36-50 SAN BRUNO AVENUE PROJECT
CATEGORICAL EXEMPTION

LSA

July 2017

36-50 SAN BRUNO AVENUE PROJECT
CATEGORICAL EXEMPTION

Submitted to:

City of Brisbane
Building and Planning Department – Planning Division
50 Park Place
Brisbane, CA 94005

Prepared by:

LSA Associates, Inc.
2215 Fifth Street
Berkeley, California 94710
510.540.7331

July 2017

TABLE OF CONTENTS

FIGURES AND TABLES

FIGURES

TABLES

This page intentionally left blank.

INTRODUCTION

Article 19 of the California Environmental Quality Act (CEQA) Guidelines includes, as required by Public Resources Code §21084, a list of classes of projects which have been determined not to have a significant effect on the environment and, as a result, are exempt from review under CEQA. This document has been prepared to serve as the basis for compliance with CEQA as it pertains to the 36-50 San Bruno Avenue Project (proposed project). This document demonstrates that the project qualifies for a CEQA Exemption as an Infill Development Project (Class 32), consistent with the provisions of CEQA Guidelines Sections 15332 and 15300.2 and provides information for City of Brisbane decision-makers regarding a finding that the proposed project is exempt under CEQA.

In summary, this document demonstrates that the proposed project qualifies for an exemption under CEQA Guidelines Section 15332 as an infill development project as it: (1) is consistent with the General Plan designation and policies and Zoning regulations; (2) is located within the City limits, surrounded by urban uses and is less than 5 acres in size; (3) has no value for endangered, rare or threatened species; (4) would not result in any significant effects related to traffic, noise, air quality or water quality; and (5) can be adequately served by all required utilities and public services. Additionally, this document demonstrates that the project or its circumstances would not result in any exceptions identified in CEQA Guidelines Section 15300.2, and that the project qualifies for a CEQA Exemption as a Class 32 Infill Development Project.

PROJECT DESCRIPTION

The following describes the proposed 36-50 San Bruno Avenue Project (project). This section includes a summary description of the project's location and existing site characteristics, project components, required approvals, and entitlements. The City of Brisbane is the lead agency for review of the project under CEQA.

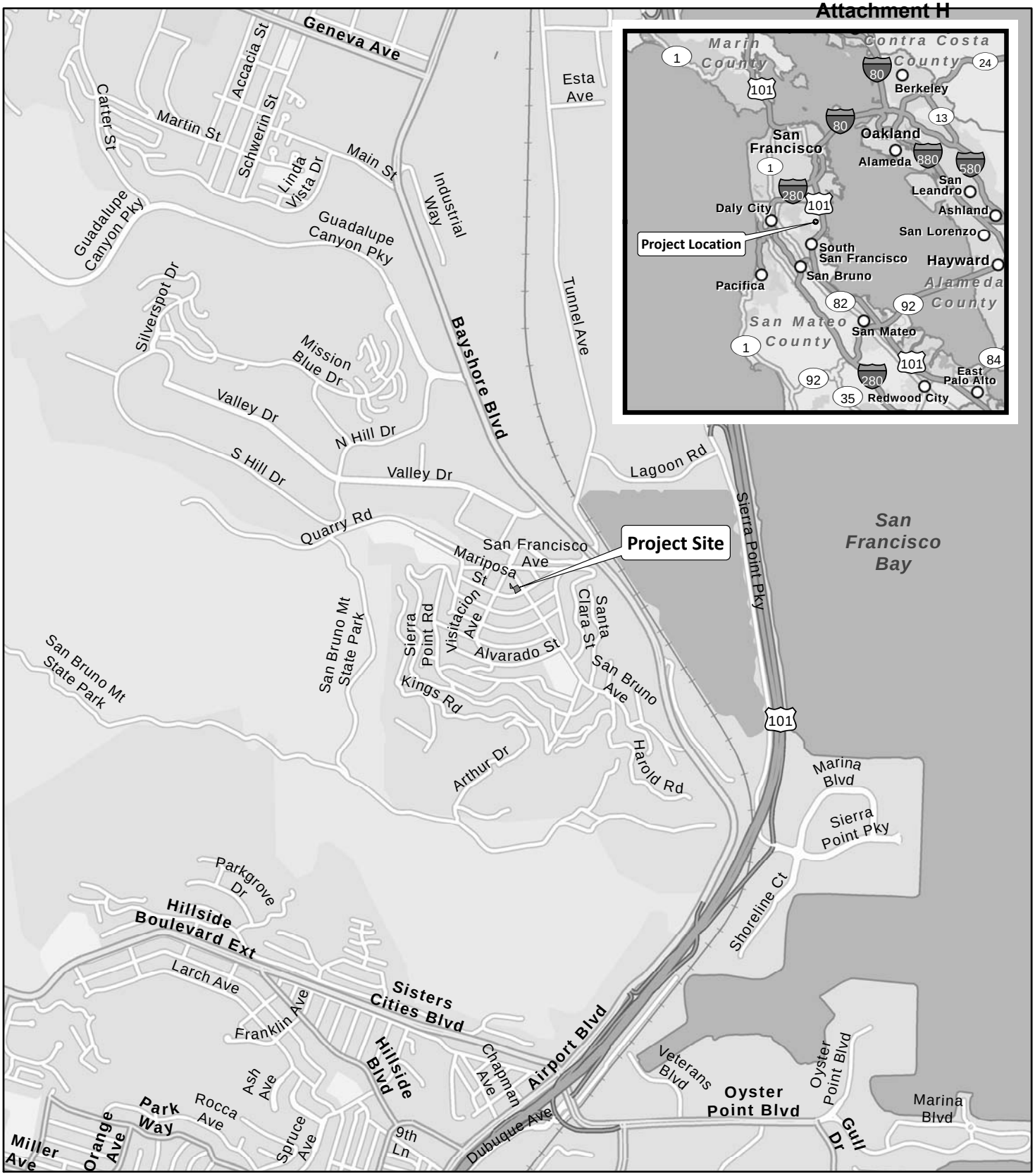
A. PROJECT SITE

The following section describes the location and characteristics of the project site and provides a brief overview of the existing land uses within and in the vicinity of the site.

1. Location

The approximately 0.22-acre (9,525-square-foot) project site is located at 36-50 San Bruno Avenue in the City of Brisbane in San Mateo County (Assessor's Parcel Numbers [APNs] 007-222-020 and -030). The site is bounded by the vacant Brisbane Teen Center to the north, San Bruno Avenue and multi-family uses to the east, residential uses to the south, and commercial and residential uses to the west with those uses fronting on both Visitacion Avenue and Mariposa Street.

Regional vehicular access to the project site is provided by US Highway 101 (US 101), which is located 0.75 miles east of the site. Figure 1 shows the site's regional and local context. Figure 2 depicts an aerial photograph of the project site and surrounding land uses.



LSA

FIGURE 1

N

0 1000 2000
FEET

SOURCE: ESRI STREETMAP NORTH AMERICA (2012).

I:\BRI1701 36-50 San Bruno Ave\figures\Fig_1.ai (6/23/17)

36-50 San Bruno Avenue Project
Project Location and Regional Vicinity Map

LSA

FIGURE 2

N

Project Site

0 100 200
FEET

SOURCES: GOOGLE EARTH 11/2/16; LSA, JUNE 2017.

I:\BRI1701 36-50 San Bruno Ave\figures\Fig_2.ai (6/23/17)

36-50 San Bruno Avenue Project
Aerial Photograph of Project Site

This page intentionally left blank.

2. Regulatory Setting

The City of Brisbane General Plan Land Use Map designates the project site as Neighborhood Commercial/Retail/Office (NRCO). The NRCO land use designation is devoted to a range of local retail and service uses, including shops, restaurants, medical, professional and administrative offices and other uses of the same general character. Public and semipublic facilities may be located under this designation. Commercial recreation, residential uses, warehouse and distribution facilities, and light industrial uses may be permitted conditionally in implementing zoning districts.[1]

The project site is designated as Downtown Brisbane Neighborhood Commercial (NCRO-2) on the City of Brisbane Zoning Map.[2] Permitted uses within the NCRO-2 district include financial institutions, medical facilities, offices, personal services, restaurants, retail sales and rental, and home occupations. Dwelling units are conditionally permitted within the NRCO-2 district only when part of a mixed-use project and when located above or behind nonresidential uses. Development standards within the NRCO-2 zoning district include no requirement for either a front setback or side setbacks, except when abutting a residential district. The required rear setback is 10 feet. The maximum height for structures is 35 feet when authorized by a design permit.[3]

3. Existing Site Conditions

The project site is generally level and currently developed with a small parking lot. There are a total of approximately 15 parking spaces on the project site that are not currently used. The sparse vegetation on the project site consists of street trees lining the sidewalk and patches of grass and shrubs around the perimeter and throughout the site. Existing site conditions are depicted in Figures 3a and 3b.

B. PROPOSED PROJECT

The components of the proposed project are described below. Figure 4 shows a conceptual site plan and floor plans of the proposed project. As described in more detail below, the proposed project would result in the construction of 16 senior apartments, 464 square feet of commercial space, and a 14-space parking garage. The proposed project would restrict future residents to persons 62 years old and older. The applicant is seeking a concession under State Density Bonus law, Government Code §65915(b) and (d), to allow for a rear setback concession, for a 1 foot rear setback where 10 feet would otherwise be required. The concession would be based on the inclusion of at least 10 percent of the total units for lower income households or at least 5 percent for very low income households.

1. Site Preparation

To prepare the project site for construction, the site would be graded to construct a building pad. Additionally, trenching for utility installation (electric, water, fire water, wastewater, and data) would occur. The total amount of soil cut from the project site for foundation pad construction would be approximately 186 cubic yards, with 119 cubic yards being exported and the remainder being used on

[1] Brisbane, City of, 1994. *City of Brisbane General Plan.* June 21.

[2] Brisbane, City of, 2003. *City of Brisbane Zoning Map.* July.

[3] Brisbane, City of, 2017. *Brisbane Municipal Code.* March 29.

site as fill for the pad. The grade outside the building pad would be only minimally changed to control stormwater on site. Eight trees would be removed as a part of the project.

