



City of Brisbane

Open Space and Ecology Committee

Meeting Agenda

Wednesday, August 26, 2026 at 6:30 PM • Hybrid Meeting • 50 Park Place, Brisbane, CA

The public may observe/participate in Committee meetings using remote public comment options or by attending in person. Committee Members shall attend in person unless remote participation is permitted by law. The Committee may take action on any item listed in the agenda.

To Address the Committee

In Person:

Location: 50 Park Place, Brisbane, CA 94005, Community Meeting Room

Masks are no longer required but are highly recommended in accordance with California Department of Health Guidelines. To maintain public health and safety, please do not attend in person if you are experiencing symptoms associated with COVID-19 or respiratory illness.

Remote Participation:

Members of the public may observe/participate in the Committee Meeting by logging onto the Zoom Webinar listed below. Please be advised that if there are technological difficulties, the meeting will nevertheless continue.

The agenda materials may be viewed online at brisbaneca.org at least 24 hours prior to a Special Meeting, and at least 72 hours prior to a Regular Meeting. Archived videos can be replayed on the City's website, brisbaneca.org/meetings.

Remote Public Comments:

Remote meeting participants may address the Committee members via the Zoom Webinar or Call In Number. Meeting participants are encouraged to submit public comments in writing in advance of the meeting to aetherton@brisbaneca.org. Emails will not be monitored during the meeting.

Join Zoom Webinar: zoom.us (please use the latest version: zoom.us/download)
brisbaneca.org/osec-zoom

Webinar ID: 976 4295 0160

Call In Number: 1 (669) 900-9128

Note: Callers dial *9 to "raise hand" and dial *6 to mute/unmute.

Special Assistance:

If you need special assistance to participate in this meeting, please contact Adrienne Etherton at aetherton@brisbaneca.org or (415) 259-1107. Notification in advance of the meeting will enable the City to make reasonable arrangements to ensure accessibility to this meeting.

Call to Order

Roll Call

- A. Consider any request of a committee member to attend the meeting remotely under the “Emergency Circumstances” of AB 2449

Adoption of the Agenda

Announcements

Oral Communications

Approval of the Minutes

- B. Minutes of July 22, 2026

Old Business

- C. Discussion of June 2026 OSEC Comment Letter on Baylands Specific Plan and FEIR

New Business

- D. Discussion of Quarry Innovation Center Project: Notice of Preparation of Recirculated Draft EIR

Staff Updates

Subcommittee Reports

Calendar Items

Chair and Committee Member Matters

Next Meeting

- E. September 23, 2026

Adjournment



CITY of BRISBANE

Open Space and Ecology Committee Meeting Minutes

Wednesday, July 22, 2026 at 6:30 P.M. • Hybrid Meeting 50 Park Place, Brisbane, CA

CALL TO ORDER – 6:31 PM

ROLL CALL

- A. Consider any request of a committee member to attend the meeting remotely under the “Emergency Circumstances” of AB 2449

Committee members present: Becker, Carney, Rogers, Salmon, Walker. Nunan attended remotely.

Staff members present: Sustainability Manager, Etherton; Management Analyst, Brown.

ADOPTION OF THE AGENDA

Rogers moved to adopt the agenda and Salmon seconded; the motion was adopted unanimously.

ANNOUNCEMENTS - Salmon mentioned the upcoming Habitat Restoration Day on Saturday July 25th.

ORAL COMMUNICATIONS – An email from resident Chris Florkowski regarding a potential (near) Zero Waste initiative for Day in the Park was shared with the Committee.

APPROVAL OF THE MINUTES

- B. Minutes of June 17, 2026 – Salmon moved to approve the minutes and Rogers seconded. The motion was adopted unanimously.

NEW BUSINESS

- C. Presentation on 2025 Vegetation Management Work Completed - Tim Buonaccorsi, Recon Environmental
- Committee received a presentation from Tim Buonaccorsi, Habitat Restoration Director at Recon Environmental, on vegetation management work completed in 2025 on San Bruno Mountain.
- D. Consider 2026 Vegetation Management Proposal from Recon Environmental
- Committee considered 2026 Vegetation Management Proposal from Tim Buonaccorsi at Recon Environmental.
 - Recon Environmental to complete an invasive species assessment free of charge on the newly added parcels and report back to Etherton to inform next year's plan.

- Salmon moved to accept Recon’s proposal, Rogers seconded. The motion was adopted unanimously.
- Etherton to follow up with Buonaccorsi regarding the sale of invasive plants at local stores.

E. Zero Waste Day in the Park Discussion

- Committee discussed steps toward implementing a Zero Waste Day in the Park. Committee requests that staff coordinate with Parks & Recreation on asking vendors to consider utilizing compostable materials, including making a digital flyer with guidance.
- Events Subcommittee to meet to further discuss ideas.

STAFF UPDATES

- Etherton updated Committee on Baylands development – Planning Commission hearing July 23; no official timeline on Council meetings.
- Etherton shared the Housing decertification/Builder’s Remedy with Committee.
- Etherton mentioned how SB54 and other legislation and judicial rulings are causing uncertainty regarding the local Disposable Foodware Ordinance and updated Committee on the recent actions of County Sustainability staff to identify possible ordinance updates, if needed.

SUBCOMMITTEE REPORTS AND REORGANIZATION

- Events (Becker, Salmon) – Meeting to be scheduled to discuss upcoming Day in the Park.
- Education and Outreach (Rogers, Walker) – none
- Climate Action Planning (Becker, Walker) – Becker added.
- Open Space Plan update (Nunan, Rogers, Salmon) – none
- *Crocker Trail Frog Habitat (Nunan, Rogers) – none
- Tree Subcommittee (Carney, Rogers, Salmon) – no new business. Staff to follow up with updated information on frog habitat.
- Liaisons (Rogers, Walker) – none
- PCA Grant (Becker, Salmon) – none
- Dark Skies (Becker, Salmon) – none
- Invasive Species (Carney, Salmon) – Salmon added.
- Sierra Point Park Planning (Rogers) – none
- Baylands FEIR/SP Comments (Becker, Carney, Walker) – none
- Shoreline Restoration (Carney, Nunan, Salmon) – none
- Beautification (Mary and others) – Rogers reported on developing Adopt-a-Spot initiative and City landscaping goals.

CALENDAR ITEMS – Coastal Cleanup Day September 19; Annual report due to CalRecycle and Building Efficiency report due to the State in August

CHAIR AND COMMITTEE MEMBER MATTERS – none

NEXT MEETING: August 26, 2026

ADJOURN – 8:07 PM

**Open Space and Ecology Committee
City of Brisbane**

June 24, 2026

Brisbane Planning Commission
City of Brisbane
50 Park Place
Brisbane, CA 94005

Re: OSEC Comments on the Baylands Final Environmental Impact Report and Specific Plan

Dear Chair and Members of the Planning Commission,

On behalf of the Open Space and Ecology Committee (OSEC), thank you for the opportunity to comment on the Baylands Final Environmental Impact Report and the May 2026 Specific Plan. The comments that follow represent OSEC's review of these documents and our recommendations to the Commission as it considers whether to forward them to the City Council.

OSEC wishes to be clear at the outset that we regard the Baylands as a fundamentally compelling vision. The transformation of a long-contaminated, underutilized site into an all-electric, transit-oriented, mixed-use district with substantial housing, restored habitat, and significant open space has the potential to be a landmark sustainable development — a model that could help lead Brisbane and the region into the future. Our comments are offered in that spirit. A project of this ambition is worth getting right, and getting it right is precisely why the details matter.

It is in that constructive spirit that OSEC raises its concerns. Across our review, a consistent theme emerges: while the project's goals are ambitious and commendable, the Final EIR and Specific Plan defer or remove a number of the mechanisms that would ensure those commitments are actually achieved and sustained over the project's decades-long buildout. Our highest-level recommendations are these:

First, OSEC respectfully recommends that the Commission not advance the Final EIR and Specific Plan to the City Council until the documents have been thoroughly reviewed and the substantive concerns raised in these comments addressed, and that a qualified CEQA peer review — including CEQA legal review — be conducted to verify regulatory compliance and resolve inconsistencies between the Specific Plan and the FEIR.

