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General Comments on the DEIR Baylands

Comm. Dev. Dept. Brisbane

Submitted by Clara Johnson

The Specific Plan, the developers proposal and its alternatives with the exception of the Renewable Energy Alternative make a mockery of many of the goals of the 1994 General Plan.

The chapters of the General Plan list the goals at the beginning. This is a list of the primary goals that are violated by this proposal.

The City of Brisbane

1. "will remain a place independent and distinct",  
Comment: This project will erase any physical distinction by placing residents and businesses contiguous to San Francisco.
2. "With a small town quality ....."  
Comment: The addition of 12 or 8 or 7 Million square feet will obliterate any small town quality."
3. "provides sufficient revenues for necessary City services"  
Comment: I have asked for a fiscal analysis of the short medium and long term effects of development on the Baylands and while they are thought to be coming soon, there is no reason to believe they will be favorable. The cost of maintaining the mitigations to prevent further impacts on human health and the environment will offset revenue gained from property tax. The nearby Visitacion Valley has crime problems typical of a lower middle income area and will require a much more aggressive police presence. The fill is constantly compacting and roads need frequent repair. The settlement of the fill will result in high maintenance costs for the utility infrastructure. Sea Level rise will result in the need for expensive measures to try to protect the people the buildings and the systems installed to try to remediate toxic contamination on the site.
4. "Sees sustainable growth as dependent on preservation and replenishment of natural resources"  
Comment: This project has: air quality, greenhouse gas emissions, and traffic creation significant impacts that cannot be mitigated. It will degrade the air quality. Our air quality is a natural resource and the project will create an unhealthy environment when combined with all the other nearby projects in San Francisco. Climate Change is impacting the prevailing winds which may come from the northeast, as they have in December 2013 instead of from the northwest and this change will blow the pollution directly into residential Brisbane. The wetland areas of the Baylands are a natural resources, 27 the wetland areas identified in a survey, the north ditch( where stickleback fish live), the interior drainage ditch and the Lagoon and its shores. The project does not preserve the natural qualities of these areas. It treats them as adjunct areas to their buildings and roads.
5. "Preserve the mountain for its own sake and as the symbol of the unique character and identity of Brisbane."

5. Cont. Comment: The mountain is known for its endangered butterflies who feed on specific plants on the mountain. The increased air pollution caused by the project and the cumulative effect of all the planned projects plus climate change caused wind direction changes will result in contaminated the butterflies food plants and pushing the endangered insects to extinction.

6. "incorporate and reflect the natural environment as an integral part of land use"

Comment: The project was not allowed to destroy the natural resources mentioned above but it does not reflect them or seem to value them and their role in our ecosystem.

7. "Design infrastructure and public facilities to be efficient, cost effective and to contribute to the cohesion and character of the community."

Comment: There isn't any evidence in the design that the cohesion or character of Brisbane was considered at all. The project actively works to destroy Brisbane's character by placing an estimated 10,000 new residents in an entirely different urban, noisy, pollution filled environment in contrast with the 4000 current residents who live in a village on hillsides surrounded by open space.

8. "Where citizens can travel safely and comfortably from north to south, from mountain to the bay"

Comment. All of the intersections are going be at level E or F and the freeway will be very slow as a result of this development and those being built nearby. It will be a stressful time wasting polluting nightmare. It will not be comfortable and it will be less safe than it is currently by virtue of the volume of traffic.

9. " Where open space lands have been set aside to protect the natural environment" "Where

10. Open space and natural area provide respite to both residents and businesses"

Comment: The intent of the 1994 General Plan was to leave about 50% of the Baylands in open space and the developer has that down to 23%. It is difficult to find respite from 12 million/8/7 million square feet of development.

11. "And there is an awareness of the finite nature of resources"

Comment: There is no awareness of the finite nature of resources when you seek to build a project with significant air pollution, greenhouse gas emissions and traffic impacts that cannot be mitigated because they are so extreme. The project overwhelms the City.