2. Construction

The proposed project would include the construction of a new three-story mixed-use building on the project site. As shown on Figure 4, the ground floor of the building would be a 14-space parking garage, which would include 12 resident spaces and 2 guest spaces. In total, the parking garage would be approximately 5,650 square feet and would be accessible from San Bruno Avenue. The City's zoning ordinance does not require off-street parking for the storefront uses in the NCRO-2 zoning district, but rather street parking would be utilized for the commercial space.

In addition to parking, the ground floor would also include an area for secure bike storage, a restroom, a covered area for trash and recycling, and an elevator lobby. Additionally, the ground floor would include 464 square feet of commercial space fronting San Bruno Avenue. The building would be approximately 31 feet in height to the top of the parapet, and 33 feet in height to the top of the elevator, as shown in conceptual elevations in Figure 5. Conceptual visual simulations of the built project are shown in Figure 6.

The second and third floors of the building would each include 8 senior apartments, for a total of 16 units. Of the 16 units, 12 would be 545 square feet, and 4 would be 526 square feet. The combined floor area of the apartment units would be approximately 8,644 square feet.

Two of the units would be restricted for rental to Lower Income households and one unit would be restricted for rental to Very Low Income households in accordance with the City's Inclusionary Housing Ordinance and consistent with the State Density Bonus law requirements to allow for the setback concession.[4]

3. Open Space and Landscaping

The proposed project would include a total of 3,855 square feet of private open area on the project site. A total of 1,835 square feet of open area would be available to project residents in an interior, landscaped courtyard. An additional 592 square feet of landscaped area would be located along the western portion of the site. Finally, a 1,428-square-foot courtyard would also be available to project residents on the second floor of the building.

4. Utilities and Infrastructure

The project site is located in an urban area and is currently served by existing utilities, including: water, sanitary sewer, storm drainage, electricity, and telecommunications infrastructure. Existing and proposed utility connections are discussed below.

[4] Brisbane, City of, 2017. Brisbane Municipal Code, Chapter 17.31 – Inclusionary Housing and Density Bonuses. March 29.

Photo 1: View looking west towards Project Site from San Bruno Avenue

Photo 2: View looking east towards San Bruno Avenue from the Project Site

LSA

FIGURE 3a

36-50 San Bruno Avenue Project
Existing Site Conditions

SOURCE: LSA, 2017.

I:\BRI1701 36-50 San Bruno Ave\figures\Figures_3a-3b.ai (6/26/17)

Photo 3: View looking north along San Bruno Avenue

Photo 4: View looking south along San Bruno Avenue

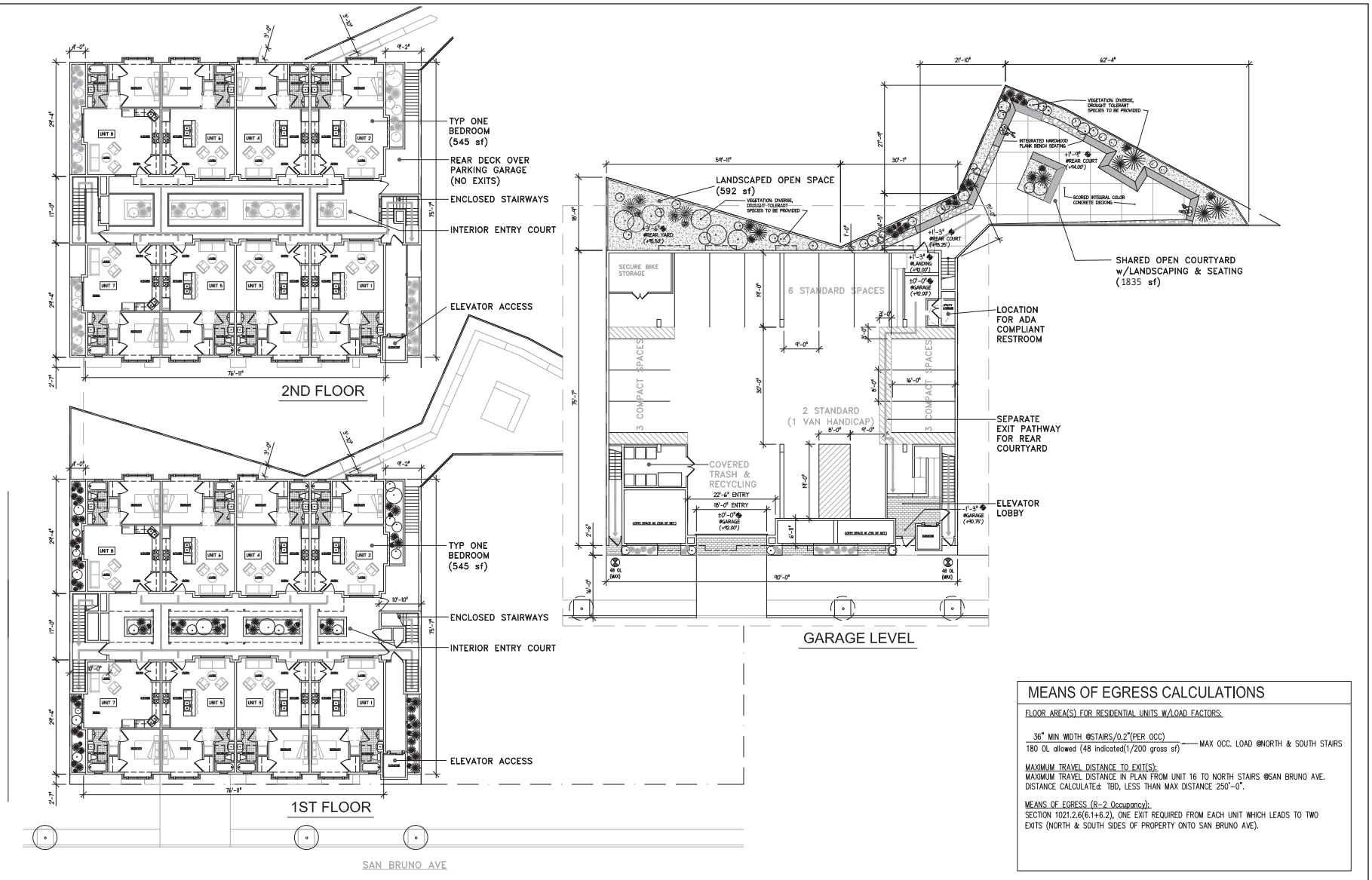
LSA

FIGURE 3b

36-50 San Bruno Avenue Project
Existing Site Conditions

SOURCE: LSA, 2017.

I:\BRI1701 36-50 San Bruno Ave\figures\Figures_3a-3b.ai (6/26/17)



MEANS OF EGRESS CALCULATIONS

FLOOR AREA(S) FOR RESIDENTIAL UNITS W/LOAD FACTORS:

36" MIN WIDTH @STAIRS/0.2"(PER OCC) —— MAX OCC. LOAD @NORTH & SOUTH STAIRS
180 OL allowed (48 indicated(1/200 gross sf)

MAXIMUM TRAVEL DISTANCE TO EXIT(S):
MAXIMUM TRAVEL DISTANCE IN PLAN FROM UNIT 16 TO NORTH STAIRS @SAN BRUNO AVE.
DISTANCE CALCULATEd: TBD, LESS THAN MAX DISTANCE 250'-0".

MEANS OF EGRESS (R-2 Occupancy):
SECTION 1021.2.6(6.1+6.2), ONE EXIT REQUIRED FROM EACH UNIT WHICH LEADS TO TWO EXITS (NORTH & SOUTH SIDES OF PROPERTY ONTO SAN BRUNO AVE).

LSA

FIGURE 4

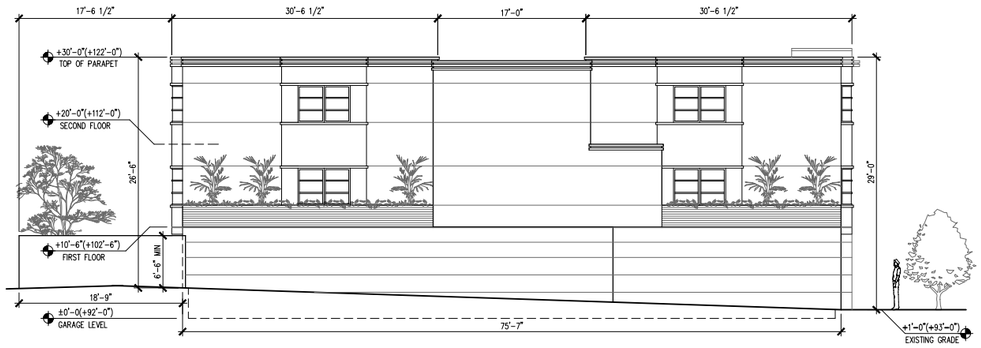
N

NOT TO SCALE

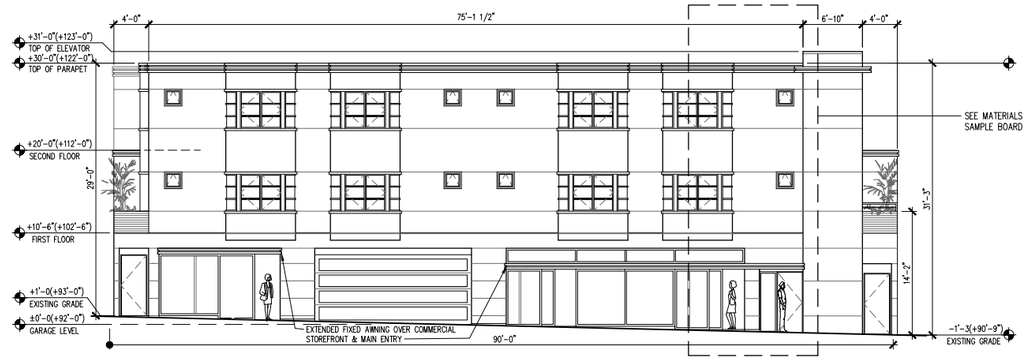
36-50 San Bruno Avenue Project
Conceptual Site Plan and Floor Plans

SOURCE: JT ARCHITECTURE + DESIGN, MARCH 2017.
I:\BRI1701 36-50 San Bruno Ave\figures\Fig_4.ai (7/10/17)

