability to provide services."* The unfortunate consequence of this is the disqualification of non-industrial alternatives that honor the unique local environment, such as a botanical garden, nature center and/or wildlife preserve. While it's too late to revise the Objectives for this project, this is an important point to remember if we go through this again.

- [Section 2.6, Page 2-12] – Given the large number of freight trucks, trailers and delivery vehicles being added to the City's GHG emissions, if this redevelopment project is approved, we suggest that the City update the Reach Codes (or whatever the appropriate codes are) to restrict vehicle idling to <3 minutes. [Erin noted: this comment might go better in a different section — I didn't read the transportation or GHG sections]

- [Section 2.10.2, Page 2-27] – The DEIR introduces a *proposed* new zoning ordinance "TC-3" and further proposes five permitted uses that do not require a conditional use permit from the city (these five uses are Data Centers; Freight forwarding; Food production and distribution; Light fabrication manufacturing, assembling, processing; and Warehousing). This gives a loophole for the four uses that are not directly part of the current Quarry DEIR. For example, the power and water requirements of a Data Center should be studied by the City and given the opportunity for public comment separate from the existing DEIR. We recommend that TC-3 only include Freight Forwarding as a Permitted Use and all others be deemed Conditional at this point (along with the other conditional uses in the draft TC-3 in Appendix C). To further this argument, page 3.5-30 states that the City may not have enough potable water for the freight forwarding project in a dry year, so we shouldn't give unchecked approval for a Data Center.

[Jason Nunan]

- Section 2.8.5– Economic Characteristics:
    - There is a reference to Sales Tax which I believe would present a false hope to Brisbane insofar as generating funds to help offset the impact of this project. If the warehouse is merely transferring goods, it is likely there will be NO SALES and thus no revenue stream.
    - Is it possible for Brisbane to ask for a payroll tax to be levied to somehow generate funds based upon the amount of additional stress to our infrastructure?
- Section 2.9: Would the 46 acres transitioned to San Mateo County be guaranteed as Open Space or usable for any purpose?
- Section 2.10.2– Proposed City Zoning: Is the reference to Data Centers a 'back door' clause that would allow the facility to become a super high energy consuming center for cloud computing? Is this conditional or to become a permanent fixture?

[Michele Salmon]

- **Section 2.8.2 Hours of Operation** – "Warehouse operation **may** occur between 5:00 a.m. and 10:00 p.m. 7 days a week, **depending** on the final tenant." Not only is this ambiguous, it leaves the door open for 24/7 hours of operation. In addition, even if "warehouse" operation is limited to 5:00 a.m. to 10:00 p.m., it makes no mention of hours of operation for a data center, no mention of ingress and egress hours for employees, as well as pre-hours of trucks lining up (with possibly diesel idling) for pick-up.

- Were all of the noise and traffic impacts based on these mythical hours of operation? If so, they need to state that in every instance in the Project EIR. What exact hours are they basing all of their stats on?

- **Section 2.10 General Plan Amendment etc.** – The Project mentions that "open space land offered for dedication to San Mateo County would remain within unincorporated San Mateo County." There is no mention of what happens and who takes responsibility if SMCO refuses the open space land to be dedicated? Or if they put conditions on this? This area includes dangerous cliffs and areas subject to rockfall, etc. What entity will be the responsible party? This project should not be allowed to move forward without a codicil that SMCO will accept the dedicated lands and the condition of said lands to be dedicated. Callippe Hill, which was to have been dedicated to SMCO Open Space when

the occupancy on the completed Northeast Ridge development was certified. After more than a decade, this land has still NOT been accepted by the County.

- **Section 2.11.2 San Bruno Mountain Area HCP Amendment** – Exactly what specific amendments to the SBMA HCP are needing for this project? Nowhere in this DEIR can I find listed the exact specifics of what needs to be amended to allow this project to move forward. The public should have complete transparency and the document should publish exactly what amendments were requested for this project whether they are or will be approved or not.

Chapter 3, Section 3.0 - Format of Environmental Analysis

[Erin Becker] The DEIR says that the "baseline" to compare all development impacts against is the existing quarry condition (page 3-1). All mining projects are required by SMARA to have reclamation plans and a bond to offset the costs of reclamation. We believe the "baseline" should have been the SMARA-required reclaimed condition.

Chapter 3.1: Land Use and Planning [Jason Nunan]

General Comments:

- Overall comment would be that provided all the mitigation measures are closely adhered to and monitored by the City that the impact would in fact be less than significant.

Specific Comments:

- Table 3.1.3: The 46 acres being dedicated to San Mateo County – will these be designated as Open Space or could be used for any purpose? Is this detailed anywhere in the agreement?
- Table 3.1-4: How many parking spaces are proposed for use accessing the trailheads? If less than 8 this would pose a problem particularly for City sponsored weeding programs, etc.
- Table 3.1.127: Good planning that no invasive species would be considered for planting. Request that project submit proposed plant species to OSEC for their review.
- Table 3.1.180: It will be critically important that the City is able to review and approve the truck routes as this will likely be the most disruptive single aspect of this project.
- Table 3.1.189 Night work should be entirely prohibited. Brisbane's current schedule for construction and is extremely accommodating. There should be no need to disturb residents with construction at night which would likely be motivated only by cost savings or adherence to a project deadline.
- Revegetation: As stated above we would kindly request that OSEC be consulted about revegetation and management of the conserved parcels.

Chapter 3.2: Mineral Resources [Erin Becker] – no comments

Chapter 3.3: Geology, Soils, and Seismicity [Erin Becker]

[Section 3.3.3, page 3.3-20 through 3.3-22] - We disagree with the determination of "less than significant" impact for GEO-4. This is for three reasons. (1) The existing area is already prone to landslide and rockfall hazards, for example page 3.3-20 mentions the two major landslides

within the existing quarry. (2) The second paragraph under the Slope Stability Hazards heading (page 3.3-20) states “Project activities that would increase the risk of slope failures and cause impacts of loss, injury, or death” due to the earthwork and pile driving planned during construction as described in that paragraph. (3) The third paragraph states *“The potential for slope movement above the quarry rim would be limited to shallow, localized debris flow failures of colluvial soil or highly weathered rock that could contribute to rock falls and additional debris on the quarry benches (Cornerstone 2023b) which could harm life or property and is considered a significant impact.”*

- The proposed mitigation measure is janky rockfall fence (as shown in Figure 2.7-1), however unlike other mitigations, this one is not captured in GEO-4. It should be because it is critical for safety.
- Further, on page 3.3-22, it is stated that the fence will undergo routine monitoring and maintenance, yet the DEIR does not say who has the responsibility for this: the Landowner, the Lessee or the City? In perpetuity?

