SEQUOIA AUDUBON SOCIETY

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

RECEIVED
JUN 13 2011
Comm. Dev. Dept. Brisbane

Dear Mr. Swiecki,

We, the Sequoia Audubon of San Mateo County chapter of the National Audubon Society, with 1500 members, would like the EIR of the Brisbane Baylands to address the following questions and issues as it reviews the Universal Paragon proposal:
The Brisbane Lagoon is 110 acres, and is an important resting point for migratory birds and birds sheltering during storms. It drains into the SF Bay, and is the home for 20-30 bird species.
We ask that a total count of species and number of individuals be executed on both the Lagoon and the total Baylands property during the migration season, in February, 2012, and at another period 4-6 months after that, based on the timing recommendation of specialists in reptiles, amphibians and mammals. This would serve as a base-line study against which to measure species growth or degradation after that period.
We also ask, if the developers' efforts do not begin, that these baseline studies of species and population be executed every two years thereafter, at the developers' expense.
We ask that similar baselines studies be executed in 2012 concerning water quality monitoring for the lagoon and all other drainage channels on the Baylands property, with two year follow-ups. Water monitoring studies should include studies of the winter benthic conditions (bottom of all existing bodies of water as measured in February), to include counts of shellfish and other bottom-life that act as food source for birds and other species.
The current "North Ditch", a creek that is the current habitat for Great Blue Heron, and Great and Snowy Egrets, is to be replaced by a "River Creek Park". Whether this rerouting of the North Ditch, and other existing drainage channels currently existing on the Baylands, will provide more or less habitat for the birds is one issue that needs to be studied in the water quality monitoring study.
The proposed Interpretive Center and Boat Launching Facility, as marked with an X on page 135, and the boardwalk pictured on page 129 of your proposal, are shown as being built on or adjacent to the mudflat that is the north shore of the lagoon. This is where the resident species of the lagoon nest and raise their young. We are concerned that these facilities would interrupt breeding and feeding patterns of the residents. Additionally, migrants rest there during their long journeys, and a variety

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of San Francisco Bay birds seek shelter in that area during wind and rain storms throughout the year. We feel strongly that the north shore of the lagoon from the water to Lagoon Road should remain undeveloped, with only the weeds being removed and replaced with native plants, timed to cause minimal stress to the wildlife.

If the Interpretive Center remains in the plan, we would prefer to see it placed near the area of the current fisherpersons' parking lot along the Sierra Point Road. We would prefer that boating not be allowed at all; however, the launching facility could likewise be placed on the eastern shore.

The edges of the River Creek Park and the Lagoon need to be kept in a natural state, with no gravel or riprap added to the bottom. Shorebirds feed by probing the mud for invertebrates. Edge water needs to be shallow so that the birds can easily access the mudflats.

Birds in any setting are very bothered by disturbance. The Lagoon and River Creek Park need to have a wide buffer zone around them free of walking, running or bicycle paths, picnic tables, playing fields or roads. Dogs need to be on leash or preferably banned in these areas. Any parts of the plan that include these types of areas should not be counted as "open space" in the plan.

During the construction phases of the project, machines and construction material should be stored well outside the buffer zone of the waterways. This was not done when the bridge was built over the lagoon, and that effort resulted in severe destruction of habitat west of the Lagoon. With such a massive building effort as the Baylands, extra precautions need to be taken to protect the buffer zones around existing waterways.

We would also ask that Sequoia Audubon have access to the private Baylands property at least once a year, to complete bird counts of the population and species of the birdlife, and other species found there.

We look forward to further dialogue as this project progresses.

Sincerely,

Laurie Graham

Laurie Graham
Conservation Member for the Baylands
Sequoia Audubon Society

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