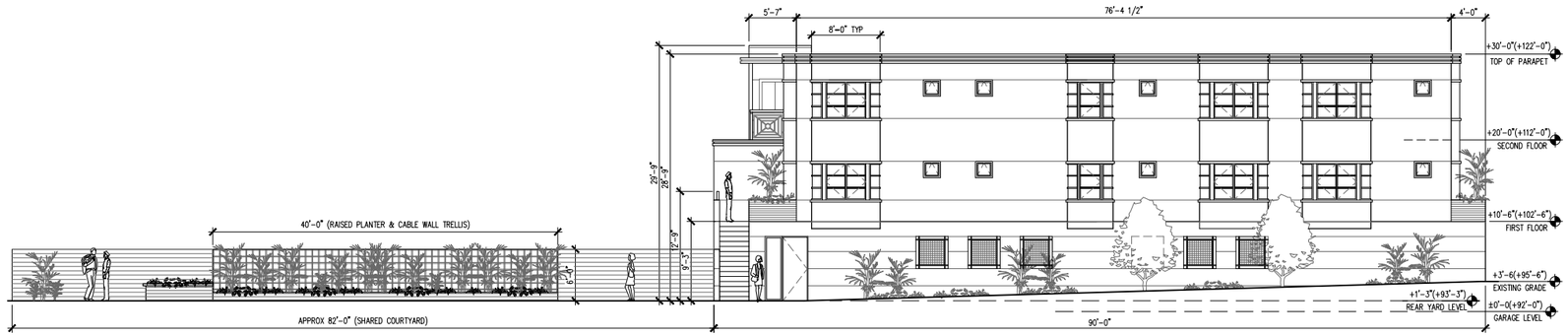
This page intentionally left blank.



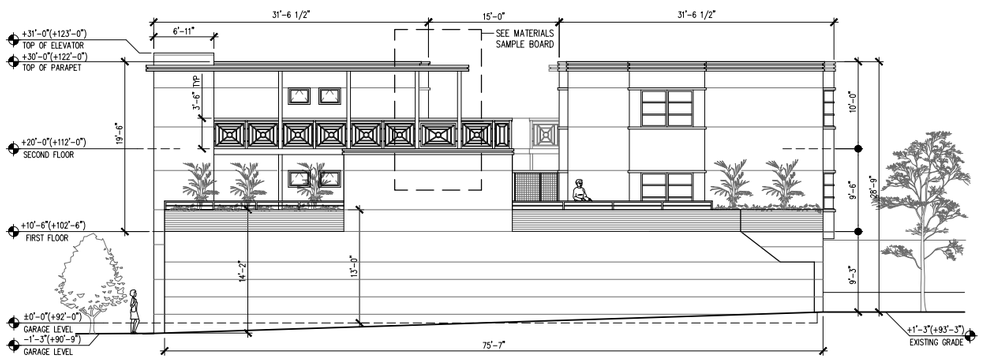
EXTERIOR NORTH ELEV



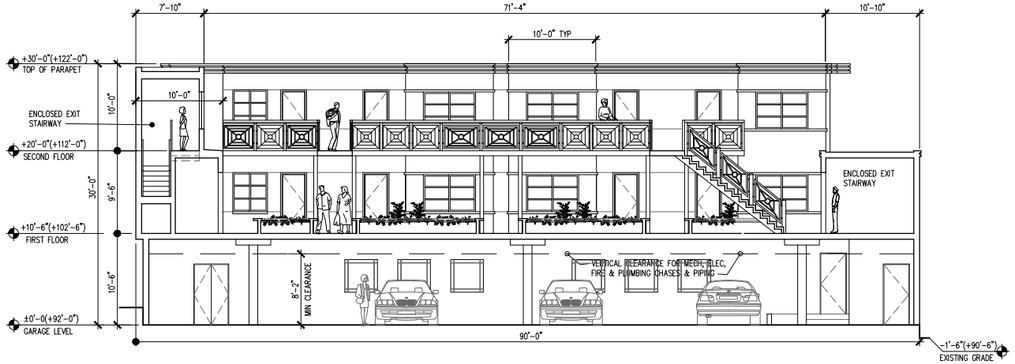
EXTERIOR STREET ELEV @SAN BRUNO



EXTERIOR REAR ELEV



EXTERIOR NORTH ELEV



INTERIOR COURT & GARAGE ELEV

LSA

FIGURE 5

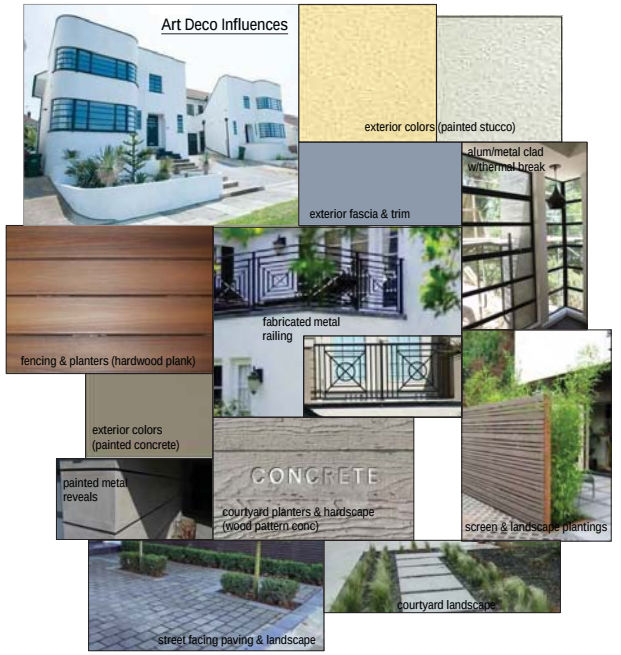
NOT TO SCALE

36-50 San Bruno Avenue Project
Conceptual Building Elevations

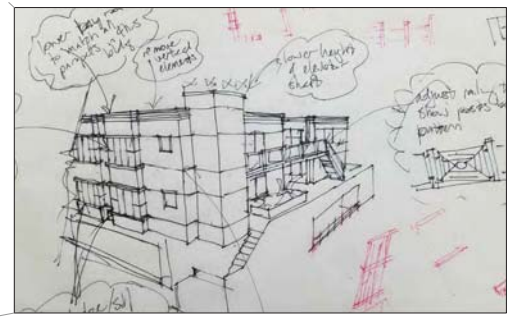
SOURCE: JT ARCHITECTURE + DESIGN, JULY 2017.
I:\BRI1701 36-50 San Bruno Ave\figures\Fig_5-11x17.ai (7/13/17)

This page intentionally left blank.

VIEW TOWARD SAN BRUNO UNITS IN SHARED REAR OPEN SPACE



MATERIALS & FEATURES



VIEW @SAN BRUNO AVE & CONCEPT SKETCH

LSA

FIGURE 6

NOT TO SCALE

36-50 San Bruno Avenue Project
Conceptual Renderings

SOURCE: JT ARCHITECTURE + DESIGN, JULY 2017.

I:\BRI1701 36-50 San Bruno Ave\figures\Fig_6.ai (7/10/17)

This page intentionally left blank.

a. Water. The Brisbane Water District, run by the City, provides water service to Central Brisbane. The City receives all of its water from the San Francisco Public Utilities Commission (SFPUC) through turnouts along the Crystal Springs pipelines. Under normal conditions, the water comes directly from the Hetch Hetchy Reservoir in Yosemite National Park. An 8-inch water line is located along San Bruno Avenue and would serve the project via a new connection.

b. Wastewater. The City provides wastewater service to residents and businesses in its service area. Wastewater generated at the project site would be collected via a 10-inch sanitary sewer line located along San Bruno Avenue and would serve the project site via a new connection.

c. Stormwater. The lot size is approximately 9,505 square feet, a majority of which is currently covered with the impervious parking lot. Development of the proposed project would result in a combination of new and replacement impervious surfaces on the site totaling approximately 8,400 square feet, including both the building and courtyard areas. The remaining approximately 1,105 square feet of the site would be landscaped and would be pervious.

Due to its size, the proposed project falls into a class of projects that, while not subject to Provision C.3 of the Municipal Regional Permit, is required to implement site design and source control measures, such as directing stormwater flows to landscaped areas on site, providing a roofed enclosure for refuse, and marking storm drains with "No Dumping! Flows to Bay." The project will also be required to use stormwater best management practices (BMPs) during construction. Additionally, an area has been designated along San Bruno Avenue, for a stormwater capture and treatment area, consistent with the City's General Plan green streets policy for new multi-family development.

d. Electricity and Natural Gas. Electricity and natural gas service to the site are provided by Pacific Gas and Electric (PG&E). An existing underground 4-inch gas line runs along San Bruno Avenue and would serve the project site via a connection. In addition, an overhead electric line runs along San Bruno Avenue and through the project site to a pole on the southeast border of the site, and can serve the project.

C. PROJECT APPROVALS

The City of Brisbane's zoning ordinance requires a conditional use permit for mixed-use developments, a design permit for the construction of any principal structure within the NCRO-2 Neighborhood Commercial District and grading review for projects with more than 50 cubic yards of exported material. The City of Brisbane has discretionary authority over these permit applications. This authority is granted by the City Council to the Planning Commission. Following approval of the use permit, design permit and grading permit, the project would be subject to City review and approval of a building permit prior to construction.

This page intentionally left blank.

EXEMPTIONS

Article 19 of the CEQA Guidelines includes, as required by Public Resources Code §21084, a list of classes of projects which have been determined not to have a significant effect on the environment and, as a result, are exempt from review under CEQA. This document has been prepared to serve as the basis for compliance with CEQA as it pertains to the proposed project, and to demonstrate that the project qualifies for a CEQA Exemption as an Infill Development Project, consistent with the provisions of CEQA Guidelines Sections 15332 and 15300.2. Specifically, the information provided herein shows that:

a. The project qualifies for an exemption under CEQA Guidelines Section 15332 (i.e., Class 32) and, as a result, would not have a significant effect on the environment;

b. The analysis shows there are no exceptions to qualifying for the infill exemption, as identified in CEQA Guidelines Section 15300.2.

CEQA Guidelines Section 15332 is applicable to projects characterized as infill development meeting the following conditions:

a. The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

b. The proposed development occurs within city limits on a project site of no more than 5 acres substantially surrounded by urban uses.

c. The project site has no value as habitat for endangered, rare or threatened species.

d. Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

e. The site can be adequately served by all required utilities and public services.