Chapter 3.4: Hazards and Hazardous Materials [Erin Becker]

- [Section 3.4, page 3.4-3] The plan for the quarry redevelopment is to fill in the existing sediment ponds. Based on Becker’s previous experience working as an analytical chemist in the mining industry, hazardous materials will likely accumulate in the bottom of sediment ponds (both heavy metals and also organics that adhere to particulates). However, the ponds were not included in the environmental analysis. We recommend having samples from the existing ponds tested prior to filling them in, as this is a potential unknown source of groundwater contamination.
- [Section 3.4, page 3.4-18 and 3.4-22] In order to determine impacts, the DEIR “assumes” (per page 3.4-18) that the Project complies with all laws and regulations. Who will oversee this? We shouldn’t trust landowners, developers, or construction crews to protect our precious local environment. On page 3.4-22 it further states that the Applicant will hire an environmental professional, but this is a conflict of interest. Given the responsibility that this person has for monitoring and identifying contamination sources, which has the potential to slow down or halt construction, we believe that the City should oversee the environmental professional.
- [Section 3.4, page 3.4-21] There are two typos in the final sentence on this page. The first is a major error. The sentence starts with “The City would comply” but we think it should be the “The Project” that complies. The second typo is minor - it refers to section 3.4.2 which should be 3.4.3.
- [Section 3.4, page 3.4-24 through 25] We think the City should have more say in the Media Management Plan (not just the county), and public comment should be sought on the final version. The description of the MMP in the DEIR is anemic given the severity of the Hazards it is intended to mitigate (HAZ-1, HAZ-3, HYD-1). Further, the Operations and Maintenance section (page 3.4-25) failed to include the hazards associated with trucking, such as leaking oil, dust from the brakes and tires, and vehicle emissions (including when idling) and the fleet maintenance that is briefly mentioned in the next section (page 3.5-25).

Chapter 3.4 and 3.5 [Erin Becker]

[Section 3.4.4, Page 3.4-26 and Section 3.5.3, page 3.5-28 and page 3.5-34] Per the first paragraph under the Contamination heading (p 3.4-26), the plan is to put two large bioretention ponds exactly where the underground storage tanks have already contaminated the soil and groundwater. The new bioretention areas will have an impermeable liner, however DEIR is suspiciously optimistic that a plastic liner to work in perpetuity. Given that this is a mitigation for two significant hazards (HYD-1 and HYD-5), we would like to see some mention of who has responsibility for checking the pollutant level in and runoff from the bioretention ponds.

Chapter 3.5: Hydrology and Water Quality [Erin Becker]

[Section 3.5.3, page 3.5-18 though 19] The DEIR describes Groundwater Dewatering/Discharge effluent monitoring and compliance. Who will oversee this? We shouldn't trust landowners, developers, or construction crews to protect our precious local environment.

Chapter 3.6: Biological Resources [Michele Salmon]

General Comments:

Research is incomplete and inadequate. Much of it is not updated with current knowledge. There are errors and omissions in descriptions, plant/animal locations, and other gross inconsistencies. This points to the lack of clear understanding of the essential habitats involved and the requirements for survival of the species with special status.

Specific Comments:

Section 3.6 Biological Resources, page 3.6-34 Mission Blue Butterfly (*Icaria icarioides missionensis*) – One of the most egregious oversights or lack of knowledge is in the description of the Mission blue butterfly. There is absolutely no mention in the entire DEIR about myrmecophily in butterflies and the essential symbiotic relationship discovered between the Mission blue and the native ants. The developing larvae have a mutualistic relationship with native ants that defend the larvae from predation and parasitism in return for honeydew secreted by the larvae.

However, this mutualistic relationship with native ants may be disrupted by the presence of non-native Argentine ants resulting in increasing rates of predation and parasitism of larvae. Non-native Argentine ants, which will undoubtedly come with this development, will greatly threaten the survival of the Mission blue butterfly and other butterflies whose myremecophily relationships we do not yet know and/or understand.

In addition, the use of ant poison or other insecticides also pose a huge threat as use of these could wipe out the native ant population. Not knowing and/or not addressing of the much-publicized relationship between the Mission blue butterfly and the ants calls into question the credentials and knowledge base of the biologists that worked on the DEIR. How much other critical biological information has gone unremarked and is not adequately addressed?

Also, in discussing the Mission blue butterfly reproductive cycle, it is mentioned that eggs are usually laid singly on the dorsal side of new lupine leaves. It is not that simple. Please note that the Mission blue butterfly will nibble and taste a variety of lupine before deciding on which plant to ovoposit and many of these butterflies will choose the same plant because they find it to be

the “sweetest” one. The sweetest plant will produce the most honeydew to be secreted by the larvae to attract the ants. This complicated lifecycle was pointed out to me by my close friend, the late Dr. Larry Orsack, an international-noted entomologist, who did a lot of the early work on the Mission blue butterfly. Over the last 20+ years, I have observed this “tasting” ritual to be true. Since each plant tastes deferent to the butterfly, we do not know the impact of removing even a single plant from their habitat and it is complete hubris to think that we can recreate their habitat to meet their specific needs.

