

5/25/23

Clara Johnson  
BBCAG  
159 Lake St.  
Brisbane, CA 94005  
ca.johnson9@yahoo.com

John Swiecki  
Community Development Director  
City of Brisbane  
50 Park Place  
Brisbane, CA 94005  
baylands@brisbaneca.org

RE: Comments on Revised Notice of Preparation of EIR for the Brisbane Baylands Specific Plan  
City of Brisbane

Dear Director Swiecki

The BBCAG believes there are numerous shortcomings in the scope of the Revised Notice of Preparation of the EIR for the Baylands Specific Plan. We ask you to add the following items to those currently being considered.

There are 22 and 24 story buildings in this plan. The height of these buildings is entirely out of character with the entire City of Brisbane and the Bayshore Neighborhood of Daly City and the Visitacion Valley Neighborhood of San Francisco. The buildings create a 240 foot plus massive wall between Bayshore Blvd. and the S. F. Bay. It destroys views of the Bay. It violates the policy of the General Plan. There will be significant shadowing of surrounding buildings and exterior spaces. The turbulent wind patterns in this area will be impacted by them. These buildings are being built as close as possible on this property to the dormant earthquake faults the lie below Candlestick Cove. They should require a more stringent structural standard since an earthquake of 7.5 or greater on the San Andreas fault would probably end their dormant state. A failure of these high rises could close Hwy 101 and shower the surrounding development with debris. It could impact the operation of Recology and disrupt garbage collection and processing for over a million people. These buildings will be considered a hazard to the aircraft flying to/from the San Francisco Airport hourly and be a potential hazard to the Oakland Airport flights that overfly this area daily. There should not be high rise buildings on the Baylands. The height limits should not exceed 150 Ft. High Rise buildings design normally feature lot of glass on the exterior. Storms this last Winter provided a glimpse of the climate

change coming that will result in higher wind speeds and the breakage of more windows in high rises like these. The results will be higher maintenance costs over the life of the buildings and a danger to the public. The sea level rise expected grows every year and the 83 inches mentioned in the NOP is likely to be outdated by the time the Specific Plan is expected to be adopted. Will the proximity of these high rises to Hwy 101 interfere with efforts to raise the Highway or replace it with a bridge to protect north south access for the S.F. Peninsula from sea level rise? That is a possibility. A Local Windsurfer previously raised objections to building high rises in this northern Baylands location. The Open Space connects at several points but it doesn't appear to be 25% open space. It confuses open space with open areas. There isn't enough in one contiguous area to provide relief from the urban concrete and asphalt harsh heat producing environment. It also does not connect with offsite open space that would allow animals to connect with San Bruno Mtn. Mountain State and County Park or McLaren Park. The General Plan called for this kind of connection. Open Space is supposed to provide relief and comfort for the people in the project. this configuration doesn't do that. Using names like, "Baylands Preserve" and "Adaptation Buffer for Sea Level Rise", does not mean that these small areas in any way provide what those titles imply. The lack of reference to Open Areas in the NOP is surprising given that the General Plan contains many references to them. It is all the exterior area not occupied by buildings but providing access between them without an appreciable change in the environment that would allow for a relief from the density and height and bulk of the built environment. Most if not all of the Plazas you mentioned are open areas. The Roundhouse Park appears not to have a Roundhouse preserved in it. If the Roundhouse is to be preserved, then there would be a building there thereby reducing any Open Space. The Baylands Preserve is not big enough to preserve any animal. It is located on the Landfill in the area where hydrocarbons were detected. It highly impacted by water perhaps tidal water just under the current ground surface. The Adaptation Buffer for Sea Level for Sea Level Rise is an absurdly small area for this title. This lack of healing open space creates a high stress environment and violates the General Plan. The Open Space adjacent to Hwy 101 and the extension of Sierra Point Pkwy. is insufficiently wide to mitigate the tremendous noise and toxic air emissions from thousands and thousands of cars, trucks and buses on the ten lane freeway. It could not be a place of peaceful enjoyment because of the above mentioned emissions and the vibrations that would be felt from the vehicles plus the vibration of CalTrain near Tunnel Ave. It requires more space and sound walls made of some transparent material that blocs the noise but not the light and view in order offer respite. The linear open space toward the west side is too narrow to qualify as open space. It is open areas between lanes of traffic. The whole scheme of open space is like an amenity for the building s rather than a benefit for the people who live, work and visit the development. The playing fields must be carefully evaluated for toxic contamination from the former Brisbane sewer plant and from the Brisbane Fire Station since there had to have been large amount of PFAS chemicals used there. Children should not be exposed to toxic

contaminants while playing sports for years. The lack of open space on the Baylands will create a high stress environment that will not encourage people locate there. Land covered with solar panels is not open space.

The planned battery facility and electrical substation have the possibility of creating more toxic contamination and a safety problem since they are placed close together. If one catches fire then the other one is highly likely to be damaged. There hasn't been any info on the electro-magnetic fields created by these facilities and what injury it might cause to occupants.