Second, OSEC recommends that long-term greenhouse gas tracking, public reporting, and accountability mechanisms be restored as a condition of advancing the project. The revised analysis does not reduce the project's projected emissions; it reclassifies them, changing the significance determination while the emissions themselves remain. At the same time, it removes the very mechanisms that would let the City verify whether the project's anticipated benefits — its transit-oriented design, vehicle electrification, and other climate-forward features — actually have the intended impact on emissions over time. The City is, in effect, being asked to accept the projected benefits of these measures while giving up its ability to confirm they are real. For the

largest development project in Brisbane's history, OSEC believes those tools should be restored, not removed.

Third, OSEC recommends that the project's commitment to energy neutrality under Measure JJ be treated as the binding design requirement the voters adopted. Because on-site generation is not projected to meet the development's energy needs at any stage of buildout, OSEC recommends that the shortfall be matched by new, additional, local energy resources that deliver genuine and lasting benefit to the Brisbane community.

These are our principal asks, but they are not the whole of our review. The comments that follow address these and other matters in detail — including long-term stewardship of the landfill cap and its associated exposure restrictions, the proposed school siting, the Bayshore Mobility Plan and its treatment in the Project Description, urban forestry and biological resources, and sea-level-rise resilience — and we ask that each be given the Commission's full consideration.

Finally, OSEC thanks City staff for providing a redline version of the documents, which was helpful in tracking the changes between drafts, and we respectfully request clearer and more consistent communication regarding the review and approval process going forward. OSEC also expresses its full support for the joint comment letter submitted by the Sierra Club and the other organizations and members of the public who offered comment on the project.

Thank you for your time and your careful consideration of these comments.

Respectfully submitted,

Anthony Walker

Chair, Open Space and Ecology Committee
City of Brisbane

General Specific Plan Comment

General Comments:

- Recommend a peer review of the Specific Plan and previous CEQA iterations. This peer review should be conducted by a qualified CEQA consultant, with an in-house CEQA attorney, to verify the FEIR and supporting tech studies (including but not limited to the project-specific Geotech report, Phase I ESA, VMT, BRA, and JD) is compliant with CEQA and other regulatory agencies. Based on the revisions of the DEIR, and FEIR review, it was determined that several components of the FEIR are not consistent with federal and State regulations, including CEQA, and must be rectified prior to approval. Additionally, the Specific Plan must be peer reviewed concurrently with the Baylands FEIR to identify several inconsistencies amongst the two Baylands CEQA documents. This will ensure that environmental impacts are minimized to a less than significant level, as well as avoiding potential City litigation.
- OSEC respectfully recommends that the Planning Commission not forward the Final EIR and Specific Plan to the City Council at this time. These documents should be available for full and careful review, and should be evaluated thoroughly, before they are advanced. The prior Draft EIR was available for review over a period of several months, and reviewers nonetheless found that timeframe insufficient to fully evaluate the document. The Final EIR and revised Specific Plan incorporate substantial changes from the prior drafts — including significant revisions to the environmental analysis and the removal of previously proposed mitigation — yet are being considered on a markedly compressed schedule. Given the size, complexity, and significance of these documents, the number and substance of the changes introduced since the Draft EIR, the inconsistencies between the Specific Plan and the FEIR noted below, and OSEC's recommendation that a qualified CEQA peer review be conducted, OSEC believes the documents are not yet ready to advance. OSEC recommends that the Commission allow the additional time it determines is necessary for the public, OSEC, and the Commission itself to review these materials thoroughly, and for the substantive concerns raised in these comments to be addressed, before any recommendation is forwarded to the City Council. Identifying and incorporating meaningful improvements now will produce a stronger and more defensible project than advancing the documents before that review is complete.

Baylands FEIR

Chapter/Section: Chapter 3 – Project Description

General Comments:

- The Project Description does not state estimated tree removal and proposed replacement at a minimum 1:1 ratio. This should be quantified to show adherence to Brisbane Municipal Code Requirements regarding tree removal and replacement. This should be addressed in the Project Description for clarity.

Specific Comments:

- ES 4.2/ES-10 & 3-138 – A recent revision was made to the approvals and permits required from responsible and trustee agencies “Water supply permit amendment from the State Water Resources Control Board, Division of Drinking Water **Santa Clara District.**” The project site is located within the San Francisco District for the Regional Water Quality Control Board. Please verify that the “Santa Clara District” referenced in the most recent revision remains accurate based on the location of the proposed project site and associated Regional Board jurisdiction.
- ES 4.2/ES-11 – Amongst the listed approvals for the proposed project, including obtaining relevant permits from the CDFW and USACE, the FEIR states that a 1602 SAA and Section 404 permit are required. However, the list of anticipated discretionary actions and approvals lists the need for a Waste Discharge Requirement (WDR) from the RWQCB, and does not include a Section 401 permit issued by the RWQCB, often paired with a Section 404 permit issued by the USACE (not a WDR)w. Should a 404 permit be anticipated, a 401 permit from the RWQCB should be required/referenced in this list.
- 3.3/3-33 – The following revision could conflict with water quality standards set forth by the RWQCB. “Lagoon Park improvements would follow completion of Title 27 landfill closure activities, which would remove existing vegetation for placement of a low-permeability landfill cap over the existing refuse layer along with landfill gas and leachate control systems (see Section 2.5.3, Title 27 Final Landfill Closure, for a description of Title 27 landfill closure requirements).” Although stormwater treatment and bioretention areas are proposed, the revised “low permeability” allows potential discharge that may seep into project stormwater runoff, resulting in lower water quality in adjacent aquatic features (i.e., lagoon, wetlands, creek, etc.).

Chapter/Section: 4.6 Biological Resources

General Comments:

- **All CEQA-related comments in the DEIR have been incorporated into Section 4.6.**
- The baseline conditions of the project site are based on studies dating back to 2023. Although appropriately timed and included four subsequent years of surveys between 2019 through 2023, baseline biological conditions may have changed. Some biological surveys (i.e., jurisdictional delineations) may no longer remain valid, as baseline conditions may change in the span of three years. A biological survey is recommended to confirm existing biological conditions on-site prior to development of the proposed project. Should additional sensitive biological resources be detected on-site, in addition to those identified in the previous FEIR, be avoided and mitigated, as appropriate per CEQA guidelines.

Specific Comments:

- Section 4.6/4.6-62 – The FEIR contains additional mitigation language regarding burrowing owl habitat assessments, focused surveys, and pre-construction surveys for the species. As a part of the proposed burrowing owl avoidance measure, it is recommended the mitigation measure include the preparation and CDFW approval of a project-specific Burrowing Owl Mitigation Plan, outlining consultation efforts and plans to avoid and relocate potential burrowing owl within the project site, if detected during the recommended focused surveys.

Chapter/Section: 4.8 Transportation

General Comments:

- Overall, the expanded bike access and readily available shuttles will almost certainly be a green direction to go.

Specific Comments:

- Section 4.8.5, FEIR (Project Description) & Appendix F (Bayshore Mobility Study) – The Bayshore Mobility Plan proposes a significant reconfiguration of Bayshore Boulevard, including a "road diet" reducing the roadway from four lanes to two along the project's western boundary. Although the FEIR includes the Mobility Plan within its Project Description and ties the development to it through Mitigation Measure MM TRA-3f (which obligates the project to implement the plan's features or pay a fair-share fee), the plan's substantive design specifications reside in an FEIR appendix while the Specific Plan addresses it only through a consistency requirement (Program C.1.b). This arrangement creates two concerns. First, a reconfiguration of an existing arterial that forms the project boundary is an offsite physical change with potential environmental effects — including

emergency vehicle access, intersection operations and idling, and redistribution of vehicle trips — that should be analyzed as a clearly defined component of a stable project description, rather than deferred to appended material that may be revised after certification. Second, because the project is financially and functionally linked to the plan, its key design parameters should be incorporated into, or bindingly cross-referenced by, the Specific Plan so that they are enforceable, reviewable by the public, and stable through buildout. OSEC recommends that the FEIR analyze the Bayshore Mobility Plan's roadway changes as a defined element of the Project Description, and that the Specific Plan be revised to incorporate the plan's governing design parameters rather than relying on a general consistency policy. OSEC further recommends that the road diet component be reconsidered in light of the access, emergency response, and circulation concerns raised separately in these comments.

- Specific Plan Section 3.4.6 / FEIR Response M-CSSC-8 – OSEC supports the concept of establishing parking maximums from the outset as a forward-thinking demand-management measure. OSEC recommends, however, that the FEIR and Specific Plan clarify what mechanisms will ensure the parking maximum is enforceable and effective over time — including how compliance will be monitored and what measures prevent residents or businesses from exceeding intended vehicle counts through informal or off-site parking arrangements. Without a clear enforcement mechanism, the parking maximum may not achieve its intended VMT- and congestion-reduction benefits.