Chapter 3.7: Air Quality [Anthony Walker]

“TACs [Toxic Air Contaminants] are predominantly from DPM [Diesel Particulate Matter] accounting for roughly 85% of the cancer risk from air toxics in our region. Emissions of DPM and PM2.5 that are generated from the exhaust of diesel-powered engines are a complex mixture of soot, ash particulates, metallic abrasion particles, volatile organic compounds, and other components that can penetrate deeply into the lungs and contribute to a range of health problems. In 1998, the CARB identified DPM from diesel-powered engines as a Toxic Air Contaminant (TAC), based on its potential to cause cancer and other adverse health effects (CARB 1998).” 3.7-4

The largest source of emissions from this project would be diesel emissions from a combination of various construction equipment during the construction phase, heavy-duty warehouse trucks at 6,432 MT CO2e /yr (3.8-24, Table 3.8-6) and from emergency diesel generators. This is followed by gasoline passenger vehicle emissions at 1,142 MT CO2e /yr (3.8-24, Table 3.8-6).

The report characterizes these risks as “Less than significant with mitigation” but I think this may be underselling the problem. It seems fair to me to consider the increased risk as compared to Brisbane’s current local baseline emissions of 1176 MT CO2e /yr (3.8-24, Table 3.8-6) without consideration of offsets in comparison to regional averages etc. The bottom line is that local diesel emissions would be increasing by quite a lot – seemingly 6-8x what we are currently used to. Proximity of the site to Lipman Middle School and residences on The Ridge development seem to make it likely that we could expect to see incidences of related health issues increase more acutely in these areas, but potentially more broadly throughout Brisbane.

The document does say “As discussed in Section 3.8, Greenhouse Gas Emissions, the Project would include construction of electric vehicle (EV) charging infrastructure for passenger vehicles and medium and heavy-duty vehicles that meet the 2022 CALGreen Tier 2 requirements, supporting the transition to zero-emission vehicles.” This seems like a good start and a positive forward looking step for the overall goal of decarbonization, but would do little to alleviate the real-time emissions and resulting negative effects on air quality that would be felt by the community in the short term. I will touch more on EV charging infrastructure in my comments on Section 3-17: Energy, “Electric Trucks” and “Passenger Vehicles”.

Additionally, it does appear that part of the operations emissions noted are from emergency diesel generators which are a part of the main plan. This presumably also means onsite underground (?) diesel storage tanks as well which bring with them the potential for spills and other environmental hazards. Although it is unclear specifically how much back up capacity or what size tanks etc. are planned, I see this as a non-starter for the community in terms of both emissions and potential environmental harm. And it would also be a poor choice for the

developer in terms of ongoing operating costs, but I will go into more detail on this point in my comments on Section: 3.17 Energy – "Storage & Emergency Backup".

Chapter 3.8: Greenhouse Gas Emissions

[Anthony Walker]

Year one Emissions impacts:

Construction is expected to begin June 2025 and be completed by March 2028 (3.7-30). Viewing the estimated **construction emissions – 4157 MT CO2e** (3.8-23, Table 3.8-5) – amortized over a 30 year period seems like an effort to make that number look more palatable than it really is.

The truth is that by the time the facility comes online it will have already incurred all of these construction emissions up front – they will not be doled out in small chunks over 30 years – and they will be felt by the community in real-time. Combine that with the ongoing **net annual operations 7,355 MT CO2e** (3.8-23) and in the first year of operations alone the facility appears poised to handily wipe out nearly all previous emissions gains that the City of Brisbane has made as of the most recent 2021 Community GHG inventory.

Assuming we were able to maintain at least the same rate of GHG reductions we achieved in 2021 every year going forward, our 13.66% GHG reductions would be whittled down to less than half a percent in year one, and just less than 5% each year after that. If that's the best we can do, there goes the 2030 goal and probably 2040 as well…

Ongoing EN-1 Significant impact related to VMT:

Brisbane Annual Emissions	MT CO2e Reduced	MT CO2e Added	Total MT CO2e	Percent Reduced
2005 baseline			84,511	
2021	11,542		72,969	13.66%
Quarry construction + Year 1 operations (2025)	30	11,512	84,481	0.04%
Year 2+ Operations	4,187	7,355	80,324	4.95%

Estimated net annual total operations emissions are 7,355 MT CO2e. Of that amount 6,432 MT CO2e are attributable to "warehouse trucks" – which I assume means the same thing as heavy duty truck VMT emissions (3.8-24, Table 3.8-6). The argument is made that the location of the facilities in proximity to a major airport would reduce VMT 55% compared to regional averages, and projects an estimated annual trip offset of the same amount as emitted: 6,432 MT CO2e in avoided emissions. Table 3.8-6 pencils out Total Net Emissions at -2,614 MT CO2e, giving the characterization that: "…the Project would not result in a net increase in GHG emissions compared to the existing condition and this impact would be less than significant."

I beg to differ. Putting annual emissions into net negative territory by comparing it to an already poor regional average seems to me like an overly rosy assessment at best. I can definitely see that the location makes sense strategically and could be a real regional win that's well worth supporting in many ways. But make no mistake that although this might well be better than the

average, those emission have not gone away. They are still very real, and Brisbane would be bearing the brunt of their effects.

This framing here is a bit of fancy magical thinking in my opinion and not a reflection of the reality of the situation. I am in fact sympathetic to the economic arguments, but also very cognizant of the ongoing long term negative impacts of climate destabilization to economies worldwide if we get the next couple of decades wrong.

If a business like this wants to come into our community and pollute to this degree – effectively setting back most or all of our previous emissions reduction efforts – then giving them a pass for being better than an already pretty abysmal regional average as a baseline seems counterproductive. If this project is to go forward, I think there need to be concrete and enforceable plans articulated to fully phase out these emissions over a reasonable timeline, starting with the biggest offenders. And there should also mechanisms in place that enable the entity to compensate the city for their share of the problem for as long as the phase out period takes.

A note about the VMT metric:
The current framework BAAQMD uses in its transportation design element for reducing VMT does seem like a somewhat problematic framing to me in some ways. The overall vehicle miles traveled are not the actual problem – vehicle miles traveled in internal combustion engine vehicles are. The metric seems flawed as it doesn't effectively measure and therefore will not adequately reward proactive EV adoption. For example, if all 772 EV spaces proposed in this development were Level 2 chargers and the tenant were able to encourage a high enough usage rate, employee VMT might still be a bit higher than the regional average, but actual emissions could be considerably lower and therefore achieving or exceeding the desired effect. The more successful the transition to EVs, the more loosely correlated VMT and emissions will become until eventually it likely will be very difficult to draw a significant direct correlation at all.