12. " The City acts to prevent the loss of life and property and damage to the

13. environment by addressing hazards in the use of the land." And "There is peace and quiet"

Comment: There are many contaminated areas on the Baylands the full extent of the contamination is not clearly understood despite many studies. The nature of the underlying

land is that it composed of un-engineered fill, bay mud and refuse in the landfill and rubble in the northern railyard. This land presents many challenges. It is subject to tremendous shaking in an earthquake. The current maximum credible earthquake is from 8 to 9M richter. The ground compacts. It also has a very high water table and will be impacted by sea level rise. This land is subject to many hazards and should be only lightly developed. There will be no peace and quiet here because of the 10 or more traffic lanes of Hwy 101 and The four lanes of Bayshore Blvd and the trains on the rail line that runs through the property. There may be high speed trains on the rails. The proximity of SFO means there will be frequent aircraft noise. The light rail and numerous busses will pass through the development creating more noise plus the traffic on the local streets.

The above comments indicate how the proposed development is at odds with major goals of the 1994 General Plan.

The Baylands has its own list of policies in the General Plan. One of those Policy 330.1 Prohibits housing on the Baylands . It is for good reason.

Policy 335 calls for giving aesthetic consideration to views of San Bruno Mountain, the Bay and the Baylands development itself from Central Brisbane.....Comment: The development plants windrows of trees on its eastern side to prevent views of the bay. There are a number of surface parking lots that won't look great from central Brisbane.

Policy 357 requires the identification of wildlife habitats and encourages retention and/or enhancement of their natural feature and habitat values in consultation with responsible agencies and independent professionals. This project denies the existence of wildlife habitat and with that denial runs roughshod over any that exists. They confuse wildlife with endangered species or perhaps they are prescient.

Policy 359 calls for wetlands restoration which they seem to interpret as bulldozing it.

Policy 362 calling for improved water quality is not addressed adequately in the proposed project. Is there any mention of plans to improve water circulation and water quality in the Lagoon as required by Policy 363

Policy 370 has not been adequately done since not all of the potentially harmful man made chemicals have been tested for. Neither has Policy 371 been satisfied since the underlying assumptions of the risk analysis for toxic lands and lands of possible liquefaction potential have not been clearly articulated to the public in lay terminology.

The proposed project will destroy the character of Brisbane because of its size, its configuration and the 10,00 strong residential component of it. It will degrade the local environment with its pollution and traffic and the quality of life in Brisbane will degrade.

A finding of overriding consideration for this project is not justified for the following reasons.

The significant impacts of the developer submitted Specific Plan are so destructive and degrading to the health of the local human population that it is impossible to envision overriding considerations that could be cited to allow its construction. The air quality and traffic impact stress inducing changes to the Baylands area would alter and degrade the local environment. The size of the project is entirely at odds with the plentiful open space and usually, clean air found in Brisbane. The air quality will suffer significantly as a result of the traffic caused by this project

The cumulative impacts of other nearby projects and predicted general increases in traffic on Hwy 101 at the county line made by ABAG and MTC indicate that Air quality will be degraded for the people of Visitacion Valley, Little Hollywood, Daly City- Bayshore neighborhood and the people of Brisbane. This degradation will result in more illness and greater chance of death among the population in these areas. Air Resources Board Studies of people living along heavily traveled freeways in the southern central valley indicate greater chance of miscarriages for women living in proximity to those freeways. The residential neighborhoods proposed here place women in a similar situation with regard to freeway traffic and air quality impact. There are no overriding circumstances that justify this projects construction. Everything that is proposed here is readily available nearby in previously approved projects. Vacancy rates in existing office buildings and biotech facilities on the northern S.F. peninsula demonstrate the lack of overriding necessity to build those facilities.

Overall comment, All the Appendices should be able to be located. There should be a master Table of Contents that allows sections to be found. The material in all the Appendices should be placed with the DEIR because as a Planner pointed out, the DEIR and the Appendices, if kept separately tend to get separated and lost over time.

A comment has been made that this program EIR is written in such a way that it will be used to claim that there is no need for a project EIR. Since this EIR lacks specificity about the nature of the project, it is impossible to understand the impacts of something unknown and therefore substantial work will be required for each project EIR.

This project is inappropriate for its location. The comments written above explain why. It is irresponsible to build it from a human health and environmental point of view and from the perspective of the 1994 Brisbane General Plan.

Thank-you Clara Johnson