Chapter/Section: 4.9 Open Space and Habitat

General Comments:

- Recommend incorporating development standards that support urban forestry principles within the Baylands Specific Plan Area. All developed areas are recommended to adhere to International Society of Arboriculture (ISA) principles for urban forestry development standards, including the following:
 - Baylands Specific Plan Area
 - Adhere to the City of Brisbane's tree canopy percentage goals
 - Increase species diversity, using California natives
 - Replace all trees removed at a 1:1 ratio, using California native species and methodology appropriate for the planting conditions (i.e., balled-burlapped, container, and/or field-grown container, as applicable, due to limited planting depth at tree maturity)
 - No net loss of canopy
 - Streets
 - Replace all street trees removed at a 1:1 ratio, using California native species and methodology appropriate for the planting conditions (i.e.,

- ball-and-burlapped and/or field-grown container, as applicable, due to limited planting depth at tree maturity)

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Chapter/Section: 4.11 Energy Resources / Measure JJ Consistency

General Comment:

- OSEC requests additional clarification regarding the City's interpretation of Measure JJ's Energy Neutral requirement. Measure JJ states that "Baylands development shall be designed so as to be energy neutral on an ongoing basis." At the same time, Measure JJ requires that "Baylands development shall be revenue positive to the City." Both provisions were adopted by Brisbane voters using similarly mandatory language. However, throughout project review, the Revenue Positive requirement appears to be treated as a binding performance constraint, while the Energy Neutral requirement is interpreted more flexibly.
- OSEC recognizes that the City possesses discretion in implementing and interpreting voter-adopted policies. The issue is not whether the City had discretion. The issue is how that discretion was exercised when two voter-adopted requirements came into tension. The FEIR would benefit from a clearer explanation of how the City reconciled these competing objectives and why one was treated as a binding constraint while the other was interpreted more flexibly.

Specific Comment:

- The FEIR should more clearly explain how the proposed project satisfies, or is deemed consistent with, Measure JJ's requirement that Baylands be "energy neutral on an ongoing basis." The FEIR acknowledges that on-site renewable generation would provide only a portion of projected electrical demand, yet concludes that the project remains consistent with Measure JJ. If the City's position is that procurement of renewable electricity through utility programs satisfies this requirement, the FEIR should explicitly describe that interpretation and explain how it aligns with the intent of the voter-adopted measure.
- OSEC further notes that Energy Neutrality was not merely an operational objective but a design requirement. Measure JJ does not state that Baylands should attempt to be energy neutral if convenient or economically favorable. Rather, it states that the development "shall be designed so as to be energy neutral on an ongoing basis." It is therefore reasonable to ask whether alternative development approaches, land use mixes, building programs, or on-site energy strategies were considered that would have more fully achieved this objective. The FEIR does not clearly explain why Energy Neutrality was treated as a constraint to be interpreted around rather than a design criterion to be achieved.
- **Timing and sufficiency of on-site renewable generation relative to the Energy Neutral requirement** – OSEC's concerns regarding Measure JJ's Energy Neutral requirement are heightened by the project's own disclosures regarding the timing and ultimate capacity of on-site generation. The majority of the project's renewable generation is the [55-acre] ground-mounted solar farm, which cannot be constructed until the underlying Title 27 landfill closure is complete for the relevant portions of the site. Because the applicant estimates landfill closure will take approximately [10 years] from the commencement of soil

removal, the project will be substantially dependent on grid-supplied power throughout an extended interim period, with the ground-mounted array phased in only as cap completion allows. More significantly, the FEIR's own Net On-Site Energy Consumption Analysis [Table 4.11-7] indicates that on-site generation never meets total on-site demand at any milestone: approximately [34.2%] at partial Phase 1 [2037], [50.2%] at Phase 1 buildout [2038], and a maximum of approximately [53.5%] at full buildout [2042]. The project therefore remains a net consumer of grid electricity across its entire lifecycle, relying on the procurement of off-site renewable electricity (primarily through Peninsula Clean Energy) to satisfy the remaining [46.5% to 65.8%] of demand. OSEC further notes that the project's battery storage, while valuable for reliability and for shifting daytime solar generation to evening use, does not generate additional energy and therefore does not reduce this gap between on-site generation and demand.

Because this shortfall is acknowledged in the FEIR's own analysis and not disputed, the central question is no longer only whether the analysis was adequate, but what should be required in response.

OSEC further notes that the off-site procurement relied upon to bridge this shortfall, while enforceable, does not represent energy the project itself generates or causes to be generated. The Specific Plan's Sustainability Framework requires development within the Baylands to enroll in Peninsula Clean Energy's 100 percent renewable ECO100 option, codified through CC&Rs and leases. OSEC supports this mandate and does not question its enforceability. However, enrolling in ECO100 matches the project's consumption against renewable supply that PCE procures for its service territory as a whole; it does not, in itself, cause new renewable generation capacity to be built that would not otherwise exist, and it requires nothing of the development's own design. There is a meaningful difference between a development designed to generate its energy needs — which is what Measure JJ's "designed so as to be energy neutral" language calls for — and one designed to a different program that then procures renewable electricity from the regional provider to cover the difference. The latter option is available to any electricity customer in San Mateo County and demonstrates nothing about how the development itself was designed.

OSEC's recommended remedy follows directly. Where the project cannot be designed to meet its energy needs on-site, the FEIR and conditions of approval should require the developer to fund or provide an equivalent quantum of new, additional, local energy resources — local renewable generation or storage sited to benefit the Brisbane community — scaled to the disclosed on-site shortfall and to the larger interim shortfall during the years before the ground-mounted solar farm is operational. Unlike retail procurement, such a requirement would represent a real, additional, local contribution that the project itself brings into being, giving the Energy Neutral requirement genuine effect — so that a project that cannot be designed to meet the requirement on-site is at least required to deliver equivalent, lasting local benefit.

Chapter/Section: 4.13 Hazards and Hazardous Materials

General Comments:

- OSEC recognizes that site remediation and landfill closure activities are subject to extensive regulatory oversight. However, several aspects of the proposed remediation strategy rely upon long-term engineering controls, land-use restrictions, maintenance requirements, and institutional controls that may remain in place for decades. OSEC recommends additional clarification regarding how these requirements will be communicated, monitored, enforced, and periodically reviewed over the life of the project.
- The FEIR provides substantial information regarding remediation design and regulatory approvals but provides less detail regarding long-term stewardship. OSEC encourages the City to identify clear mechanisms for ensuring future property owners, tenants, businesses, and residents remain aware of applicable land-use restrictions, maintenance obligations, and environmental controls necessary to protect public health and safety.
- **Long-term communication, inspection, and enforcement of land-use and planting restrictions** – OSEC recognizes that the FEIR and supporting closure documents establish a layered framework for protecting the integrity of the landfill cap and remedial soil caps, including recorded Land Use Covenants, mandatory disclosure in leases and deeds, codified planting and food-gardening restrictions, HOA-administered ongoing information, and periodic inspection and five-year review requirements. OSEC's concern is not that these mechanisms are absent, but that their long-term effectiveness depends heavily on sustained institutional performance over a 20- to 30-year buildout and in perpetuity thereafter — including reliable disclosure at every future real estate transaction, consistent HOA administration across decades of board and management turnover, and ongoing awareness among residents, tenants, and businesses who were not party to the original approvals. The FEIR would benefit from additional detail regarding how these requirements will remain effective over time. In particular, OSEC recommends clarification of: (1) how planting and food-gardening restrictions — including the prohibition on growing produce in native soil and the requirement to use raised beds and bottomed containers — will be communicated to individual residents and tenants in a durable, accessible form beyond incorporation by reference in legal instruments, given that these restrictions address a foreseeable and resident-initiated exposure pathway; (2) who holds responsibility for inspecting private landscaping and gardening activity for compliance with root-depth and planting restrictions, and how that responsibility is allocated among the HOA, individual owners, and the City or State; and (3) what enforcement mechanisms and funding are in place if disclosure fails, if the HOA does not perform its informational and oversight role, or if non-compliant planting is identified. OSEC recommends that the FEIR and conditions of approval identify a clear, adequately funded, and enforceable party responsible for the long-term stewardship of these restrictions, rather than relying primarily on disclosure obligations and association governance that may weaken over the life of the project.

