

March 16, 2020

John Swiecki, AICP  
Community Development Director  
City of Brisbane  
50 Park Place  
Brisbane, CA 94005

***Subject: Brisbane Baylands Specific Plan, Notice of Preparation of Draft Environmental Impact Report – City of Brisbane***

Dear Mr. Swiecki:

Thank you for notifying San Francisco International Airport (SFO or the Airport) of the preparation of a new Draft Environmental Impact Report (DEIR) for the Brisbane Baylands Specific Plan (the Project). We appreciate the continued opportunity to coordinate with the City of Brisbane (the City) in considering and evaluating potential land use compatibility issues with the Project area and Airport operations.

SFO staff has reviewed the DEIR Notice of Preparation for the Project, which includes commercial (office, biotech, and campus), retail, institutional, open space, and residential development within the Project site. SFO submits the following comments for consideration in scoping the environmental analysis.

The proximity of the Project site to the Airport, and departing aircraft utilizing specific procedures over the site, means that development may need to consider regulatory reviews specific to airport noise and land use compatibility standards. The Airport Land Use Compatibility Plan (ALUCP) addresses issues related to compatibility between airport operations and proposed new land use developments, considering noise impacts, safety of persons on the ground and in flight, height restrictions/airspace protection, and overflight notification. The ALUCP was adopted by the City/County Association of Governments of San Mateo County (C/CAG) in October 2012.

The Project site is located within Airport Influence Area A, which includes the entirety of San Mateo County. Although the Project is not subject to the specific noise, safety, and airspace protection policies applicable to Airport Influence Area B, which is a subarea within Area A, there are select policies that apply to the Project. Within Area A, the real estate disclosure requirements of state law apply, as stated in ALUCP Policy IP-1. Land use development within the Airport Influence Area is currently governed by the ALUCP, and Airport staff encourages the City to work closely with the C/CAG Board to determine project consistency with the ALUCP and other regulatory review procedures.

Although the Project site is not within the Airport's 65 dB CNEL noise contour, it is subject to frequent overflights from aircraft departing SFO using the SSTIK and Shoreline Departure Procedures. Additionally, the Project site is exposed to noise from Highway 101, Caltrain, and the future California High Speed Rail line. The Project proposes up to 2,200 new residential units and a 4.6-acre elementary school site, and the DEIR must consider the effects of noise on these residential and other noise-sensitive land uses.

The DEIR should also consider the possible effects of climate change and sea level rise utilizing the projections supported by the Bay Conservation and Development Corporation (BCDC). Adapting to sea level rise along the Bay is a regional responsibility. It is critical for new shoreline development to assess

AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO

LONDON N. BREED  
MAYOR

LARRY MAZZOLA  
PRESIDENT

ELEANOR JOHNS

RICHARD J. GUGGENHIME

MALCOLM YEUNG

IVAR C. SATERO  
AIRPORT DIRECTOR

*John Swiecki, AICP*  
*March 16, 2020*  
*Page 2 of 2*

the potential risks posed by higher future sea levels. The EIR should consider flood protection measures that would be necessary to protect the future Brisbane Baylands community against rising sea levels and storm surge.

The Airport appreciates your consideration of these comments. Please include SFO Planning and Environmental Affairs on the distribution of the Final EIR. If I can be of assistance as the City considers airport land use compatibility as they relate to this project or future projects, please do not hesitate to contact me at (650) 821-9464 or at [nupur.sinha@flysfo.com](mailto:nupur.sinha@flysfo.com).

Sincerely,



Nupur Sinha  
Acting Planning Director  
Planning and Environmental Affairs

cc: Susy Kalkin, Airport Land Use Committee  
Sandy Wong, C/CAG  
Nixon Lam, SFO, Environmental Affairs Manager  
Bert Ganoung, SFO, Aircraft Noise Abatement Manager