



March 17, 2020

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

Subject: Notice of Preparation of an Environmental Impact Report for the Brisbane Baylands Specific Plan

Dear Mr. Swiecki,

Thank you for the opportunity to comment on the Notice of Preparation of an Environmental Impact Report (EIR) for the Brisbane Baylands Specific Plan.

The Local Agency Formation Commission (LAFCo) is a state mandated local agency established in every county to oversee the boundaries of cities and special districts. San Mateo LAFCo has jurisdiction over the boundaries of the 20 cities, 22 independent special districts, and many of the 33 active county and city governed special districts serving San Mateo County.

The Notice of Prepetition (NOP) for the Brisbane Baylands Specific Plan (Project) identifies a proposed development of up to 2,200 residential units and 7 million square feet of commercial use, along with acquisition of an annual water supply of 2,400 acre-feet from the Oakdale Irrigation District. The Project site is proposed to be served by City of Brisbane for water service and Bayshore Sanitary District for sewer service.

LAFCo has the following comments regarding the NOP:

The Project proposes the acquisition of an annual water supply of 2,400 acre-feet from the Oakdale Irrigation District. The acquisition of this water may require LAFCo approval pursuant to Government Code Section 56133. The EIR should fully explore the environmental impacts of the transfer of this water, including the impacts of the water supply of the Oakdale Irrigation District, the sustainability of the water source, and if the water to be furnished by the District will be potable or treated. The EIR should also consider alternative sources of water supply for the Project.

COMMISSIONERS: JOSHUA COSGROVE, CHAIR, SPECIAL DISTRICT • WARREN SLOCUM, VICE CHAIR, COUNTY • RICH GARBARINO, CITY • DON HORSLEY, COUNTY • MIKE O'NEILL, CITY • RIC LOHMAN, SPECIAL DISTRICT • ANN DRAPER, PUBLIC

ALTERNATES: KATI MARTIN, SPECIAL DISTRICT • HARVEY RARBACK, CITY • JAMES O'NEILL, PUBLIC • DAVE PINE, COUNTY

STAFF: MARTHA POYATOS, EXECUTIVE OFFICER • REBECCA ARCHER, LEGAL COUNSEL • ROB BARTOLI, MANAGEMENT ANALYST • ANGELA MONTES, CLERK

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Information about the agreement between the City and the Oakdale Irrigation District should be provided as part of the EIR as well in order for LAFCo to determine if approval is needed under the relevant Government Code Sections.

If approval from LAFCo is required, San Mateo LAFCo would be a Responsible Agency under California Environmental Act (CEQA) (CEQA Guidelines 21069). The majority of the Oakdale Irrigation District is located within Stanislaus County, with a portion of the District also in San Joaquin County. If LAFCo action is required, the respective LAFCos from these two counties would also be Responsible Agencies. Before action could be taken by any LAFCo, the City of Brisbane must certify the EIR.

San Mateo LAFCo does have not have additional comments on the NOP and looks forward to reviewing all future environmental documents related to the Project.

Sincerely,



Rob Bartoli
Management Analyst

Cc: Sara Lytle-Pinhey, Executive Officer, Stanislaus LAFCO
James Glaser, Executive Officer, San Joaquin LAFCO