- **Reiteration of OSEC's objection to the proposed school siting** – OSEC's prior comments raised detailed concerns regarding the appropriateness of the proposed middle school location, including its immediate adjacency to Bayshore Boulevard and associated exposure to aerially deposited lead and diesel particulate matter, its proximity to high-risk facilities including the [PG&E Martin Substation], the Caltrain corridor, and the former [Lazzari Fuel Company] site, and the broader concern — informed by the nearby Midway Village experience — that capping and partial remediation have not reliably protected human health on comparable sites. OSEC continues to hold these concerns and reiterates its objection to the proposed siting. OSEC recognizes that the FEIR does not dismiss these issues, and that Response [M-OSEC-387] identifies a future regulatory pathway — preparation of a Preliminary Endangerment Assessment by the school district as lead agency, compliance with the State school siting criteria of [CCR Title 5, Section 14010], and DTSC certification that remediation within [Operable Unit SM] is complete prior to development. OSEC's concern is that these mechanisms defer the determination of the site's suitability for children to a future process rather than resolving it now, and that a conclusion of "less than significant with mitigation" rests on studies that have not yet been performed. Deferral of the safety determination is not equivalent to a present demonstration that the site is appropriate for a school. Given that the receptors at issue are children, for whom there is no safe level of lead exposure, OSEC's position is that the burden of demonstrating suitability should be treated as a threshold question rather than a downstream one, and continues to recommend that an alternative, lower-risk location for the school be given serious consideration rather than relying on future assessment to validate a siting decision made now.

Chapter/Section: 4.14 Hydrology and Water Quality

General Comments:

- OSEC supports the inclusion of sea-level-rise adaptation measures and resilience-oriented design standards throughout the Specific Plan. However, it is important to recognize that all sea-level-rise projections are ultimately forecasts based on the best available science at a given moment in time. Recent years have demonstrated that climate science continues to evolve rapidly as new observations become available and previously unprecedented climate impacts occur with increasing frequency. While the FEIR appropriately relies on current scientific guidance, it should also acknowledge the substantial uncertainty inherent in projecting conditions many decades into the future.
- Because future conditions may differ materially from today's projections, long-term resilience depends not only on designing for current estimates but also on maintaining the flexibility, governance structures, monitoring programs, and funding mechanisms necessary to adapt as new information emerges. A resilient system is not one that assumes today's projections are correct. It is one that remains effective even when those projections prove incomplete.

Specific Comments:

- Response M-OSEC-85 references flood-protection standards and adaptive design features but does not directly address OSEC's concern regarding long-term implementation, monitoring, governance, and funding. Given projections of approximately 83 inches of sea level rise by 2100, OSEC recommends additional clarification regarding how adaptation measures will be funded, maintained, monitored, and updated if future conditions differ from current projections.
- OSEC further notes that sea-level rise is fundamentally linked to anthropogenic climate change. Adaptation and mitigation should therefore be viewed as complementary rather than independent strategies. While adaptation measures are necessary to address future flooding and shoreline impacts, long-term resilience ultimately depends upon both preparing for climate impacts and reducing the greenhouse gas emissions that drive those impacts. Decisions regarding emissions and adaptation should therefore be understood as interconnected components of a broader climate resilience strategy. Focusing exclusively on adaptation without maintaining accountability for emissions risks treating symptoms while neglecting the underlying driver of the problem.

Chapter/Section: 4.18 Parks, Open Space & Recreation

Specific Comments:

- Section 4.18.5/4.18-22 – The threshold criteria for Impact REC-2 focuses more on Physical Deterioration of Candlestick Point Wildsurfing Resources, however, the latest CEQA handbook identified minimum analysis criteria as follows: (Impact REC-2) The proposed project would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. This CEQA section does not evaluate the potential adverse effects of the construction of the 64.8-acre of additional recreational facilities in portions of sensitive habitat. This must be addressed for CEQA compliance.

Chapter/Section: 4.21 Program EIR Mitigation Measures

Specific Comments:

- 4.21/11 – MM AES-5a minimizes daytime glare, including the usage of non-reflective building materials. However, no mention of bird-safe building design is mentioned to reduce potential bird strikes. The MBTA and CDFW protect migratory birds, thus, bird-safe design requirements/approval is recommended to further reduce potential impacts.
- 4.21-19 – MM BIO-1d minimizes impacts to burrowing owl through pre-construction surveys in accordance with CDFW 2012 protocol. However, it does not specify the window in which the surveys should be conducted. CDFW protocol for burrowing owl requires one survey 14 days prior to ground disturbance and a second survey 24 hours prior to construction. Recommend to add for MMRP tracking.
- 4.21-19 – MM BIO-1d minimizes impacts to nesting birds through avoidance and minimization measures, including pre-construction buffers and Environmental Sensitive Area (ESA) buffers should surveys be positive for active bird nests. Recommend to revise the current “no disturbance buffer of 150 fee” to a buffer of 250 feet for non-raptors, and 500-feet for raptors (per CDFW guidelines), or a reduced buffer deemed appropriate in consultation with CDFW.

Chapter/Section: Chapter 12 – Agencies Contacted and Commenters on the Draft EIR

General Comments:

- OSEC's prior comments repeatedly asked for stronger greenhouse gas accountability, including enforceable commitments, local mitigation options, transparent verification, future project-level GHG monitoring, and alignment with Brisbane's 2040 net-zero goal. The FEIR responses largely do not address the substance of those concerns. Instead, many responses simply refer to General Response 6 and Chapter 15, which remove Threshold GHG-1 and the associated impact analysis from the Final EIR.
- The practical effect is that the FEIR addresses greenhouse gas accountability concerns primarily by changing the significance determination rather than by reducing, tracking, or otherwise managing the projected emissions themselves. While the City has discretion to adopt this approach, it should be recognized as a deliberate policy decision to remove previously proposed accountability mechanisms, not simply a technical refinement of the environmental analysis. This decision also creates a significant tension with Brisbane's adopted Climate Emergency Declaration and its stated goal of achieving net-zero greenhouse gas emissions by 2040. The FEIR repeatedly notes that Baylands is not the vehicle for implementing those goals; however, if the City's largest development project is not expected to measure, track, or materially contribute toward those commitments, it becomes increasingly difficult to understand how those commitments will ultimately be achieved.
- The FEIR's revised approach relies heavily on the premise that Baylands' transit-oriented design, VMT reduction measures, all-electric buildings, EV infrastructure, jobs-housing relationships, and other climate-oriented features will produce beneficial greenhouse gas outcomes. These may very well be positive features, and OSEC generally supports many of them. However, the FEIR removes the very mechanisms that would allow the City to verify whether these anticipated benefits are actually achieved over time. If actual emissions are not tracked and reported, Brisbane will have no way to determine whether the project's urbanist design assumptions performed as expected, exceeded expectations, or fell short. This includes key assumptions regarding transportation behavior, vehicle electrification, transit use, and the relationship between jobs, housing, and commuting patterns. The City is effectively being asked to accept the projected climate benefits of these measures while relinquishing its ability to evaluate their real-world effectiveness.
- The central recommendation is that the Baylands Specific Plan should not be approved unless long-term GHG tracking, public reporting, and a mechanism for future accountability are restored as conditions of approval.
- OSEC is also concerned about the precedent this approach may set. Baylands is likely to be among the largest and most consequential developments in Brisbane's history. If a project

of this scale can have its long-term emissions accountability removed on the basis that it incorporates other climate-forward design features, future applicants may reasonably expect comparable treatment, and the City may find it difficult to apply consistent accountability standards to subsequent development. Retaining a modest tracking and reporting framework for Baylands would help preserve the City's ability to hold future projects to consistent standards and would support the forthcoming update to the Climate Action Plan.