[Barbara Ebel]

This project unfortunately is an egregious polluter, generating 150% of the already lax emissions targets. While it's roundly acknowledged that the transportation of goods is an important and growing sector, this project doesn't meet the VMT standards set forth by the state. It's stated that this is "unavoidable" and somewhat offset by reduced distances being traveled vs goods being trucked in from outside the bay area. I cannot for the life of my fathom how this logic plays out. If I buy a teddy bear manufactured in South Dakota, and it travels to me via Livermore, or it travels to me via Guadalupe Quarry, it is not significantly different. Goods still need to be delivered -TO- the Guadalupe Warehouse form their origin. Seems to me we are playing a shell games called 'Lets Externalize the Emissions.' Not amused.

Furthermore, all new commercial construction must be net zero starting in 2030, about the time this project is scheduled to be completed. Let's not bake in emissions we can't live with.

I'm sure the developer would like to skate in under the wire, but we as a species cannot keep approving projects that are not compatible with our survival. My advice to the council is that they reject the project and continue to reject the project until a version that is compliant with the state's and Brisbane's GHG reduction goals is submitted. Only low-income housing should be given a pass on GHG emissions.

“Appendix D of the 2022 [CARB] Scoping Plan includes recommendations for local governments to take actions that align with the state’s climate goals, with a focus on local climate action plans and local authority over new residential and mixed-use development. For project-level analysis, Appendix D of the 2022 Scoping Plan recommends key project attributes for residential and mixed-use projects to qualitatively determine consistency with the 2022 Scoping Plan, including transportation electrification, vehicle miles traveled (VMT) reduction, and building decarbonization.”

Chapter 3.9: Transportation and Circulation [Mary Rogers]

General Comments

- Future considerations of congestion along Tunnel Avenue, Bayshore Blvd. and Highway 101 should be considered and studied with all other major projects: i.e. Baylands and Candlestick
- Project construction is expected to last at least 30 months
- Frequent gridlock conditions to be expected; egress studies should be required
- Many safety concerns regarding congestion and Emergency Vehicle Access
- No guarantee that all public entities involved will sign up for the many infrastructure requirements – i.e Geneva overpass
- Many safety concerns for bicyclist, pedestrians along the Valley Drive corridor
- *The increase in trucks along Valley Drive corridor will increase the idling of trucks*
- *The increase in traffic on Bayshore Blvd will result in gridlock – Bayshore is a 2-lane boulevard that is currently facing high traffic activities without the Quarry Project.*

Specific Comments:

- Page 433 – Street Standards – Tunnel Avenue will likely be a conduit to Highway 101. Tunnel Avenue is not wide enough to accommodate the exponential increase in traffic. In addition, for bicyclist, there is no road shoulder for any potential safety areas.
- Page 436 – Parking – Policy C.41 – Maintain an appropriate amount of off-street parking in commercial areas – this is easier said than done. How will this be enforced?
- Page 423 – Bikeway facilities – Class IV – Separated Bikeway SHOULD BE THE ONLY CLASS CONSIDERED FOR THIS PROJECT – This Class IV offers more safety to bicyclists and pedestrians
- Page 432 – Goal 2: More People Riding and Walking for Transportation and Recreation – this is not guaranteed but stressing the importance of implementing Class IV Bikeways if the project moves forward
- Table 3.9.1 TDM Effectiveness Quantification – The total VMT reduction potential of 5.2% does not justify or help out the unbelievable increase in traffic congestion on both Valley Drive and Bayshore Blvd.

Chapter 3.10: Utilities and Service Systems [Mary Rogers]

General Comments:

- Has the City and County of SF agreed to the water requirements for this project?
- Have the SFPUC, SSF Scavenger Co, and other waste facilities agreed to the increase in Brisbane’s waste collection?

- Has PG&E and Peninsula Clean Energy agreed to the increase in electricity requirements? Will the site have Solar capabilities to be self- sustainable on electricity usage?

Specific Comments:

- Section 3.10-7 Has PG&E conducted an analysis of electrical requirements for the project? Can and has PG&E provided a usage analysis to be sure the data center/warehouse can be accommodated? Why not solar?
- Tables 3.10.3 – 3.10-5 – Water usage projections and requirements. Again, has City and County of SF agreed to provide necessary water usage? And, has an agreement with C&C SF to guarantee the water demand when faced with drought years?
- Significant and Unavoidable? Demanding that all necessary water requirements be understood and agreed upon prior to project start. This could be a disaster to the Brisbane Community**.**

Project Impacts and Mitigation Measures

Impact UTIL-1: The Project would result in a significant impact if the Project would 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.

Significance Determination: Significant and Unavoidable

- Table 3.10.8 Water shortfalls are concerning. The projected shortfalls should be mitigated prior to project start. And, again, stress the importance of the City and County of SF agreeing to the high-end water usage for this project.
- Page 500: **THIS IS SIGNIFICANT!**

Project Impacts and Mitigation Measures

Impact UTIL-1: The Project would result in a significant impact if the Project would 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.

Significance Determination: Significant and Unavoidable

- Page 500**: THIS IS SIGNIFICANT!**

Impact UTIL-4: The Project would result in a significant impact if the Project would 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; or the Project would not comply with federal, State, and local management and reduction statutes and regulations related to solid waste.

Significance Determination: Less than Significant

Chapter 3.11: Aesthetics and Visual Resources [Barbara Ebel]

Perhaps because this was the last section I read, I had a hard time finding meaningful content in it. It's filled with boiler plate and platitudes. It seemed to say don't worry, it's oversized, but it doesn't interfere with views much, the ridge lines, the mountain, the bay, and it will be exactly as ugly as every other industrial building. No argument that it will truly be a monstrosity. The largest omission is the failure to include a view from Ice House Hill, which everyone seems to forget about and will be looking right down onto the project. I don't really think there is much hope for making the project more visually palatable other than the inclusion of green walls, and the roof being dedicated to parking and solar.