The analysis below provides substantial evidence that the project properly qualifies for an exemption under CEQA Guidelines Section 15332 (i.e., Class 32) and, as a result, would not have a significant effect on the environment. Additionally, the analysis shows there are no exceptions to qualifying for the categorical exemption, as identified in CEQA Guidelines Section 15300.2.

a. Criterion §15332(a): General Plan and Zoning Consistency. The proposed project is consistent with the applicable general plan designation and all applicable general plan policies, as well as with applicable zoning designations and regulations, as discussed below.

(1) General Plan. The project site has a Neighborhood Commercial/Retail/Office (NRCO) General Plan Land Use designation.[5] The General Plan intends for this site to consist of local retail and service uses, and public and semipublic facilities. Commercial recreation, residential, warehouse and distribution, and light industrial uses may be permitted conditionally in implementing zoning districts.[6]

[5] Brisbane, City of, 1994. *City of Brisbane General Plan.* June 21.

[6] Ibid.

The proposed project consists of 16 senior apartments, 464 square feet of commercial space, a 14-space parking garage, and associated open area. The proposed project meets the requirements of the local retail and service use designation that is permitted, and the residential use that is conditionally permitted in implementing zoning districts, as shown below, under the NRCO land use designation. Therefore, the proposed project would be consistent with the site's General Plan designation.

(2) Zoning. The project site is within the Downtown Brisbane Neighborhood Commercial (NRCO-2) district on the City of Brisbane Zoning Map.[7] Permitted uses within the NRCO-2 district include financial institutions, medical facilities, offices, personal services, restaurants, retail sales and rental, and home occupations. Dwelling units are conditionally permitted within the NRCO-2 district, only when part of a mixed-use project and when located above or behind nonresidential uses. Development standards within the NRCO-2 zoning district include no requirement for either a front setback or side setbacks, except when abutting a residential district. The required rear setback is 10 feet. The maximum height for structures is 35 feet when authorized by a design permit.[8]

As stated above, the proposed project would include both commercial and residential uses located above and behind the commercial use, and would therefore be conditionally permitted within the NRCO-2 district. The project applicant is seeking a concession under the State Density Bonus Law, Government Code §65915(b) and (d), to allow for a rear setback concession, for a 1 foot rear setback where 10 feet would otherwise be required, by providing at least 10 percent of the total units for lower income households, and at least 5 percent for very low income households. The proposed project would be approximately 31 feet in height at the tallest point, which would be authorized by the design permit. Therefore, the proposed project would be consistent with the site's zoning designation.

b. Criterion §15332(b): Project Location, Size and Context. The proposed project is located within the City limits on a project site of no more than 5 acres substantially surrounded by urban uses.

The project site is located within the incorporated limits of the City of Brisbane on a 0.22-acre site. The project site is currently developed with a vacant parking lot, and is surrounded by properties with urban land uses and paved public streets (see Figure 2). Therefore, the proposed project meets the criteria of CEQA Guidelines Section 15332(b).

c. Criterion §15332(c): Endangered, Rare or Threatened Species. The project site has no value as habitat for endangered, rare, or threatened species. The project site is developed and consists of a vacant parking lot, ruderal vegetation, and eight trees, which would be removed as a part of the proposed project. No existing buildings that could potentially provide habitat for special-status bats would be removed as a part of the proposed project.

Migratory birds, which are protected under the Migratory Bird Treaty Act, may use vegetation, including existing trees, on or near the project site for nesting. Implementation of the following condition of approval would ensure that potential impacts to nesting birds and raptors during construction would be less than significant:

[7] Brisbane, City of, 2003. *City of Brisbane Zoning Map.* July.

[8] Brisbane, City of, 2017. *Brisbane Municipal Code.* March 29.

- Prior to issuance of a Grading Permit, the project applicant shall provide written evidence to the Planning Director that, if feasible, all vegetation removal shall be undertaken during the non-breeding season (i.e., September 1 to January 31) to avoid direct impacts to nesting birds. If such work is scheduled during the breeding season, and per the direction of the Planning Director, the project applicant shall retain a qualified biologist or ornithologist to conduct a pre-construction survey to determine if any birds are nesting within the project site. The pre-construction survey shall be conducted within 15 days prior to the start of work from March through May (since there is a higher potential for birds to initiate nesting during this period), and within 30 days prior to start of work from June through July. If active nests are found during the survey, the biologist or ornithologist shall determine an appropriately sized buffer around the nest in which no work will be allowed until the young have successfully fledged. The size of the buffer with be determined by the biologist or ornithologist in consultation with the California Department of Fish and Wildlife, and would be based on the nesting species, its sensitivity to disturbance, and the expected types of disturbance.

For the reasons stated above, the proposed project adheres to the CEQA Guidelines §15332(c) criterion.

d. Criterion §15332(d): Traffic, Noise, Air Quality or Water Quality. Approval of the proposed project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Relative to CEQA Guidelines Section 15332(d), the following provides a discussion demonstrating that the proposed project would not result in a significant effect on traffic, noise, air quality and water quality, and that the project adheres to the CEQA Guidelines Section 15332(d) criterion.

(1) Traffic, Parking, Access and Circulation. The proposed project would construct 16 one bedroom senior housing apartments and 464 square feet of commercial space. Trip generation rates from the Institute of Transportation Engineer's (ITE) Trip Generation Manual, 9th Edition, were used to estimate the daily and peak hour trip generation for the proposed project. Table 1 below summarizes the trip generation for the proposed project. As presented in Table 1, the proposed project is expected to result in 75 daily trips, with 9 trips occurring during the AM peak hour and 20 trips occurring during the PM peak hour. Therefore, as identified in the Trip Generation Analysis prepared by Hexagon Transportation Consultants in 2017,[9] the new level of project-generated traffic would not be considered significant.

[9] Hexagon Transportation Consultants, Inc. 2017. *Trip Generation Analysis and Site Access and Circulation Review for the Proposed Mixed-Use Development at 36-50 San Bruno Avenue in Brisbane, California.*

Table 1: Trip Generation

Land Use[1]	Quantity	Daily Rate[2]	Daily Trips	AM Peak Hour				PM Peak Hour			
				Rate[2]	In	Out	Total	Rate[2]	In	Out	Total
Senior Apartments[3]	16 units	3.44	55	0.20	1	2	3	0.25	2	2	4
Commercial Space[4]	464 sf	42.7	20	0.96	4	2	6	3.71	8	8	16
Total			**75**	**-**	**5**	**4**	**9**	**-**	**10**	**10**	**20**

Notes:
sf = square feet

1 Trip generation rates are from the Institute of Transportation Engineers' (ITE) *Trip Generation Manual, 9th Edition (2012).*

2 The rates for the senior apartments are expressed in trips per dwelling unit and the rates for the commercial space are expressed in trips per 1,000 sf

3 Trip generation rates for the proposed senior apartments are based on "Senior Adult Housing – Attached" (Land Use Code 252). Average rates are used to estimate the trips that would be generated by the proposed senior apartments.

4 Trip generation rates for the proposed commercial space are based on "Shopping Center" (Land Use Code 820). The average rate is used to estimate the daily trips and the fitted curve equations are used to estimate the AM and PM peak hour trips that would be generated by the proposed commercial space.

Source: Hexagon Transportation Consultants, Inc. 2017.

The project site is located in the downtown Brisbane area and would be readily accessible to pedestrians, bicyclists, and transit users. The proposed project's driveway and ground floor parking garage would be adequate to serve the project's vehicular traffic. In addition, the project site is located on the west side of San Bruno Avenue, just north of the San Bruno Avenue with on-street parking on either side. Regional access to the project site is provided via US 101.

The proposed project would have a full-access 18-foot wide driveway that would provide access to a ground floor parking garage. The ground floor parking garage layout would consist of a rectangular maneuvering area surrounded by 14 parking spaces (see Figure 4). As determined in the Trip Generation Analysis, the maneuvering area would be approximately 56 feet by 30 feet, which would be adequate to allow vehicles to safely maneuver in and out of each space.

The project site is located in downtown Brisbane, which is considered a pedestrian area. There are sidewalks along the majority of the downtown streets and crosswalks are provided at all the intersections in the downtown area. In the immediate vicinity of the project, the stop-controlled intersection of San Bruno Avenue and Mariposa Street has crosswalks on each leg and accessible ramps on each corner. In addition, the five-legged, stop-controlled intersection of San Bruno Avenue/Visitacion Avenue/Old County Road and San Francisco Avenue, located approximately 200 feet north of the project site, has crosswalks on each leg and accessible ramps on each corner. Directly adjacent to the project, sidewalks are provided on both sides of San Bruno Avenue. The proposed project would have pedestrian entrances on the east side of the structure located directly adjacent to San Bruno Avenue.

There are limited bicycle facilities in the project vicinity, however, the downtown Brisbane streets have low traffic volumes which makes the roadways conducive to bicycle traffic.

Public transit service in the project vicinity is provided by Caltrain and SamTrans. The Caltrain and SamTrans routes and schedules are described in the Trip Generation Analysis, and would be readily accessible to transit users from the project site

Implementation of the proposed project would not substantially increase population resulting in a large number of vehicular trips, and therefore would not result in changes to the City's transportation and circulation system that could conflict with adopted policies, plans, or programs regarding transit,

bicycle, or pedestrian facilities. The proposed project would not otherwise decrease the performance or safety of such facilities, or cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity or alternative travel modes.

(2) Noise. A project will normally have a significant effect on the environment related to noise if it would substantially increase the ambient noise levels for adjoining areas or conflict with the adopted environmental plans and goals of the community in which it is located. Noise impacts can be described in three categories. The first is audible impacts that increase noise levels noticeable to humans. Audible increases in noise levels generally refer to a change of 3.0 decibels (dB) or greater since this level has been found to be barely perceptible in exterior environments. The second category, potentially audible, is the change in the noise level between 1.0 and 3.0 dB. This range of noise levels has been found to be noticeable only in laboratory environments. The last category is changes in noise levels of less than 1.0 dB, which are inaudible to the human ear. Only audible changes in existing ambient or background noise levels are considered potentially significant. For the purpose of this analysis, the proposed project creates a significant noise impact if the project-related noise increase at an existing sensitive receptor is greater than 3 dB and the resulting noise level is greater than the standards cited below or if the project-related increase in noise is greater than 5 A-weighted decibels (dBA).