Specific Comments:

- General Response 6, Responses to GHG Comments, pp. 13-23 to 13-36 – General Response 6 acknowledges that many commenters questioned the reliability, feasibility, and enforceability of GHG offset credits. However, rather than strengthening the accountability framework, the FEIR removes Threshold GHG-1 entirely and the associated GHG mitigation structure and claims that therefore nothing must be done. This response does not adequately address OSEC's broader concern that actual project emissions still matter and should be tracked over time. The projected 51,260 MTCO₂e of annual emissions have not gone anywhere – all that has changed is that someone has chosen a legal framework that doesn't require anyone to do anything about them.
- Response M-OSEC-83, p. 13-301 – OSEC asked for enforceable commitments, financial guarantees, and a stronger local VMT-reduction / vehicle electrification strategy. The response refers to General Responses 5 and 6 and Chapter 15, but does not provide a replacement accountability mechanism after removing Threshold GHG-1. The response should be revised to identify how actual emissions will be measured, reported, and addressed over the life of the project.
- Response M-OSEC-271, pp. 13-419 to 13-420 – OSEC specifically recommended integrating real-world fuel mix and EV adoption data into future project-level monitoring and GHG reporting. The response again relies on existing modeling and the removal of Threshold GHG-1. This is insufficient. Because vehicle technology and grid emissions are changing rapidly, the FEIR should require periodic updates using real-world data rather than relying only on static projections.
- Responses M-OSEC-282 through M-OSEC-293, pp. 13-425 to 13-429 – OSEC raised concerns about offsets, local mitigation, the Climate Emergency Declaration, and the need for direct, flexible, enforceable local action. The responses largely refer back to General Response 6. This does not address the underlying policy question: if Brisbane's largest development project is not required to measure or mitigate actual emissions outcomes, how will Brisbane maintain a credible path toward its 2030 and 2040 climate goals?
- Response M-OSEC-288, p. 13-428 – OSEC proposed a Climate Mitigation and Resilience Fund as a local fallback mechanism if sufficient qualifying offsets could not be procured.

The response rejects this solely by reference to the removal of Threshold GHG-1. Even if CEQA no longer requires offset mitigation, the City may still choose to require local GHG accountability as a policy condition of approval, development agreement term, or Specific Plan implementation requirement, and OSEC recommends it do so.

- Response M-OSEC-289, p. 13-428 – OSEC requested transparent verification and authority to deny permits if contribution or offset requirements were not met. The response does not provide a comparable enforcement mechanism after the offset framework is removed. If the City removes the prior offset and true-up structure, it should replace it with a transparent reporting and accountability framework rather than leaving no meaningful emissions-performance backstop of any kind.

Chapter/Section: Chapter 15 Draft EIR Revisions: Section 4.10, Greenhouse Gas Emissions Resources

General Comments:

- The revised GHG analysis changes the question from whether the project will result in a net increase in greenhouse gas emissions to whether the project is consistent with selected climate-oriented design and policy criteria. This may support a revised CEQA significance determination, but it does not answer the local governance question of whether Brisbane will track and manage the actual emissions consequences of the largest development project in the City's history.
- The FEIR should not treat consistency with regional climate policy as a substitute for local emissions accountability. A project can include many positive climate-forward design features and still materially affect Brisbane's emissions inventory.
- Reclassifying the project's greenhouse gas impact as less than significant does not reduce or eliminate the emissions themselves; it only removes the legal obligation to address them. The projected emissions remain, and simply because the project is one the community supports, does not make them any less the City's problem. OSEC's concern is that removing the developer's obligation to measure, report, and mitigate these emissions does not eliminate the cost of managing them — it transfers that cost. If accountability is not established at the point of approval, the responsibility for any future measurement, mitigation, adaptation, and emissions-reduction effort associated with this development will fall to the City, the community, and the public budget. OSEC believes the Commission should weigh this allocation of long-term cost and responsibility carefully: a decision not to require accountability from the developer now is, in effect, a decision to absorb that burden publicly later.

Specific Comments:

- Section 4.10 revisions / removal of Threshold GHG-1 – Removing Threshold GHG-1 eliminates the prior outcome-based framework for determining whether the project results in a net increase in GHG emissions. If a consistency-based threshold is used, the FEIR should still retain separate project-level emissions tracking and public reporting as an implementation requirement.
- Section 4.10 revisions / removal of GHG mitigation and true-up – The FEIR removes the offset requirement, GHG Emissions Reduction Plan, and periodic true-up process. At minimum, the FEIR should restore a non-punitive monitoring framework requiring periodic measurement and public reporting of actual project emissions throughout buildout and operation, including transportation, energy, water/wastewater, and stationary source emissions.
- Section 4.10 / projected emissions – The project is still projected to generate approximately 51,260 MTCO₂e annually, most of which is associated with mobile sources – i.e. vehicles / transportation. Even if transportation emissions are treated differently because of regional VMT and fleet-electrification dynamics, the remaining non-mobile emissions are still substantial. At approximately 5,832 MTCO₂e annually, these emissions are roughly one-third the magnitude of Brisbane’s entire 2023 community-wide natural gas emissions inventory (18,183 MTCO₂e). While this comparison is not intended to imply that Baylands will use natural gas, it illustrates the scale of the remaining emissions. In fact, it is noteworthy that a development of this size is projected to add emissions of *only* this magnitude. However, emissions at this scale are not at all insignificant and still large enough to warrant continued measurement, reporting, and oversight rather than complete removal of long-term accountability mechanisms.
- Section 4.10 / VMT and mobile emissions – VMT remains useful for evaluating land-use efficiency, congestion, and transportation impacts, but it is an increasingly imperfect proxy for GHG emissions as California’s fleet electrifies and the grid decarbonizes. The FEIR should require future reporting that distinguishes vehicle miles traveled from fossil-fueled vehicle miles traveled, EV adoption, and real-world fleet emissions.
- Section 4.10 / characterization of Brisbane’s climate commitments – OSEC notes a change in how the City’s adopted climate commitments are described between the Draft EIR and the Final EIR. The Draft EIR referred to Brisbane’s 2030 and 2040 GHG reduction objectives as ‘articulated emissions reduction targets,’ while the Final EIR refers to the same commitments as ‘aspirational goals.’ Although this may appear to be a minor wording change, it reflects a meaningful shift in emphasis: a target is something decision-makers are expected to pursue and achieve, whereas an aspiration is more readily acknowledged and then set aside when other priorities arise. OSEC is concerned that this recharacterization both understates the City’s own adopted commitments and could be relied upon as precedent to justify reduced accountability in future approvals. OSEC recommends that the FEIR restore language consistent with the Draft EIR and continue to treat Brisbane’s adopted 2030 and 2040 commitments as targets to be pursued.

Chapter/Section: Chapter 17 Mitigation Monitoring and Reporting Program

General Comments:

- The MMRP should not only confirm installation of climate-oriented project features. It should also include ongoing GHG tracking and reporting so the City, future Councils, OSEC, and the public can understand whether the project is performing better, worse, or roughly as projected.
- Monitoring without emissions performance data is not accountability. It is a checklist.

Specific Comments:

- GHG monitoring – Add a requirement for periodic project-level GHG reporting throughout buildout and operation. Reporting should compare actual performance against FEIR projections and should be made publicly available.
- Implementation triggers – Require GHG reporting at major project milestones, such as phase approvals, certificate of occupancy milestones, and recurring intervals after operation begins.
- Adaptive governance – The City should preserve the ability to consider future mitigation, local investment, or emissions-reduction measures if actual emissions materially exceed projections or if future Climate Action Plan updates establish additional implementation frameworks.

Overall Recommendation:

OSEC recommends that the Baylands Specific Plan not be advanced for approval unless GHG tracking and accountability are restored.

More broadly, OSEC's comments throughout this document reflect a consistent concern: that the Final EIR and Specific Plan, while ambitious and in many respects commendable, defer or remove a number of the mechanisms that would ensure the project's commitments are actually achieved and sustained over its decades-long buildout. The principal recommendations across these comments are summarized below. OSEC respectfully offers them not as obstacles to the project, but as the means by which a development of this scale and significance can be made stronger, more accountable, and more durable.

- **Process and review.** OSEC recommends that the Planning Commission not advance the Final EIR and Specific Plan to the City Council until the documents have been thoroughly reviewed and the substantive concerns raised in these comments addressed, and that a qualified CEQA peer review, including CEQA legal review, be conducted to verify regulatory compliance and to resolve inconsistencies between the Specific Plan and the FEIR.
- **Energy neutrality (Measure JJ).** The FEIR does not demonstrate that energy neutrality was treated as the binding design requirement Measure JJ establishes. On-site generation is projected to meet only a portion of demand, and not until late in buildout, with the remainder met through retail renewable procurement that the project neither generates nor causes to be built. Where on-site neutrality is not achieved, the FEIR and conditions of approval should require an equivalent quantum of new, additional, local energy resources scaled to the disclosed shortfall.
- **Hazards and long-term landfill stewardship.** The effectiveness of the landfill cap and the associated planting and food-gardening restrictions depends on communication, inspection, and enforcement sustained over decades and across institutional turnover. The FEIR and conditions of approval should identify a clear, adequately funded, and enforceable party responsible for long-term stewardship.
- **School siting.** OSEC reiterates its objection to the proposed middle school location and its concern that deferring the determination of site suitability to a future regulatory process is not equivalent to a present demonstration that the site is appropriate for children.
- **Transportation and the Bayshore Mobility Plan.** The Bayshore Mobility Plan is a significant offsite change that should be analyzed as a defined component of the Project Description and incorporated into the Specific Plan rather than deferred to an appendix, and the road diet component should be reconsidered in light of emergency-access and circulation concerns.
- **Open space, biological resources, and hydrology.** OSEC recommends incorporating ISA-based urban forestry standards, native-species diversity, 1:1 tree replacement, and no-net-

loss-of-canopy goals into the Specific Plan; updated pre-development biological surveys and a project-specific Burrowing Owl Mitigation Plan; and clear long-term funding, monitoring, and governance for sea-level-rise adaptation measures, together with acknowledgment of the substantial uncertainty in long-range projections.