Chapter 3.12: Cultural Resources and Tribal Cultural Resources [Michele Salmon]

General Comments:

- On the introductory page of this section, 3.12-21, under Built Historic Era Resource, *Guadalupe Quarry*, it talks about how the Guadalupe Quarry has been an integral component of the San Francisco Bay Area's transportation and infrastructure since 1895, and yet the conclusion is made that the Quarry is not a historical resource for the purposes of CEQA. I do not agree. The Quarry has been an important part of Brisbane's history and San Bruno Mountain's history and this is not explored at all. The Quarry itself
- There is no mention of the natural spring water that flows from the Quarry (no matter how many attempts to hide this and how much it is shunted underground) and the importance of natural spring water to the original native inhabitant to this area. This is an important cultural resource for the remaining native peoples, as well as for the people of Brisbane and those of us who grew up swimming in the crystal clear, icy waters of the Quarry.

Specific Comments:

- Section 3.12 Cultural Resources/page 3.12-21 Under "Tribal Cultural Resources," the Native American Heritage Commission (NAHC) recommended that seven individuals representing six Native American tribal groups be contacted regarding tribal cultural resources and the City sent these letter on April 5, 2022 to fulfill the requirements of AB 52 and SB18. To whom were these letters sent? Did it list include representatives from the Ramaytush Ohlone or any Ohlone-affiliated tribes? Any California tribes? Please provide this information.
- Section 3.12 Cultural Resource/page 3.12-28 Impact Assessment Methodology There are several historical/cultural resources that were not included that are in the peripheral sphere of the Project site: Crystal Cave in Devil's Arroyo which was a quartz mine, several artifacts and potential sites in Owl Canyon that were uncovered by the devasting wildfire of 2008, the cow cistern in Owl Canyon, the site, with some remain foundation, of the ranch house that served the dairy farm that was in Guadalupe Valley, to name just a few that have been overlooked. The Quarry itself and their many abandoned and or

buried equipment and structures, as well as the quarried benches, are in and of itself, historical and cultural resources that should not be ignored or disregarded.

Chapter 3.13: Noise and Vibration [Mary Rogers]

- Page 614 – Footnote 3 – The City's construction noise ordinance (Municipal Code Section 8.280.060) is not well tailored for determining the Project's impacts to sensitive receptors because no sensitive noise receptors are located at the Project site boundary. Therefore, for this noise analysis, noise levels would have to exceed 86 dBA at the building of the nearest noise-sensitive land use to result in a significant noise impact, instead of at the Project property plane as required by the City's Municipal Code Section 8.280.060b. For the City's Municipal Code Section 8.280.060.a, the Project Applicant would request an exception permit pursuant to Municipal Code Section 8.280.080 for construction noise levels greater than 83 dBA at 25 feet from the source thereof.
    - **RECOMMENDATION: that a noise analysis be conducted in collaboration with the residents of the Ridge; Lipman School District; and residents close to the jobsite. We really don't know what the impact will be until we understand the level of noise.**
- Page 619**: THIS IS SIGNIFICANT!**
- **Table 3.13-13** The project noise resulting from project traffic along Valley Drive,

Impact NOI-1: The Project would cause a significant impact related to noise if any of the following would occur:

- **Related to Construction Hours:**
  - **Project-related construction activities would occur outside the following construction hours specified in Section 8.28.060 of the Brisbane Municipal Code:**
    - **7 a.m. to 7 p.m. on weekdays; and**
    - **9 a.m. to 7 p.m. on weekends and holidays.**
- **Related to Construction Noise:**
  - **Project-related construction activities would result in noise levels that would exceed 86 dBA at the building of the nearest noise-sensitive land use.**
- **Related to Operation Noise**
  - **Any operational off-site traffic would exceed the noise thresholds shown in Table 3.13 7 at nearby noise-sensitive receptors**
  - **Any operational on-site noise sources would exceed the noise thresholds specified in Brisbane Municipal Code Sections 8.28.030 and 8.28.040 at a receiver as shown in Table 3.13-8.**

Significance Determination: Significant Unavoidable

Guadalupe, and Bayshore Blvd will likely be 24/7 throughout the project construction and post project completion. Heavy truck volume is expected to increase noise levels for EVERYONE within the Brisbane city limits.

- **Page 629 Vibration - THIS IS SIGNIFICANT! Likely vibration will occur 24/7 during and post project. Requesting analysis be conducted in collaboration with the residents of the Ridge; Lipman School District; and residents close to the jobsite.**

Impact NOI-2: The Project would cause a significant impact if vibration levels caused by construction or operation would exceed the following criteria related to vibration damage, as shown in Table 3.13 9, or vibration annoyance, as shown in Table 3.13 10.

Significance Determination: Less than Significant

Chapter 3.14: Public Services [Mary Rogers]

Page 637 – The fire protection and emergency services statistics from 2022 to 2023 highlight a concerning increase in response times. In 2022, the average response time per call was 4:02 minutes, but by 2023, this had risen to 5:50 minutes – a troubling increase of 1:48 minutes. This rise in response time is alarming, especially considering the potential for further delays due to increased traffic congestion along Bayshore and the Valley corridor, where hundreds of trucks are constantly in transit. The worsening gridlock could exacerbate response times even more.

As detailed in section 3.9 of the Transportation plan, the temporary travel lane closures caused by construction pose an even greater risk to emergency response efficiency. These closures could severely hinder emergency vehicles' ability to reach their destinations quickly, further jeopardizing public safety.

The bottom line is clear: We cannot afford to allow emergency response times to increase any further. Every second counts in emergency situations, and any delay could result in catastrophic outcomes. Immediate action is needed to ensure that response times are maintained at acceptable levels, safeguarding the well-being of all residents and visitors. Adherence to [General Plan, Community Health and Safety Element] Policy 163 (*"Continue to ensure a three-minute emergency response average and a ten minute average response to other calls for service.")* is a MUST but highly unlikely given the congestion along Bayshore and the Valley corridor.