Certain land uses are considered more sensitive to noise than others. Examples of these include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. The project site is located in an urban area within the City and is surrounded by a mix of uses, including residential and commercial uses. The closest sensitive receptors are adjacent existing residential uses located approximately 10 feet south of the proposed project.

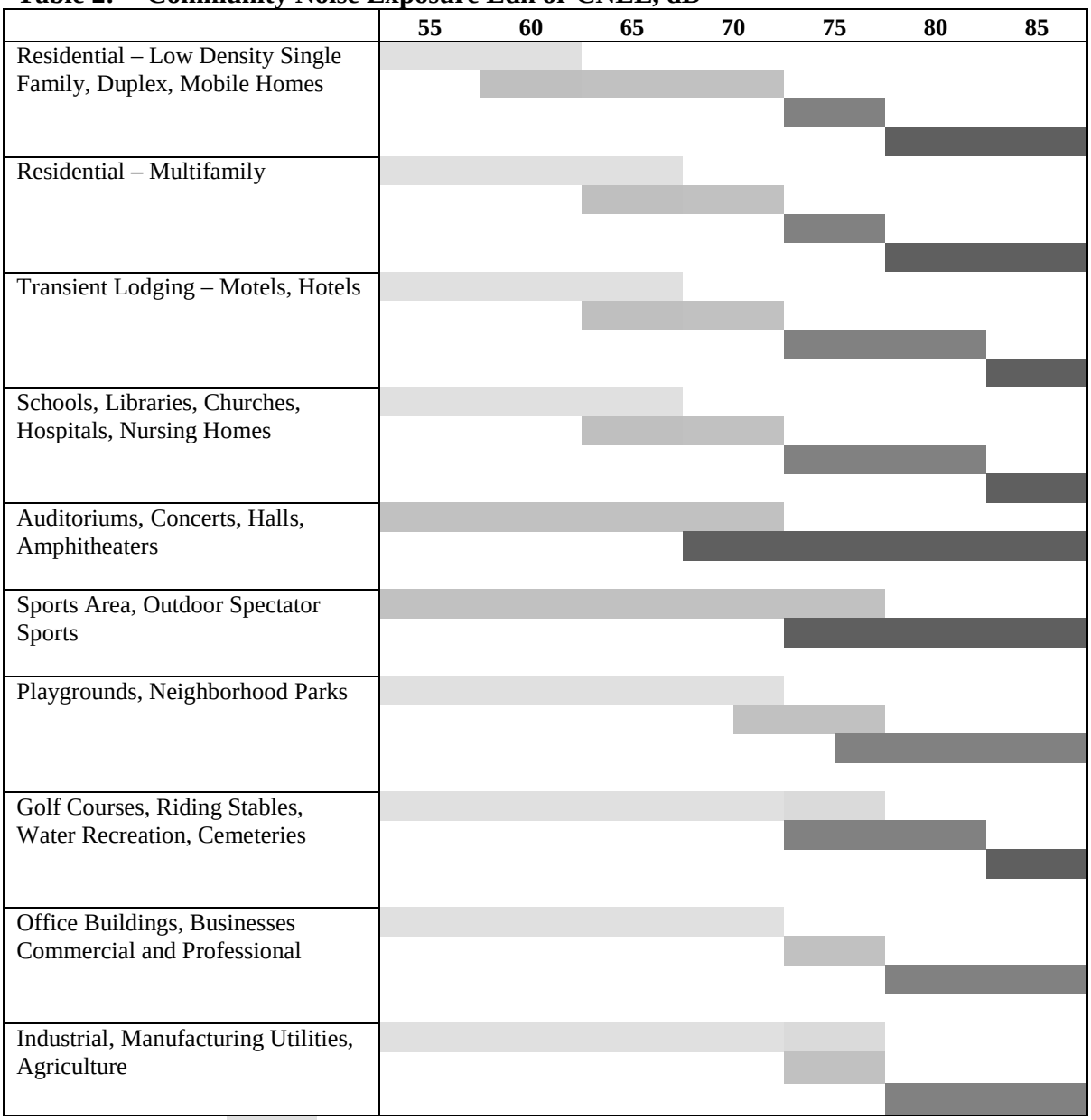
The primary existing noise sources contributing to ambient noise in the project area are traffic associated with San Bruno Avenue and other noise from motor vehicles generated by engine vibrations, the interaction between the tires and the road, and vehicle exhaust systems. Aircraft overflights are also a main source of noise in the project area. Ambient noise measurements taken in the project area indicate that noise levels in the project area are approximately 66 dBA L_{dn}.[10]

The adopted City of Brisbane General Plan addresses noise in the Noise Control chapter of the Municipal Code.[11] The General Plan contains policies that aim to protect the community from exposure to excessive noise. General Plan Policy 184 requires the use of the State Guidelines for land use compatibility to determine noise impacted uses. The State's land use compatibility guidelines for determining acceptable noise levels for specified land uses is shown in Table 2.

[10] Nigel Breitz Acoustics, 2005. *Acoustical Evaluation, Environmental Noise 1 San Bruno Avenue Brisbane, California*. November 14.

[11] Brisbane, City of, 2017. *City of Brisbane Municipal Code*, Chapter 8.28 Noise Control. February 2.

Table 2: Community Noise Exposure Ldn or CNEL, dB



Normally Acceptable	Specified land use is satisfactory, based upon the assumption that any building involved is of normal conventional construction, without any special noise insulation requirements.
Conditionally Acceptable	New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
Normally Unacceptable	New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
Clearly Unacceptable	New construction or development should generally not be undertaken.

Source: Office of Planning and Research, 2003.

The Brisbane Municipal Code states that no person shall cause, produce, suffer or allow to be produced by any machine, animal or device or any combination of the same, in any single-family residential zoning district, a noise level more than 10 dB above the local ambient level to any receiver for a cumulative period of more than 10 minutes in any hour, or a noise level more than 20 dB above the local ambient level to any receiver for a cumulative period of more than 3 minutes in any hour.

The Brisbane Municipal Code also highlights that construction shall be allowed only between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and 9:00 a.m. to 7:00 p.m. on weekends and holidays. Construction, alteration or repair activities which are authorized by a valid City permit shall be allowed if they meet at least one of the following noise limitations:

- No individual piece of equipment shall produce a noise level exceeding 83 dBA at a distance of 25 feet from the source thereof. If the device or other source is housed within a structure on the property, the measurement shall be made outside the structure, but at a distance as close to the equipment or source as possible.
- The noise level at any point outside of the property plane of the project shall not exceed 86 dBA.

Exposure to Excessive Noise Levels. The proposed project is adjacent to residential uses. Project construction would result in short-term noise adjacent to these land uses. Maximum construction noise would be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The duration of noise impacts generally would be from one day to several days depending on the phase of construction. As identified above, construction noise is permitted by the City's Municipal Code when activities occur between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and 9:00 a.m. to 7:00 p.m. on weekends and holidays. The City's Municipal Code also sets allowable construction noise levels from construction equipment, as specified under the Noise Ordinance as 83 dBA at 25 feet. The proposed project would comply with these hours and would implement best management practices during construction to reduce noise levels to the extent feasible. With compliance to the Municipal Code standards, the proposed project would feasibly attain acceptable noise levels during construction. Therefore, this impact would be considered less than significant.

The proposed project would develop residential uses in a developed area in the City of Brisbane. Operational noise can be categorized as mobile source noise and stationary source noise. Mobile source noise would be attributable to the additional trips that would be a result of the proposed project. Stationary source noise includes noise generated by the residential uses of the site, such as heating, ventilation, and air conditioning (HVAC) equipment.

Motor vehicles are the dominant noise source in the project vicinity. The amount of noise varies according to many factors, such as volume of traffic, vehicle mix (percentage of cars and trucks), average traffic speed, and distance from the observer. Implementation of the proposed project would result in new daily trips on local roadways in the project site vicinity. The project would generate an estimated 75 daily vehicle trips, with 9 trips occurring during the AM peak hour and 20 trips occurring during the PM peak hour. Project trips would represent a small fraction of the overall roadway traffic volumes. A characteristic of sound is that a doubling of a noise source is required in order to result in a perceptible (3 dBA or greater) increase in the resulting noise level. Project daily trips would not result in a doubling of traffic volumes along any roadway segment in the project vicinity, and therefore would not result in a perceptible increase in traffic noise levels at receptors in the project vicinity.

The nearest off-site sensitive receptors in the vicinity of the project are the residences located adjacent to the project site boundary. Implementation of the proposed project would generate minimal on-site stationary noise, primarily in the form of HVAC equipment.

HVAC equipment is often mounted on rooftops, located on the ground, or located within mechanical rooms. The noise sources could take the form of fans, pumps, air compressors, chillers, or cooling towers. HVAC operations associated with the project would be required to meet the City's noise standards.

Land Use Compatibility. The dominant source of noise in the project vicinity is traffic noise on San Bruno Avenue. As identified above, noise levels in the project site are approximately 66 dBA $L_{dn.}$

As identified above, the City's General Plan requires the use of the State Guidelines for land use compatibility to determine noise impacts. The State sets forth normally acceptable noise level standards for land use compatibility and interior noise exposure for new development. The normally acceptable exterior noise level for multi-family residential units is 65 dBA L_{dn}. Noise levels of 65 to 75 dBA L_{dn} are considered conditionally acceptable when a detailed analysis of noise reduction requirements and noise insulation features are included in the design to meet the interior noise standard. The normally acceptable interior noise level for residential units is 45 dBA L_{dn}.

Based on the EPA's Protective Noise Levels,[12] with a combination of walls, doors, and windows, standard construction for Northern California residential buildings (STC-24 to STC-28) would provide more than 25 dBA in exterior-to-interior noise reduction with windows closed and 15 dBA or more with windows open. The project's proposed ventilation system would reduce noise levels for residents with windows closed and would meet the State's normally acceptable interior noise level criterion of 45 dBA (i.e., 66 dBA – 25 dBA = 41 dBA). Therefore, the project would meet the State's land use compatibility standards.