- **Greenhouse gas accountability.** Most significantly, and as elaborated in the discussion that follows, OSEC recommends that long-term GHG tracking, public reporting, and accountability mechanisms be restored as a condition of advancing the project. OSEC agrees that Baylands should not be expected to solve Brisbane's entire climate challenge. However, it is reasonable to expect Baylands to account for and report on its own emissions impacts over time.

The FEIR projects approximately 51,260 MTCO₂e annually at buildout, equivalent to roughly 60 percent of Brisbane's entire 2005 community-wide greenhouse gas inventory. At the same time, Brisbane has achieved only modest progress toward its adopted climate goals, reducing emissions by just over 15 percent below the 2005 baseline as of the most recent inventory. Without meaningful accountability, the scale of emissions associated with Baylands risks overwhelming much of the progress already achieved by the community while making future reductions even more difficult.

The City has previously recognized the importance of ongoing greenhouse gas inventories and annual reporting through its Climate Action Plan. In practice, those inventories have often been difficult to produce consistently and on schedule. Given the size and significance of the Baylands project, it is reasonable to require the developer to track, measure, and publicly report emissions associated with the development itself. This would provide future decision-makers, OSEC, and the public with the information needed to evaluate actual project performance and maintain a credible pathway toward Brisbane's adopted climate commitments.

The issue is not whether Baylands must eliminate every ton of greenhouse gas emissions. The issue is whether the largest development project in Brisbane's history should be advanced for approval while simultaneously removing the mechanisms that would allow those emissions to be measured, understood, and managed over time.



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**CORRECTED REVISED NOTICE OF PREPARATION
of Recirculated Draft Environmental Impact Report for the
Quarry Innovation Center Project
City of Brisbane with Updated Comment Period**

Date: First Issued on August 5, 2026 and corrected on August 6, 2026

To: State Clearinghouse
State Responsible Agencies
State Trustee Agencies
Other Public Agencies
Interested Organizations and Individuals
Property Owners in the Vicinity

From: Ralph Robinson
Consulting Planner
City of Brisbane
50 Park Place
Brisbane, CA 94005
rrobinson@brisbaneca.org

Subject: Revised Notice of Preparation of a Recirculated Draft Environmental Impact Report for the Quarry Innovation Center Project (SCH#: 2022060358)

Lead Agency: City of Brisbane

Project Title: Quarry Innovation Center Project

Project Location: 1 Quarry Road, Brisbane, San Mateo County, California 94005, (See Figure 1)

This Revised Notice of Preparation (NOP) is being circulated to account for revisions to the project description for the Quarry Innovation Center Project, formerly titled the Guadalupe Quarry Redevelopment Project. Since circulation of the previous NOP, the applicant has submitted revised Design Permit, General Plan Amendment, and Pre-zoning applications for an approximately 895,000 square-foot light fabrication building, including assembling, processing, treating, and packaging, with accessory uses including but not limited to office, research and development, storage, sales, and distribution; a 213,476 square-foot three level parking garage; amenity/utility areas; a 49.9-megawatt electrical substation and switching station; and overhead electrical transmission service with associated improvements, which would connect to existing high-tension electrical transmission lines owned and operated by Pacific Gas and Electric Company (PG&E) to the west of the Project site. These improvements, amendments and entitlements are collectively referred to as the Quarry Innovation Center Project (Proposed Project). The Proposed Project would not include a data center.

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15088.5(d) notice is hereby given that the City of Brisbane (City), as the Lead Agency, will prepare a Recirculated Draft Environmental Impact Report (Recirculated Draft EIR) for the Proposed Project. Pursuant to CEQA Guidelines Section 15206, the Proposed Project is considered a project of Statewide, regional, or areawide significance.

The City will prepare a Recirculated Draft EIR to examine the environmental impacts associated with the Proposed Project (as described in detail in the project description below) consistent with CEQA Guidelines Section 15161. The Recirculated Draft EIR will evaluate the Proposed Project's changes in the environment resulting from redevelopment of the existing Guadalupe Quarry. The Recirculated Draft EIR will evaluate the potentially significant impacts of the Proposed Project on a direct, indirect, and cumulative basis; identify mitigation measures that may be feasible to lessen or avoid significant impacts; and identify project alternatives that could reduce or avoid significant impacts. The Proposed Project, its location, and its potential environmental effects are described below.

In accordance with CEQA Guidelines Section 15082, the City has issued this corrected revised NOP to provide responsible agencies, trustee agencies, and other interested stakeholders with information describing the Proposed Project and its potential environmental effects. **A scoping session will be held on September 1, 2026, at 6:30 p.m.** The public scoping meeting will be held at the Community Meeting Room, Brisbane City Hall, 50 Park Place and remotely via Zoom. Details on how to attend the meeting can be accessed on the project website at: <https://www.brisbaneca.gov/Facilities/Facility/Details/Guadalupe-Quarry-Redevelopment-Project-29>.

During the scoping session, the City will solicit input from the public and agencies on specific topics they believe should be addressed in the EIR. The scoping process is designed to enable the City to determine the scope and content of the Recirculated Draft EIR and identify potentially significant environmental effects, alternatives, and mitigation measures to be analyzed in the Recirculated Draft EIR.

PROJECT LOCATION AND EXISTING CONDITIONS: The Project site is located in unincorporated San Mateo County and within the City of Brisbane’s Sphere of Influence, as shown in Figure 1. For purposes of this revised NOP and the Recirculated Draft EIR, the “Project site” encompasses a total of approximately 153 acres identified in the adopted 1994 Brisbane General Plan as the Quarry Subarea and portions of Quarry Road (Figure 2). The Project site is located south and west of Brisbane, west of US Highway 101 (US 101), and approximately 1.75 miles west of the San Francisco Bay. The Project site is surrounded on the east, west, and south by San Bruno Mountain State and County Park, and to the north by Crocker Industrial Park. Jurisdictions adjoining Brisbane are San Francisco to the north, Daly City and unincorporated San Mateo County to the west, and South San Francisco to the south.

The Project site encompasses the existing Guadalupe Quarry (quarry) and includes predominantly active quarry and undeveloped land for roadway improvements and undeveloped hillside land located on the east face of San Bruno Mountain. The Proposed Project also includes an off-site utility component. Project site boundaries are shown in Figure 2. The Project site is designated as Heavy Industrial and Open Space land use by San Mateo County General Plan and Open Space and Quarry Planned Development – Trade Commercial by the City of Brisbane General Plan and has a zoning classification of Heavy Industrial (M-2) by San Mateo County.

PROJECT BACKGROUND: In 2021, Orchard Partners, LLC, submitted General Plan Amendment and Pre-Zoning applications to the City to facilitate land use designation changes and annexation of approximately 59 acres of the approximately 146-acre existing quarry property into the City. In November 2022, Orchard Partners, LLC, submitted a Design Permit application for the development of a warehouse facility. In October 2024, the City circulated a Draft EIR analyzing the closure, reclamation, and redevelopment of the existing quarry to construct and operate a warehouse facility for public review and comment. In February 2025, the application and EIR processes were suspended at the direction of the applicant to facilitate a new project, which is the Quarry Innovation Center Project, as outlined in this NOP.

In November 2025, Orchard Partners, LLC, filed applications with the City to construct and operate the Proposed Project, an approximately 895,000 square-foot light fabrication building, including assembling, processing, treating, and packaging, with accessory uses including but not limited to office, research and development, storage, sales, and distribution at the existing Guadalupe Quarry site; a 213,476 square-foot three-level parking garage; amenity/utility areas; and a 49.9-megawatt electrical substation and switching station at the existing Guadalupe Quarry as well as an off-site utility component along an existing PG&E natural gas easement west of the Project site. The applicant is also expected to submit a tentative parcel map application to facilitate the subdivision of land for annexation into the City’s jurisdiction.