Chapter 3.15: Wildfire [Michele Salmon]

General Comments:

- Author(s) of this section seem unfamiliar with the area and have mischaracterized the regional setting, the local setting, the surrounding terrain, the weather, the wind, and the vegetation – all of the elements that influence and exacerbate wildfire risk and intensity.
- Author(s) of this section seem unaware of past wildfire history in this area and make no mention of it.
- Consider that there is a mischaracterization of the wildfire threat and that it is much greater than indicated in this section and that problems with potential emergency evacuation of some additional 1,000 employees in this area have been glossed over and underestimated.

Specific Comments:

- Section 3.15 Wildfire, Table 3.15.2, page 3.15-3 This table makes no mention of three very high fuel plants that are prolific in this area – gorse, broom, and eucalyptus. The area to the north/northwest of the quarry, less than ½ mile away and adjacent to the proposed Project exit route, is very heavily covered with impenetrable highly-flammable gorse, along with broom which is also highly flammable. There is also an old grove of eucalyptus, also very flammable, in the old dairy ranch adjacent to the project area that is not slated for removal. To leave off three of the most dangerous wildfire plants were left of this list of vegetation types. To the northwest is Dairy Ravine and Devil's Arroyo, both heavily vegetated canyons that are very susceptible to wildfire.

- Section 3.15 Wildfire, Weather, page 3.15-3 to page 3.15-3 The weather for this area has been seriously mischaracterized, in specific, the wind. Not only is this area susceptible to Diablo offshore winds, as evidenced by the ashfall from the tragic Oakland fire, this area can become a wind tunnel for onshore winds. Wind speed is also very affected by the Venturi effect in which wind dramatically speeds up as it comes through the gap and down into Guadalupe valley.

- There is no mention of past conflagrations of wildfire in this area. We had the Wax Myrtle Fire – a controlled burn exercise that got out of hand when the wind came up and threatened homes at the NER. We had the devastating wildfire on June 22, 2008, started by a child arsonist, the devasted Owl Canyon, adjacent to the Quarry, and Buckeye Canyon, adjacent to Brisbane, that burned out of control for hours and prompted evacuations in central Brisbane. We had small, but potentially dangerous, fire involving gorse right behind Hensley Event Services on Westhill Drive that was believed to be sparked by a power pole.

- Although "evacuation" is mentioned several times in this chapter, there is no emergency evacuation plan and it is completely left up to the City: "In the event of a wildfire involving the Project development area, the City's Emergency Operations Center (EOC) would coordinate an immediate response and implement evacuation, if necessary." Page 3.15-15

Chapter 3.16 Recreation [Jason Nunan]

General Comments:

- Provided that all the mitigation that is proposed is enacted Recreation would seem to not be negatively impacted with the exception of access to Owl Canyon

Specific Comments:

- Although construction would only be temporary (10 months?) access to Owl and Buckeye would be greatly restricted during that time which the report minimizes.

Chapter 3.17: Energy [Anthony Walker]

An all-electric facility with no natural gas use is an excellent start!

The Project would build an all-electric building, eliminate the use of natural gas on the Project site, provide on-site solar PV and energy storage, and install EV charging infrastructure to promote the use of EVs and renewable energy. The Project building design is also oriented to

minimize solar heat gain and minimize use of active cooling systems in the office spaces while providing daylighting to reduce energy use for lighting.

All great! But my first question in each case is how much are we talking? Let's dig into the numbers. The Project would include a new, upgraded connection to the Martin/San Francisco Substation to replace the antiquated connection to the grid that currently exists. This connection would supply 10 MW of power capacity to the Project site for the all-electric building and to prepare for future EV charging demands (3.17-18). The facility is estimating **15,682 MWh/year of electricity usage** (3.17-14, Table 3.17-3).

Solar
As planned the project would exceed the required minimum 13,000 sqft of solar based on the size of the conditioned floor area and would comply with the 2022 Building Energy Efficiency Standards. Intended system size is estimated at **210.35kW of solar paired with 395.11kWh of battery storage** (3.17-17). Roughly estimated, this would mean an **annual production of 322.848 MWh – 341.697 MWh** (NREL PVWatts Calculator – https://pvwatts.nrel.gov/).

The current plan for 13,000 sqft of solar is a compliance minimum, representing less than 1% of the facility's energy needs. Expanding rooftop solar to utilize more of the estimated 500,000 sqft footprint of the building would significantly offset emissions, reduce grid dependency, enhance resilience, lower operating costs over time – especially in an all-electric facility, and be more closely aligned with Brisbane's 2040 climate goals.

Going as far beyond the minimum as possible is strongly recommended.

Storage & Emergency Backup
And this brings me to emergency diesel generators which are mentioned in passing as part of project operation emissions in the 3.7 Air Quality (3.7-36) and 3.8 Greenhouse Gas Emissions, but details like capacity, storage tanks, etc. seem to be missing.

The choice of emergency diesel generators to harden infrastructure here seems particularly inconsistent with the project's all-electric design and represents a step backward in the city's transition to clean energy. Diesel fuel storage also introduces potential environmental hazards, including spill risks, and would create unnecessary emissions that undermine the project's overall sustainability goals.

When you consider that the building will be all electric to begin with; and is already required to have some degree of solar and storage attached to the project, this requirement and the need to meet the facility's emergency backup needs could both be covered by simply expanding the amount of battery storage capacity.

For example, one Tesla Megapack offers 3.9MWh capacity, providing the same emergency backup functionality as diesel generators. But, add to that the ongoing benefits of:

- Using stored solar energy during hours when the sun isn't shining
- Infinitely scalable to meet the desired capacity – add as many MWh as you need
- Engaging in ongoing autonomous power market bidding through the Autobidder software platform to ensure the cheapest energy prices through arbitrage (buying low and selling high)

- The fact that any maintenance, hazards or costs associated with the purchase, installation or storage of diesel equipment and/or fuel would be completely and permanently eliminated

Given California's 2045 carbon neutrality target, the inclusion of diesel generators is counterproductive. Battery storage offers a more future-proof solution that aligns with the project's all-electric vision. This solution is an obvious long-term win for the environment the developer, the tenant and the city.