Exposure to Excessive Ground-borne Vibration. Common sources of ground-borne vibration and noise include trains and construction activities such as blasting, pile driving and operating heavy earthmoving equipment. Construction of the proposed project would involve grading, site preparation, and construction activities but would not involve the use of construction equipment that would result in substantial ground-borne vibration or ground-borne noise on properties adjacent to the project site. No pile driving, blasting, or significant grading activities are proposed. Furthermore, operation of the proposed project would not generate substantial ground-borne noise and vibration. Therefore, the project would not result in the exposure of persons to or generation of excessive ground-borne noise and vibration.

Aircraft Noise Impacts. The proposed project is not located within 2 miles of a public or public use airport. The San Francisco International Airport is the closest airport and is located approximately 6 miles south of the project site. Aircraft noise is occasionally audible at the project site; however, no portion of the project site lies within the 65 dBA CNEL noise contours of any public airport nor does any portion of the project site lie within 2 miles of any private airfield or

[12] Environmental Protection Agency, 1978. *Protective Noise Levels, Condensed Version of EPA Levels Document*. November.

heliport. Therefore, the proposed project would not result in the exposure of sensitive receptors to excessive noise levels from aircraft noise sources.

(3) Air Quality. The proposed project is located in the City of Brisbane, and is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD), which regulates air quality in the San Francisco Bay Area. In Brisbane, and the rest of the air basin, exceedances of air quality standards occur primarily during meteorological conditions conducive to high pollution levels, such as cold, windless winter nights or hot, sunny summer afternoons.

Within the BAAQMD, ambient air quality standards for ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter (PM_{10}, $PM_{2.5}$), and lead (Pb) have been set by both the State of California and the federal government. The State has also set standards for sulfate and visibility. The BAAQMD is under State non-attainment status for ozone and particulate matter standards. The BAAQMD is classified as non-attainment for the federal ozone 8-hour standard and non-attainment for the federal $PM_{2.5}$ 24-hour standard.

Consistency with Applicable Air Quality Plans. The applicable air quality plan is the BAAQMD's 2017 Clean Air Plan, which was adopted on April 19, 2017. The 2017 Clean Air Plan/Regional Climate Protection Strategy serves as a roadmap for the BAAQMD to reduce air pollution and protect public health and the global climate. The 2017 Clean Air Plan also includes measures and programs to reduce emissions of fine particulates and toxic air contaminants. In addition, the Regional Climate Protection Strategy is included in the 2017 Clean Air Plan, which identifies potential rules, control measures, and strategies that the BAAQMD can pursue to reduce greenhouse gases throughout the Bay Area.

Consistency with the 2017 Clean Air Plan is determined by whether or not the proposed project would result in significant and unavoidable air quality impacts or hinder implementation of control measures (e.g., excessive parking or preclude extension of transit lane or bicycle path). As indicated in the analysis that follows, the proposed project would not result in significant operational and construction-period emissions. Therefore, the proposed project supports the goals of the Clean Air Plan and would not conflict with any of the control measures identified in the plan as designed to bring the region into attainment. Additionally, the proposed project would not substantially increase the population, vehicle trips, or vehicle miles traveled. The proposed project would not hinder the region from attaining the goals outlined in the Clean Air Plan. Therefore, the proposed project would not hinder or disrupt implementation of any control measures from the Clean Air Plan.

Violate Air Quality Standards. During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by grading, hauling, and building activities. Emissions from construction equipment are also anticipated and would include CO, nitrogen oxides (NO_x), reactive organic gases (ROG), directly-emitted particulate matter ($PM_{2.5}$ and PM_{10}), and toxic air contaminants (TACs) such as diesel exhaust particulate matter.

The BAAQMD has developed screening criteria to provide lead agencies with a conservative indication of whether a proposed project would result in potentially significant air quality impacts. If all of the screening criteria are met, then the lead agency would not need to perform a detailed air quality assessment of the proposed project's emissions. These screening levels are generally representative of new development without any form of mitigation measures taken into consideration.

In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

Table 3 shows a comparison of the project to the applicable construction-related criteria air pollutant screening levels.

Table 3: Comparison of Project to BAAQMD Construction-Related Criteria Pollutant Screening Levels

Project Land Use	Project Size	BAAQMD Land Use Type	BAAQMD Screening Size	Ratio (Project/ Screening Size)
1 Bedroom Apartments	16 units	Apartment, Low-Rise	220 units	0.072
Parking Garage	5,650 square feet	Warehouse	259,000 square feet	0.022
Commercial	464 square feet	Convenience Market (24-hour)	277,000 square feet	0.002
Landscape Yard and Courts	3,857 square feet (0.09 acres)	City Park	67 acres	0.001
Total				**0.097**

Source: LSA Associates, 2017 and BAAQMD, 2017.

As identified in the Air Quality Analysis prepared by Ramboll Environ in 2016,[13] the ratio of the project size to the BAAQMD screening size was calculated for each land use and then was summed across all project land uses to evaluate the impact of the project. A ratio of less than one indicates that the project's air quality impacts are expected to be less than the BAAQMD CEQA significance thresholds. The Air Quality Analysis did not identify construction-related screening levels; however, as identified in Table 3 above, the ratios for construction-related criteria pollutants is 0.097, which indicates that the project's construction-related air quality impacts are expected to be less than BAAQMD CEQA significance thresholds. In addition, the project would include a small amount of grading which would involve minimal soil off-haul and would not exceed the BAAQMD's significance thresholds. Therefore, the project would not result in a significant air quality impact related to project construction.

Long-term air emission impacts are those associated with area sources and mobile sources related to the proposed project. In addition to the short-term construction emissions, the project would also generate long-term air emissions, such as those associated with changes in permanent use of the project sites. These long-term emissions are primarily mobile source emissions that would result from vehicle trips associated with the proposed project. Area sources, such as natural gas heaters, landscape equipment, and use of consumer products, would also result in pollutant emissions.

As discussed above, the BAAQMD has developed screening criteria to provide lead agencies with a conservative indication of whether the proposed project would result in potentially significant air quality impacts. If all of the screening criteria are met by a proposed project, then the lead agency would not need to perform a detailed air quality assessment of the proposed project's emissions.

[13] Ramboll Environ, 2016. *Air Quality Analysis for Operation of 30-50 San Bruno Avenue, Brisbane, California*. November 30.

Table 4 shows a comparison of the project to the applicable operational-related criteria air pollutant screening levels.

Table 4: Comparison of Project to BAAQMD Operational-Related Criteria Pollutant Screening Levels

Project Land Use	Project Size	BAAQMD Land Use Type	BAAQMD Screening Size	Ratio (Project/ Screening Size)
1 Bedroom Apartments	16 units	Apartment, Low-Rise	451 units	0.035
Parking Garage	5,650 square feet	Warehouse	864,000 square feet	0.007
Commercial	464 square feet	Convenience Market (24-hour)	5,000 square feet	0.093
Landscape Yard and Courts	3,857 square feet (0.09 acres)	City Park	2,613 acres	0.000
Total				**0.135**

Source: Ramboll Environ, 2016 and BAAQMD, 2017.

As discussed above, the ratio of the project size to the BAAQMD screening size was calculated for each land use and then was summed across all project land uses to evaluate the impact of the project.[14] A ratio of less than one indicates that the project's air quality impacts are expected to be less than the BAAQMD CEQA significance thresholds. The Air Quality Analysis by Ramboll assumed there would be 230 square feet of commercial space and 3,587 square feet of landscaping, including the 1,428 square foot courtyard above the ground floor. The revised project includes 464 square feet of commercial and 3,855 square feet of landscaping. As identified in Table 4 above, the ratios for operational-related criteria pollutants is 0.135, which indicates that the project's operational-related air quality impacts are expected to be less than the BAAQMD CEQA significance thresholds. Therefore, the project would not result in a significant air quality impact related to project operations.

The BAAQMD has established a screening methodology that provides a conservative indication of whether the implementation of a proposed project would result in significant CO emissions. According to the BAAQMD CEQA Guidelines, a proposed project would result in a less-than significant impact to localized CO concentrations if the following screening criteria are met:

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

[14] Ibid.

Implementation of the proposed project would not conflict with the San Mateo County Transportation Authority for designated roads or highways, a regional transportation plan, or other agency plans. The project site is not located in an area where vertical or horizontal mixing of air is substantially limited. In addition, the proposed project would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour and would not result in localized CO concentrations that exceed State or federal standards.

Cumulative Impacts. CEQA defines a cumulative impact as two or more individual effects, which when considered together, are considerable or which compound or increase other environmental impacts. Therefore, if annual emissions of construction- or operational-related criteria air pollutants exceed any applicable threshold established by the BAAQMD, the proposed project would result in a cumulatively significant impact. As discussed above, no exceedance of BAAQMD emission thresholds would occur as a result of construction or operation of the proposed project. The proposed project's construction and operational emissions of criteria pollutants are estimated to be well below the emissions threshold established for the region. Therefore, the project would not result in a cumulatively considerable contribution to regional air quality impacts.

Sensitive Receptors. Sensitive receptors are defined as residential uses, schools, daycare centers, nursing homes, and medical centers. Individuals particularly vulnerable to diesel particulate matter are children, whose lung tissue is still developing, and the elderly, who may have serious health problems that can be aggravated by exposure to diesel particulate matter. Exposure from diesel exhaust associated with construction activity contributes to both cancer and chronic non-cancer health risks.

According to the BAAQMD, a project would result in a significant impact if it would: individually expose sensitive receptors to TACs resulting in an increased cancer risk greater than 10.0 in one million, increased non-cancer risk of greater than 1.0 on the hazard index (chronic or acute), or an annual average ambient $PM_{2.5}$ increase greater than 0.3 micrograms per cubic meter ($\mu g/m^3$). A significant cumulative impact would occur if the project in combination with other projects located within a 1,000-foot radius of the project site would expose sensitive receptors to TACs resulting in an increased cancer risk greater than 100.0 in one million, an increased non-cancer risk of greater than 10.0 on the hazard index (chronic), or an ambient $PM_{2.5}$ increase greater than 0.8 $\mu g/m^3$ on an annual average basis. Impacts from substantial pollutant concentrations are discussed below.

As described above, construction of the proposed project may expose surrounding sensitive receptors to airborne particulates, as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). As indicated in Table 3, project construction emissions would be below the BAAQMD significance thresholds and would only occur for a limited duration, sensitive receptors are not expected to be exposed to substantial pollutant concentrations during project construction.