PROJECT DESCRIPTION¹: The Proposed Project includes closure, reclamation, and redevelopment of the existing Guadalupe Quarry to construct and operate a light fabrication building, a 49.9-megawatt electrical substation and switching station including associated electrical transmission lines and towers, and to preserve the upper benches and undeveloped areas of the quarry as protected open space. The proposed two-story light fabrication building would have a footprint of approximately 448,000 square feet, with a total area of approximately 895,000 square feet, and a maximum height of approximately 86 feet. A 49.9-megawatt substation would be constructed on an approximately

¹ It should be noted that elements of the Proposed Project may be subject to continued refinement after publication of this revised NOP and prior to consideration of project approval.

2.6-acre area in the western portion of the site that would also house a switching station to be operated by PG&E. The 49.9-megawatt substation and switching station is an electrical transmission service that would convey electricity via overhead electrical transmission lines from the existing 115 kilovolt electrical transmission lines on the ridge west of the Project site. The off-site utility component would consist of a new approximately 200-foot-tall electrical transmission tower at the western end of an existing PG&E natural gas easement within San Mateo County. Helicopters would be used to install the off-site electrical transmission tower and to install electrical transmission lines. A PG&E access road for its existing electrical transmission lines would be used to support construction of the new off-site electrical transmission tower. Approximately 1,700 feet of new overhead electrical transmission lines would be installed between the new off-site electrical transmission tower and a new approximately 200-foot-tall electrical transmission tower in the northwestern corner of the Project site. A third approximately 200-foot-tall electrical transmission tower would be constructed at the on-site switching station for final termination with approximately 1,120 feet of new overhead electrical transmission lines to be installed between the on-site electrical transmission towers. The light fabrication building and the substation and switching station would be surrounded by surface and garage parking; employee amenity space; internal access roads; and loading areas for employees, delivery vans, and trailers. Other associated accessory facilities and improvements would include landscaping, guard booth and security gates, lighting, perimeter fencing/walls, shuttle bus stops, food truck parking, and drainage facilities. The Proposed Project would include improvements to Quarry Road, which provides access to the Project site, and construction of a new secondary access road connecting South Hill Drive to the Project site.

To facilitate the development of the Quarry Innovation Center Project, the Applicant submitted a revised application with the City for a Design Permit, General Plan Amendment and Pre-Zoning and is expected to submit a tentative parcel map of the annexation site. The General Plan amendment would change the City General Plan land use designation (pre-annexation) from Planned Development-Trade Commercial to Quarry Trade Commercial. The pre-zoning of the annexation site would create a new zoning district with specific development standards, use regulations, and other design and performance standards. Approximately 2.1 acres of land in the open space site with an existing Planned Development-Trade Commercial land use designation would change to an Open Space land use designation. The Proposed Project would include annexation of approximately 104 acres of the Project site into the City of Brisbane, of which 36 acres would be designated open space protected via a conservation easement. Overall, the Project would preserve 82 acres of the Project site as dedicated public open space under San Mateo County's jurisdiction, or conserved habitat under a conservation easement that is annexed to the City of Brisbane.

To annex the Project site in accordance with General Plan policies, the Applicant is anticipated to submit applications to the San Mateo County Local Agency Formation Commission, as well as applications for approvals and permits from the County of San Mateo and State Division of Mine Reclamation for the quarry closure. Given the sensitive resources present in and surrounding the Project site, including the sensitive species and habitats in the adjacent San Bruno Mountain State and County Park, the Proposed Project is also expected to require approvals or authorizations from various federal and state agencies, including the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, California Department of Fish and Wildlife, and San Francisco Regional Water Quality Control Board.

The Project site includes sites listed on State databases compiled pursuant to Government Code Section 65962.5, such as the California State Water Resources Control Board online GeoTracker database and the California Department of Toxic Substances Control online EnviroStor database. The existing Guadalupe Quarry is included in the GeoTracker database. The off-site utility interconnection area west of the quarry property is not listed on any State databases.

EIR SCOPE: An Initial Study was not prepared. As the Lead Agency, the City will describe and analyze the impacts of the Proposed Project on the physical environment. The Recirculated Draft EIR will identify potential impacts to the following environmental resources, based on Appendix G of the State CEQA Guidelines:

Aesthetics
Agricultural and Forestry Resources
Air Quality
Biological Resources
Cultural Resources
Energy
Geology and Soils

Greenhouse Gas Emissions
Hazards and Hazardous Materials
Hydrology and Water Quality
Land Use and Planning
Mineral Resources
Noise
Population and Housing

Public Services
Recreation
Transportation
Tribal Cultural Resources
Utilities and Service Systems
Wildfire

As required by CEQA Guidelines Section 15126.6, the Recirculated Draft EIR will analyze a range of reasonable alternatives to the Proposed Project that would feasibly attain most of the Proposed Project's basic objectives, while avoiding or substantially lessening any of the Proposed Project's significant effects on the environment. The Recirculated Draft EIR will also identify other alternatives that were initially considered, but rejected for reasons including, but not limited to, infeasibility due to economic, legal, or other considerations, inability to meet most of the Proposed Project's basic objectives, or failure to avoid or substantially lessen any of the Proposed Project's significant environmental impacts. The City is seeking input on alternatives as part of the NOP process.

In addition, the Recirculated Draft EIR will address cumulative impacts, growth inducing impacts, and other considerations required by CEQA.

EIR PROCESS: Following the close of the corrected revised NOP comment period, a Recirculated Draft EIR will be prepared that will consider all NOP comments. In accordance with CEQA Guidelines Section 15105(a), the Recirculated Draft EIR will be released for public review and comment for the required 45-day review period. Following the close of the 45-day public review period, the City will prepare a Final EIR, which will include responses to all substantive environmental comments received on the Recirculated Draft EIR. The Recirculated Draft EIR and Final EIR will be considered by the City in making the decision to certify the Recirculated EIR and approve or deny the project.

SUBMITTING COMMENTS:

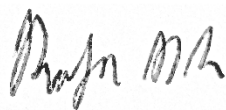
The corrected revised NOP comment period began on August 6, 2026, and ends on September 8, 2026, at 5:00 p.m.

Responsible and trustee agencies and other interested stakeholders are invited to provide written comments on the scope and content of the Recirculated EIR. Written comments should be directed to Ralph Robinson, the City's Consulting Planner, with "Quarry Innovation Center Project EIR" as the subject. Public agencies that provide comments are asked to include a contact person for the agency.

A scoping session will be held on September 1, 2026, at 6:30 p.m. The public scoping meeting will be held at the Community Meeting Room, Brisbane City Hall, 50 Park Place and remotely via Zoom. Details on how to attend the meeting can be accessed on the project website at: <https://www.brisbaneca.gov/Facilities/Facility/Details/Guadalupe-Quarry-Redevelopment-Project-29>.

Consistent with CEQA, comments should be submitted as early as possible, but no later than **5:00 p.m. on September 8, 2026**, by email or mail to:

Ralph Robinson, Consulting Planner
City of Brisbane
50 Park Place
Brisbane, CA 94005
rrobinson@brisbaneca.org