The route of the newly acquired water supply's path to the site is described but its environmental impact is not and it should be. It requires a newly built tunnel. I'm sure there are environmental impacts from its construction

There have been interruptions in the traffic flow on Bayshore Blvd caused by telecommunications and other utilities that are too numerous to mention. There does not appear to be a plan to improve this traffic slowing problem of 40 years despite the obvious degradation in traffic flow that this project will bring. This is a stress issue and a circulation issue. The dry utility vaults on Bayshore and along roads in the Baylands should be constructed so that many different utility companies can quickly add lines within the vault and minimize traffic flow problems.

The strong possibility that this development will cause flooding in adjacent communities and adjacent areas Like Little Hollywood, the Recology site, Sierra Point Lumber, Kinder Morgan and the Machine Equipment Company is strong give the amount of soil that will be moved to portions of the Baylands raising those areas above the sites mentioned. What mitigations will be installed to lessen the possibility of flooding? It is irresponsible to allow a huge development to be built without strong specific assurances that this flooding can be avoided.

This Specific Plan calls for the construction of a Middle School on the Baylands. The conditions on the Baylands including: toxic contamination, soil likely to liquify in an earthquake, a 10 lane freeway with high noise and air pollution, a landfill site, a rail line and a regional petroleum distribution facility close by, are not what is considered appropriate for a school site by the Guidelines for School Siting of the CA Dept of Education. It is not an appropriate site. Would you want to your kids to spend 5 or 6 hours a day, 5 days a week in this harsh environment with inadequate open space?

The DTSC has land use restrictions that prevent parking below ground level and restriction that prevents residential use at ground level as well as some uses involving children for the Baylands OUSM The soil is only partially remediated. Contamination does remain in the soil. The plan

calls for parking below ground in some high rise buildings. There is discussion of active ground floor businesses and it isn't clear if that includes uses involving children such as childcare. Why are these uses being considered when DTSC does intend to allow them?

A lack of bike lanes separated from trucks and cars creates a high risk environment for bicyclists. There should be bike lanes that are separated from motor vehicles. This is a health and safety issue.

The relocation of fire Station 81 places it in a low area on Valley Drive. It is not as low as the current site. Since it is being moved, why would you put it in a site that in the distant past was a place where water ponded especially in light of Sea Level Rise. This an environmental issue

The need for coordination and cooperation with all relevant agencies, including the financial costs of a lack of coordination should be considered absolutely essential for this project. The City of Brisbane should require written proof of the coordination plans and agreements among the parties and the developers before construction begins.

The issue of the unresolved geometrics proposed for Geneva Avenue/Bayshore Blvd/Bridge over CALTrain could be a disaster. This problem was noted in the first EIR. It needs to be solved before construction begins. It appears that the construction plan for the bridge violates the laws of physics and the configuration of the land at this location. You cannot leave this issue unresolved.

Air Quality, Noise Pollution mitigations must be clearly understood and rigorously enforced for all the years of construction and beyond. What is the methodology and entity that assures this will happen?

Biological Resources have been undervalued on the Baylands and this is an opportunity to correct that. Anything plant or animal that lives on the Baylands is in grave danger of being eliminated. An ecosystem is a web of life and this project with its 22 feet of soil transported around heights placed at elevated and then shaped compacted will only leave micro-organism intact. The construction will result in some level of contamination on all the wetlands, the inadequate open spaces. It is necessary to have an aggressive well researched plan of action to save anything.

Hydrology and Water Quality deserve an exceptionally careful review and perhaps could be peer reviewed. The sewage system on Sierra Point stinks today near the former Dakin Bldg. because inadequate gravity fall and force main pressure. It seems possible or even likely that the same problem will occur here. How will it be prevented?

Adding 19,000 workers and 4,000 to 6,000 will overwhelm all the governmental services provided by the City, School District and the County. A review of the shortfall must be rigorously analyzed and realistically addressed. More detail is required to see how this will be efficiently and effectively accomplished.

The contamination and landfill wastes that underlie the Baylands needs to be monitored, reported on and if additional remediation is required, then it must be overseen. This task requires an entity that has funding, is staffed by experts and is managed professionally. There should be a safety and hazard district, a Mello-Roos District to perform these duties and maybe other duties, overseeing other safety and hazardous issues. There should be air quality monitoring on site to monitor the air pollution from the Kinder Morgan Facility since there will be 25,000 people in close proximity.

The Brisbane Lagoon does not belong to UPS or its subsidiaries. It should be evaluated, restored and maintained to fulfill its ideal role as a part of the Bay. It has been treated as an afterthought to be exploited. It should be given to the City for its protection.

Our BBCAG responsibility relates to human health and environmental quality and I believe that all the issues mentioned above fall into those categories.

Thank You for the opportunity to comment on the Revised Notice of Preparation of the EIR on the Revised Brisbane Baylands Specific Plan.

Sincerely

Clara A. Johnson  
Brisbane Baylands Community Advisory Group  
Vice-Chair, Acting Chair

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