Electric trucks

In the case of the quarry development surely many other mitigation strategies will also be necessary, but heavy-duty trucks are particularly important as their diesel emissions would constitute the lion's share of ongoing operations emissions.

Recent mandates from the California Air Resources Board (CARB) under the Advanced Clean Fleets regulation (Title 13, California Code of Regulations §§ 2013 et seq.) require the shift to 100% zero-emissions trucking by 2035. That is roughly 7 years from 2027 – the earliest expected year of operation of this facility and would seem to apply. Given that timeline it would seem to make little sense to plan for and build out any new facilities or infrastructure that are not designed to meet or exceed these requirements as retrofits would be needed in fairly short order anyway to remain in compliance.

The nature of the relationship / agreement between the developer and any future tenant seems unclear at this point, so its difficult to say who would actually own or be in charge of the truck fleet in question, but it seems safe to assume that the responsibility to electrify said fleet would be on the eventual tenant of the property.

A minimum requirement for a clear and enforceable timeline and plan for compliance with the State of California Advanced Clean Fleets regulation seems in order. This makes me curious about whether any local reporting requirements are in place generally for existing facilities with regular heavy-duty vehicle trips as a part of their operations and how the city plans to encourage a timely transition and deal with non-compliance.

At any rate, the project does seem to be complying with all requirements and standards for heavy-duty EV charging by "provid[ing] a raceway and an additional capacity of 400 kilovolt-amperes (KVA) for transformers and service panels for medium and heavy-duty electric vehicle supply equipment (EVSE)". This is good and likely the most prudent course at this stage since it will be difficult to know what type of charging equipment would be needed until the electric fleet is identified / purchased. But it is unclear to me whether the planned raceway can support charging multiple heavy-duty electric trucks simultaneously as designed. Providing this detail is critical to evaluating the project's long-term compatibility with zero-emission fleet requirements.

Passenger Vehicles

Transportation exceeds CalGreen Tier 2 requirements with 1,544 parking spaces for passenger vehicles, 730 non-EV spaces, and 660 spaces being planned as "EV ready charging spaces". (2-12, Table 2.6-2) These numbers however seem to be inconsistent with the statements made in 3.8-19, Table 3.8-4 that "fifty percent of the passenger vehicle spaces would be EV-ready or have EV supply equipment (EVSE) installed".

Either scenario exceeds the CalGreen Tier 2 requirements, but 50% of 1,544 would be 772 EV spaces, which is not the number stated previously. In any case, this all seems like a step in the right direction – however I would prefer more clarification on how much of which type of charging support can actually be expected.

My understanding is that an “EV ready” space only requires a 120v receptacle at the space while a Level 2 EVSE charger requires a 208/240 volt, 40 amp circuit. This represents a **big** difference in usability (and probably actual usage) for the end user! Trickle charging in 120v “EV ready” spaces would technically be possible but at roughly 30-50 miles added per day, likely inadequate to cover the commutes of a majority of employees. A majority Level 2 EVSE installed is the preferred solution.

Chapter 3.18: Population and Housing [Barbara Ebel]

I have a religion and it’s called Jobs Housing balance. Every city tries to get more jobs than housing because of the way funding works. However, this is a very destructive mechanism, perverting the whole system. San Mateo County is projected to grow 10% in the next 15 years. Brisbane is currently home to 2636 workers and provides 6769 jobs. While no one can ensure that those who live in Brisbane work in Brisbane, providing a comparable number of workers and jobs is key to setting the stage for a good, healthy society. This project would add another 800-1500 jobs and no housing. On this basis alone it should be rejected unless they can somehow aid in the conversion of parts of Crocker into residential within the overlay zoning. Housing must be coupled with this project somehow. Since the site is not zoned for housing, perhaps a fund for the development of housing elsewhere. We cannot keep adding jobs and not housing, it’s unethical. We cannot wait for the Baylands housing to come through, we already have a large deficit and the completion of the Baylands will not help as even Baylands will provide more jobs than housing and ultimately deepen our deficit.

Chapter 3.19: Agriculture and Forestry [Barbara Ebel]

This section largely talks about how it doesn't apply since there is no farmland and no forests. However, 491 trees will be removed and currently only 202 will be planted. In lieu fees are one option, but I would rather see an active planting and maintenance plan as part of the development agreement for the other 289 trees so that the money doesn't slip away.

Chapter 4: Cumulative Analysis [Jason Nunan]

General Comments:

Provided that all of the mitigation proposals were rigorously followed agree with the majority of the report's conclusions, i.e. that the project would be less than significant. Much would depend upon rigorous adherence to the mitigations proposed.

Specific Comments:

- Disagree with conclusion that the project would not interfere with emergency operations for Fire Department, etc. With many vehicles on the road making deliveries and hundreds of employee vehicles this would present a major challenge in an acute emergency.
- 4-22 Paleontology: Where would any paleontological objects be delivered to? City of Brisbane? San Bruno Mountain Watch? Representatives of the Ohlone people?

- 4-26 Agreed with report conclusion that impact on water quality and erosion would be significant. Mitigation HAZ-1 would need to be closely followed to ensure safety of our residents.
- 4-29 Biological Resources: As found with development and the HAFP at the Ridge offering up ground in exchange for space currently used by endangered species in no way guarantees the fauna will migrate to the newly dedicated area. It's a great idea but has zero science behind it and we can see from the areas on the Ridge dedicated to open space that the butterflies have not moved to that area after having been displaced.
- Similarly, Mitigation Measure BIO-7 would be undertaken with great optimism that the wildlife would indeed adapt to the new area it is being offered.
- 4-35 Greenhouse Gas Emissions: While probably technically accurate the report concludes that the overall impact of the project with greenhouse gases would be less than considerable. In a rather facile way this reasoning depends upon the assumption that the warehouse's existence would reduce the OVERALL emissions for the region. This might be true, but the fact remains that greenhouse gases in Brisbane would be greatly increased and make the current goal of carbon neutrality impossible to achieve.
- Transportation 4-38: Agreed with report conclusion that increase of Vehicle Miles Traveled would be significant.
    - Disagree that mitigations of pedestrian, bicycle and transit access will have a robust enough effect to actually combat let alone neutralize this increase. It's doubtful given our location and the geography that modest inducements will actually drop personal vehicle usage significantly.
- Water Facilities 4-42 Tentatively agree with report conclusion that project would be less than considerable in impact with water pressure for the City, however here too the Mitigation Measure UTIL-2 would need to be rigorously followed.
- Given that the report concludes that the project will in fact impair our goal of carbon neutrality and this aligned somewhat with the number of employee vehicles **can there be a City of Brisbane Payroll tax that will capture for Brisbane funds to be used for further mitigation?** *We know from experience that a Sales Tax in this situation will be less than effective as revenue generating since sales are not actually occurring.*