Ralph Robinson
City of Brisbane

Figure 1 Regional Location Map

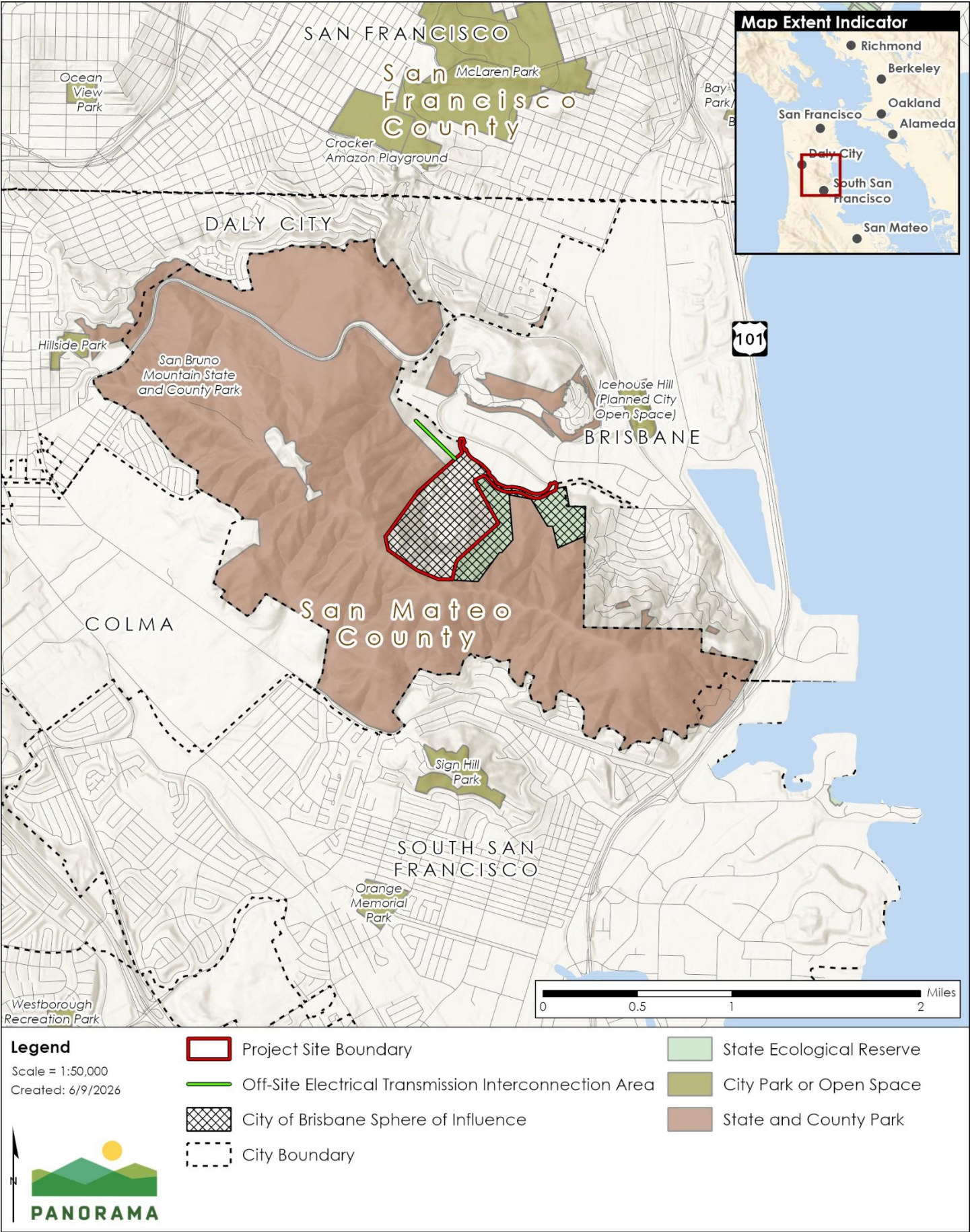
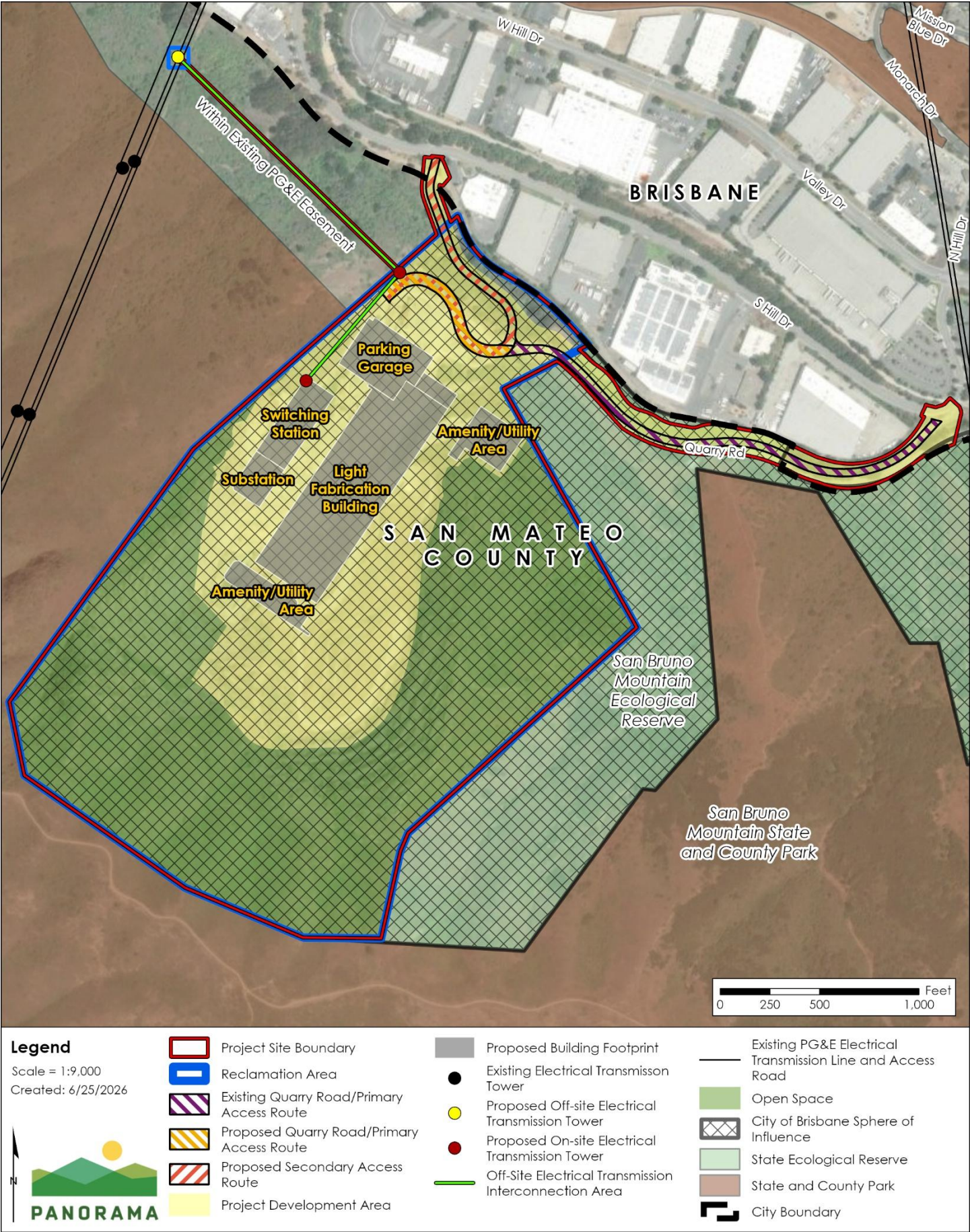


Figure 2 Project Site Map



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:

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". We 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 we 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 we 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. We would like to discuss potential options further.

- 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
- 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

- 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:

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?

Project Description is vague, somewhat ambiguous and unrealistic in their expectations.

Specific Comments:

- [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 2.10.2, 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/Warehousing 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 project in a dry year, so we shouldn’t give unchecked approval for a Data Center.
- Section 2.8.5– Economic Characteristics:
 - There is a reference to Sales Tax which we 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?
- **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 we 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

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

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 – no comments

Chapter 3.3: Geology, Soils, and Seismicity

[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

- [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

[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

[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

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 myrmecophily 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 OSEC member Salmon by her 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, Salmon has 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

“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 we think this may be underselling the problem. It seems fair 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. We will touch more on EV charging infrastructure in 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, we 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 we will go into more detail on this point in comments on Section: 3.17 Energy – “Storage & Emergency Backup”.

Chapter 3.8: Greenhouse Gas Emissions

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 we 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.”

We beg to differ. Putting annual emissions into net negative territory by comparing it to an already poor regional average seems like an overly rosy assessment at best. We 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 our opinion and not a reflection of the reality of the situation. We are 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, we 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 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.

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. We cannot fathom how this logic plays out. If one buys a teddy bear manufactured in South Dakota, and it travels to Brisbane via Livermore, or it travels via Guadalupe Quarry, it is not significantly different. Goods still need to be delivered -TO- the Guadalupe Warehouse from their origin. Seems 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.

We're 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. Our 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

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.*
- [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.

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

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

We had a hard time finding meaningful content in this section. 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. We 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

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. We 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.
- 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 devastating 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

- 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!**

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

- **Table 3.13-13** The project noise resulting from project traffic along Valley Drive, 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

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

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 devastated 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

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

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 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

Emergency diesel generators 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 it's 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 us 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 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 we would prefer more clarification on how much of which type of charging support can actually be expected.

Our 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

Sustainability requires 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

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 we 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

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:

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.

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.

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. We 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.

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:

- [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 warehousecenter 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 warehousing 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.