The Air Quality Analysis prepared for the project evaluated the health risk impacts due to traffic associated with the project, utilizing the BAAQMD Roadway Screening Analysis Calculator. The results of the analysis are presented in Table 5 below.

Table 5: Comparison of Project Traffic Impacts to BAAQMD Operational-Related $PM_{2.5}$ and Cancer Risk Thresholds

County	Roadway Direction	Side of Roadway	Distance from Roadway (feet)	Annual Average Daily Traffic	$PM_{2.5}$ Average ($\mu g/m^3$)	Cancer Risk (per million)
San Mateo	North/South	East	10	315	0.0075	0.44
		West	10	315	0.0037	0.22
	East/West	North	10	315	0.0055	0.34
		South	10	315	0.0056	0.32
BAAQMD CEQA Threshold					**>0.3**	**>10.0**

Source: Ramboll Environ, 2016.

As indicated in Table 5, the estimated $PM_{2.5}$ concentration and cancer risk associated with the project are expected to be below the BAAQMD CEQA thresholds. Therefore, the project would not expose future residents to substantial pollutant concentrations.

Odors. During project construction, some odors may be present due to diesel exhaust. However, these odors would be temporary and limited to the construction period. The proposed project would not include any activities or operations that would generate objectionable odors and once operational, the project would not be a source of odors. Therefore, the proposed project would not create objectionable odors affecting a substantial number of people.

(4) Greenhouse Gas Emissions. Greenhouse gases (GHGs) are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO_2);
- Methane (CH_4);
- Nitrous oxide (N_2O);
- Hydrofluorocarbons (HFCs);
- Perfluorocarbons (PFCs); and
- Sulfur Hexafluoride (SF_6).

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, believed to be causing global warming. While manmade GHGs include naturally-occurring GHGs such as CO_2, methane, and N_2O, some gases, like HFCs, PFCs, and SF_6 are completely new to the atmosphere.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of Global Warming Potential (GWP), a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG. The definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e).

Generate Greenhouse Gas Emissions. Construction activities associated with the proposed project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The BAAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, because the proposed project's operational-related GHG emissions are expected to be less than BAAQMD CEQA significance thresholds, project construction impacts associated with GHG emissions are also not expected to be significant.

Long-term operation of the proposed project would generate GHG emissions from area and mobile sources, and indirect emissions from sources associated with energy consumption. Mobile-source emitters of GHGs would include project-generated vehicle trips associated with visitor trips to the project site. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site, and other sources.

Table 6 shows a comparison of the project to the applicable operational-related GHG air pollutant screening levels.

Table 6: Comparison of Project to BAAQMD Operational-Related GHG Screening Levels

Project Land Use	Project Size	BAAQMD Land Use Type	BAAQMD GHG Screening Size	Ratio (Project/ Screening Size)
1 Bedroom Apartments	16 units	Apartment, Low-Rise	78 units	0.205
Parking Garage	5,650 square feet	Warehouse	64,000 square feet	0.088
Commercial	464 square feet	Convenience Market (24-hour)	1,000 square feet	0.464
Landscape Yard and Courts	3,857 square feet (0.09 acres)	City Park	600 acres	0.0001
Total				**0.757**

Source: Ramboll Environ, 2016 and BAAQMD, 2017.

As discussed above, the ratio of the project size to the BAAQMD screening size was calculated for each land use and then was summed across all project land uses to evaluate the impact of the project.[15] A ratio of less than one indicates that the project's GHG impacts are expected to be less than BAAQMD CEQA significance thresholds. The analysis in the Air Quality Analysis assumed there would be 230 square feet of commercial space and 3,587 square feet of landscaping. The revised project proposes 464 square feet of commercial and 3,855 square feet of landscaping. As identified in Table 6 above, the ratios for operational-related criteria pollutants is 0.757, which indicates that the project's operational-related GHG impacts are expected to be less than BAAQMD CEQA significance thresholds. Therefore, the project would not result in a significant impact related to GHG emissions.

Consistency with Greenhouse Gas Reduction Plans. The City of Brisbane regulates GHG emissions through implementation of the City's Climate Action Plan (CAP), adopted September 17, 2015.[16] The primary goal of the CAP is to reduce the City of Brisbane's GHG emissions to comply with Assembly Bill (AB) 32. The CAP outlines specific actions, called "measures" that seek to reduce Brisbane's GHG emissions. The measures in the CAP relate to energy, water use, solid waste, and road emissions/transportation. These measures are assumed to lead to specific, quantifiable reductions of GHG emissions.

The City of Brisbane CAP includes an inventory of GHG emissions from a wide variety of sources by sector. In the base year of 2005, the City of Brisbane emitted approximately 70,946 metric tons CO_2e from the residential, commercial, industrial, transportation, waste, and municipal sectors. The largest percentage of GHG emissions are from the transportation sector, which accounts for approximately 51 percent, followed by the commercial/industrial sector and the solid waste sector, which account for approximately 33 percent and 8 percent respectively. The residential sector accounts for approximately 8 percent of citywide GHG emissions.

Based on the 2005 emissions inventories, the City projected a forecast of future emissions for the year 2020. The emission forecast represents a "business-as-usual" prediction of how GHG emissions would grow in the absence of a GHG policy. The business-as-usual GHG emissions for the year 2020 were projected to be approximately 74,180 metric tons CO_2e, which is an increase of 4.6 percent over the 2005 emission inventory. The City's reduction goal is to reduce community-wide GHG emissions by at least 15 percent by 2020, which is a reduction of 13,876 metric tons of CO_2e.

Consistency with the CAP can be determined if the project would support the goals of the CAP, include applicable control measures, and would not disrupt or hinder implementation of any control measures from the CAP. The project's consistency with applicable objectives is described in Table 7 below.

[15] Ibid.

[16] Brisbane, City of, 2015. *City of Brisbane Climate Action Plan*. September 17.

Table 7: Project Compliance with Brisbane CAP

Climate Action Plan Measure	Project Compliance
Energy Measures	
EC2: Residential green building ordinance. The City implemented a Residential Green Building Ordinance that requires new single family dwellings in developments with over 20 housing units to achieve a "green home" rating on the New Home Green Points Checklist.	***Not Applicable.*** This measure is not applicable to the proposed project because the project would include 16 apartment units. However, the proposed project would comply with the latest Title 24 standards for building construction. Therefore, the proposed project would be in compliance with this measure.
EC9: Voluntary Residential Energy Disclosure. Voluntary disclosure of energy use at time of home sale.	***To Be Demonstrated.*** Current plans for the project do not provide sufficient detail to demonstrate if the project would involve voluntary disclosure of energy use at time of occupancy.
Community-wide Measures	
WC1: Set higher diversion rate goal. The City will promote residential waste reduction and continue offering food scrap pickup through Waste Management. Additionally, the City will encourage community exchange of used items.	***To Be Demonstrated.*** Current plans for the project do not provide sufficient detail to demonstrate the implementation of residential waste reductions. Construction plans would be reviewed for the incorporation of residential waste reductions prior to the issuance of building permits.
Water Measures	
EW1: Water conservation incentives. The City adopted the update of the Brisbane Water Conservation in Landscaping Ordinance in 2016 and will continue to apply the ordinance. The City will continue to promote existing and/or new rebates for water efficient appliances and fixtures through BAWSCA and promote CaliforniaFIRST water efficiency project financing for drip irrigation and artificial turf. The City will promote information/programs for water efficient landscaping and consider providing incentives for drought-resistant plants. The City has promoted use of rain barrels.	***Consistent.*** The project would be required to comply with the City's Water Conservation in Landscaping Ordinances.

Source: LSA Associates, 2017 and City of Brisbane, 2015

As discussed in Table 7 above, the proposed project would be generally consistent with applicable CAP actions. In addition, the proposed project would not result in a substantial increase in GHG emissions and would not generate emissions that would exceed the project-level significance criteria established by the BAAQMD. Therefore, the proposed project would not conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions, and this impact would be less than significant.

(5) Water Quality. The City, as a participant in the National Pollution Discharge Elimination System (NPDES) program, is committed to reducing the amount of pollutants entering waterways.

Construction Related Water Quality Impacts. The proposed project would include the construction of 16 senior apartment units, a 14-space parking garage, 464 square feet of commercial space, and associated landscaping on a 0.22-acre site. The proposed project would not involve substantial demolition or grading activities. Compliance with General Plan Program 133b would require the project applicant to exercise strict controls over dirt and construction debris potentially entering waterways. Additionally, complying with construction Best Management Practices identified in the San Mateo Countywide Water Pollution Prevention Program would ensure that water quality impacts during construction would be less than significant.

Operation Period Water Quality Impacts. The proposed project would include the construction of 16 senior apartment units, a 14-space parking garage, 464 square feet of commercial space, and associated landscaping on a 0.22-acre site. The proposed project would result in a decrease in impervious surface area, by adding landscaping to the project site. Additionally, the proposed project would include point source control measures, as identified in Section 4.c, Stormwater, of the Project Description. Therefore, the proposed project would continue to minimize pollutant runoff from the project site, and water quality impacts during operation would be less than significant.

Groundwater. Groundwater within the project area is not used for water supply but is considered by the RWQCB as a potential resource. The proposed project would not result in an increase in impervious surface area from its existing condition and drainage is not expected to change. Therefore, groundwater recharge is not expected to be impacted as a result of the proposed project.

Stormwater Collection. The proposed project would not increase the impervious surface area of the project site and therefore would not result in an increase in additional runoff that would exceed existing stormwater facilities or cause flooding of receiving waters. Additionally, the proposed project would implement site design and source control measures, such as directing stormwater flows to landscaped areas on site, to reduce stormwater runoff.

Flooding. The project site is not located within a 100- or 500-year floodplain.[17] Additionally, the project site is located in a moderately low susceptibility area for tsunami and seiche.[18]

e. Criterion §15332(e): Utilities and Public Services. The site can be adequately served by all required utilities and public services.

The project is situated in an urban area already served by all necessary municipal utilities (i.e., stormwater, water, wastewater, solid waste) and public services (i.e., police, fire, schools). The following analysis reviews whether the project can, as required by CEQA Guidelines §15332(e) be "adequately served by all required utilities and public services."