Chapter 5 – Alternatives

General Comments:

[Erin Becker] In the event that the Project is not approved, the City has authority to approve any of the Alternatives described in this section. We urge Council to not use that authority and instead to give each potential project the same rigorous review that it deserves.

[Mary Rogers] **The proposed project should be subject to a vote by the citizens of Brisbane through a special election, as its potential impacts on our community and environment are significant and concerning.**

This project threatens to exacerbate traffic congestion, undermining efforts to reduce Vehicle Miles Traveled (VMT) and worsening transportation efficiency. It fails to meet the necessary environmental sustainability goals, contributing to increased greenhouse gas emissions and hindering the city's commitment to carbon neutrality. Moreover, the project would result in inefficient energy consumption and create harmful noise pollution, particularly in sensitive areas.

Additionally, the necessary changes to water infrastructure would disrupt resources and cause further environmental harm. These cumulative effects pose unacceptable risks to the well-being of Brisbane residents and the long-term health of our environment.

Given these concerns, the decision on this project should not be left to a few but should be determined by the people most affected—Brisbane's residents. We urge that the project be put to a special election, allowing the community to directly voice its opinion and ensure the protection of our future.

Transportation -

Impact TRAN-1: Project operations would generate a per capita VMT for home- based work trips by Project employees that would not meet a per capita VMT of 30 percent below the existing Bay Area regional average. Despite implementation of all feasible mitigation measures, the Project would exceed the City's per-employee VMT threshold.

− Cumulative Transportation Impact: The Project, in combination with past, present, and probable future projects, would contribute to a cumulative VMT exceeding 30 percent below the regional baseline average.

Greenhouse Gas Emissions –

Cumulative Greenhouse Gas Impact: The Project, in combination with past, present, and probable future projects, would contribute to a significant cumulative impact from VMT on achieving carbon neutrality and avoiding conflicts with plan, policies, or regulations adopted to reduce GHG emissions.

Energy –

Impact EN-1: Project operations would consume energy to power employee vehicles in a wasteful or inefficient way because the Project would generate a per capita VMT for home-based work trips by Project employees that would not meet a per capita VMT of 30 percent below the existing Bay Area regional average.

Noise -

Impact NOI-1: Project construction would result in noise levels that would exceed 86 dBA at the building of the nearest noise-sensitive land use.

− Cumulative Noise Impact: The Project would result in noise levels that would exceed 86 dBA at cumulative project sensitive receptors.

Utilities –

Impact UTIL-1: The project would require relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects.

− Cumulative Utilities Impact: The Project, in combination with past, present, and probable future projects, would contribute to a significant impact because of constructing new water utilities.

[Barbara Ebel]

The DEIR seems to conflate the developer's goals with Brisbane's "overarching vision." For example, the botanical garden alternative was rejected because it doesn't meet the goal of "enhance[ing] public safety by improving emergency access in the Project area," but it would be far more compatible with Brisbane and the state's GHG reduction goals. I also don't see that a Botanical Garden would necessarily fail to provide emergency access. It would depend entirely on implementation. The pandering made this section almost unbearable.

Before I can truly respond to this section, I need to check that these emissions are per capita? The DEIR seems to state that Alternative #1 is the superior project because the emission are lower because the number of people employed is lower. This seems to indicate that they have simply subtracted emissions when subtracting people. It is more useful to compare the scenarios on a per capita basis to see which alternative is more efficient as in the Baylands EIR.

Specific Comments:

[Erin Becker]

- [Section 5.2.3, page 5-5] – The Botanical Garden alternative was not considered, but we disagree with the reasoning. We recommend the DEIR re-assess this alternative. Our counter arguments follow.
    - Table 5.2-1 states *"A botanical garden would not contribute to the City's ability to provide public services or provide a positive fiscal impact on the local economy."* First, education is a public service. We assume the botanical garden would be open to the public and could have a teaching/education center. Second, the only objective this does not meet is to *"Provide a positive fiscal impact on the local economy through the creation of jobs, generation of tax revenue, and payment of other development fees that contribute to the City's ability to provide services",* which we think should be re-assessed.
    - Table 5.2-1 states *"A botanical garden would not enhance public safety by improving emergency access in the Project area."* We do not understand this logic. Further, Quarry Road is wide enough for emergency vehicles. Per SMARA, the quarry has to be reclaimed for safety, and the landowner has an existing bond to pay for it. A Botanical Garden will have less safety impacts to the community than a freight forwarding center that has trucks on our roads from 5am to 10pm every day.
- [Section 5.2.4, page 5-5] Why does the analysis of Off-Site Alternatives assume that the Freight Forwarding facility has to be in Brisbane? It seems like a site closer to SFO would make more sense. Further, why does this analysis also assume the quarry has to be developed for industrial uses?
- [Section 5.3.4, page 5-11] The "*No Project Alternative – Continuation of Existing Plan, Policy, or Operation"* has a disconnect. Section 5.3 states that mining will cease in 2027 and be followed by 7 years of reclamation. The owners have an existing bond for reclamation (per SMARA). Further, the critical equipment is broken and is too expensive to replace given current market conditions. Therefore, the DEIR is suspiciously using scare tactics to say that the mining operations could continue for 30 years. We

recommend the author readdress all of Section 5 or the City hire a different author to assess the alternatives.