(1) Stormwater. The City of Brisbane Public Works Department is responsible for the engineering and maintenance of the stormwater drainage system for the project site and the surrounding area. Stormwater runoff from the project is channeled into storm drains located along

[17] Federal Emergency Management Agency, 2012. Flood Rate Insurance Map. San Mateo County, California and Incorporated Areas, Panel 42 of 510. October 16.

[18] Brisbane, City of, 1994, op. cit.

San Bruno Avenue, which discharges into either Brisbane Lagoon or the San Francisco Bay. Additionally, the City participates in the San Mateo Countywide Stormwater Pollution Prevention Program, which implements the NPDES program throughout the county.

Overall stormwater runoff volume from the project site would decrease since the site is comprised almost entirely of impervious surfaces, and the proposed project would result in the construction of a three-story building that includes 1,125 square feet of pervious surfaces. Additionally, as mentioned above in Section 4.c, Stormwater, of the Project Description, the proposed project would include site design and source control measures to reduce stormwater runoff. Therefore, there would be no significant increase in contributions to the municipal stormwater system once the proposed project is operational.

(2) Water. The project site is served by existing water supplies and distribution systems operated and managed by the Brisbane Water District. As mentioned previously, water in Brisbane is supplied by the SFPUC. The Brisbane Water District provides water to Central Brisbane, including the project site, Sierra Point, and the Baylands. The project site would be served by an 8-inch water line that is located along San Bruno Avenue, via a new connection. The proposed project would result in an increase in water usage, however this increase would be marginal and is accounted for within the SFPUC service area. The SFPUC projects that the City's demand for water will increase from 0.98 million gallons per day (mgd) to 1.07 mgd by the year 2035, which is approximately one half of one percent of the projected total demand of 196.5 mgd in 2035 for the entire SFPUC wholesale service area.[19] Additionally, General Plan Program 138a requires the use of water conserving features in new construction, and 138b encourages the use of water conserving landscape and irrigation systems.[20]

For the reasons stated above, and with compliance with General Plan policies, there is sufficient water to serve the proposed project.

(3) Wastewater. The City provides sanitary sewer services to residents and businesses in its service area. The sewer collection system consists of more than 80,000 feet of laterals, mains, trunks, and 20,000 feet of force mains ranging in size from 6 to 24 inches in diameter. A series of gravity collection system mains and smaller pumping stations convey most of the wastewater flow to the Valley Drive Pump Station. Wastewater is then delivered to the 78-inch diameter City of San Francisco interceptor and ultimately conveyed to the Southeast Treatment Plant (SEP) in San Francisco. On average the SEP treats approximately 60 mgd of wastewater and handles 160 wet tons of biosolids each day. The SEP has a wet weather capacity of approximately 250 mgd.

The project site would be served via a new connection to an existing 10-inch sanitary sewer line located along San Bruno Avenue. The proposed project would include a minor increase in the residential population of the project site. However, this increase would be minimal and would not substantially change the City's wastewater treatment demand projections or require the expansion of wastewater facilities. Additionally, the SEP is currently undergoing operational improvements

[19] The San Francisco Public Utilities Commission, 2011. *2010 Urban Water Management Plan*. June.

[20] Brisbane, City of, 1994, op. cit.

including a new biosolids digester facility, a new headworks facility, and upgrades to oxygen and influent pumps. Therefore, there is sufficient wastewater treatment capacity to serve the project.

(4) Solid Waste. The South San Francisco Scavenger Company (SSFSC) provides solid waste collection within the City and transports waste to the Blue Line Transfer and Materials Recovery Facility (MRF). The Blue Line MRF collects, receives processes, recycles, or transfers an average of 220,000 tons of waste per year. Solid waste is transferred from the Blue Line MRF to the Ox Mountain Sanitary Landfill (OMSL). As of December 2015, the OMSL had approximately 22 million cubic yards of remaining capacity. The proposed project would produce a minimal amount of solid waste, and would not require the expansion or construction of new solid waste facilities. Therefore, the proposed project would have a less-than-significant impact related to solid waste.

(5) Police Services. Law enforcement is provided by the City of Brisbane Police Department (BPD). The proposed project would result in an increase in the residential population of the project site. Additionally, the proposed project would minimally increase the daytime population due to the 464 square feet of commercial space. The project site is in an area already served by the BPD. It is not anticipated that the project would result in the need for any new physical facilities to maintain acceptable service ratios, response time, or other performance objectives. Therefore, police service is adequate to serve the proposed project.

(6) Fire Protection Services. The Brisbane Fire Department (BFD) is a part of the North County Fire Authority (NCFA), which provides fire and emergency services to the residents of the City of Brisbane, which includes the project site. The NCFA handles all fire, rescue, emergency medical and special operations emergency incidents, as well as non-emergency calls for service and assistance. Emergency medical services transportation is provided by American Medical Response, a private ambulance service contracted by the NCFA. Every day of the year, at least three firefighters are assigned to eight fire engines and one aerial ladder truck, and two are assigned to an ambulance. In addition, two battalion chiefs and one deputy fire chief are on duty at all times to lead and supervise emergency personnel. The BFD is located at 3445 Bayshore Boulevard in Brisbane, approximately 0.5 miles from the project site. The project site is in an area already served by the BFD, and would not impact the NCFA's response time standard of responding within 7 minutes. The proposed project would not require development of new or physically altered facilities. Therefore, fire protections service would be adequate to serve the proposed project.

(7) Schools. The proposed project will be designed and dedicated for use by households with one or more members who are sixty-two (62) years of age or older. While there will not be restrictions preventing school age children from living with senior parents or guardians, given the age criteria and the fact that the units will only be one-bedroom in size, it is not expected that many, if any, school age children would be associated with the project, and it is not expected to have an impact on school capacity.

EXCEPTIONS TO CATEGORICAL EXEMPTIONS

In addition to investigating the applicability of CEQA Guidelines Section 15332 (Class 32), this technical report assesses whether any of the exceptions to qualifying for the categorical exemption are present. The following analysis compares the criteria of CEQA Guidelines Section 15300.2 (Exceptions) to the project, and LSA determined that none of the exceptions are applicable to the project, and that a Categorical Exemption is the CEQA recommended finding.

Criterion 15300.2(a): Location

(a) Location. Classes 3,4,5,6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

The project does not qualify for an exemption under Classes 3, 4, 5, 6 or 11. The project is located within an urban developed area and is not located within a sensitive environment. In addition, the project would not result in any impacts on an environmental resource of hazardous or critical concern. Therefore, the exception under this criterion is not applicable.

Criterion 15300.2(b): Cumulative Impact

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

The effects of the proposed project would generally be beneficial, as the proposed project would help the City increases its affordable senior housing supply. The proposed project would repurpose a developed vacant parking lot in an urban neighborhood that is already served by utilities and public services, as well as transportation. Any construction effects would be temporary, confined to the project vicinity, and reduced to a less-than-significant level by implementing specific General Plan policies and applicable regulatory requirements. No successive projects of the same type in the same place are known or expected to occur over time that would result in cumulatively considerable impacts. Therefore, the exception under CEQA Guidelines Section 15300.2 (b) does not apply to the project.

Criterion 15300.2(c): Significant Effect

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

There are no known unusual circumstances that are applicable to the project and which may result in a significant effect on the environment. The proposed project consists of the construction of 16 new senior apartments and 464 square feet of commercial space on a developed parcel of land. The project site would change from the existing use as public/semi-public (parking lot) to mixed-use (residential and commercial), which is consistent with the City's General Plan and Zoning. The provision of

senior apartments to increase the affordable housing stock in Brisbane would not introduce a new activity to the area that could result in a significant effect on the environment. Therefore, the exception under CEQA Guidelines Section 15300.2(c) does not apply to the project.

Criterion 15300.2(d): Scenic Highway

(d) A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State Scenic Highway. This criterion does not apply to improvements required as mitigation by an adopted Negative Declaration or certified EIR.

The project would not affect a resource within a State Scenic Highway.[21] The nearest scenic highway, Interstate 280 (I-280), is located approximately 3.75 miles west of the project site. Therefore, no scenic resources within view of a State Scenic Highway would be altered as part of the project.

Criterion 15300.2(e): Hazardous Waste Sites

(e) A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

The site is not on any list pursuant to Section 65962.5 of the Government Code or any other list compiled for purposes related to identifying the prior release of hazardous materials.[22,23] The site was previously a commercial building used for retail by Walgreens. Therefore, the exception under CEQA Guidelines Section 15300.2(e) does not apply to the project.

Criterion 15300.2(f): Historic Resources

(f) A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

No historic resources exist on the project site. The project would not destroy, demolish, or alter known historic resources. All construction would be confined to the project site. Project construction would not impair the significance of any historic structures.

The project site is located in an area where cultural resources are known to be found from prior surveys, or has a generally high potential for cultural resources.[24] There is a potential that cultural resource could be accidentally discovered during construction-period activities. Adherence to the

[21] California, State of, 2015. *Officially Designated State Scenic Highways and Historic Parkways.* Website: www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm (accessed July 7, 2017).

[22] California State Water Resources Control Board, 2015. GeoTracker. Website: geotracker.waterboards.ca.gov (accessed July 7, 2017).

[23] Department of Toxic Substances Control, 2017. EnviroStor. Website: www.envirostor.dtsc.ca.gov/public (accessed, July 7, 2017).

[24] Brisbane, City of, 1994, op. cit.

following condition of approval would reduce impacts to cultural resources to a less-than-significant level:

- Prior to issuance of a grading permit, the applicant shall provide written evidence to the Planning Director that a qualified archaeologist has been notified and retained to be on-site, if required by the Planning Director, during grading and other significant ground-disturbing activity. If cultural or scientific features are discovered, work shall be stopped and the archaeologist shall report such findings to the project developer and to the Planning Director. If the cultural or scientific features are found to be significant, the archaeologist shall determine in an expeditious manner appropriate actions, in cooperation with the project developer, which insure that the resources will not be destroyed before exploration and/or salvage subject to the approval of the Planning Director. Work may only begin again with the approval of the Planning Director.

On the basis of the evidence provided above, the project is eligible for a Class 32 Categorical Exemption in accordance with Section 15332, Infill Development Projects, of the CEQA Guidelines. Because the proposed project meets the criteria for categorically exempt infill development projects listed in CEQA Guidelines Section 15332 and it would not have a significant effect on the environment, this analysis finds that a Notice of Exemption may be prepared for the project.