



Clean Water Action

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To: John Swiecki, City Clerk

From: Jennifer Clary

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Date: April 22, 2006

**Re: Scoping comments for Brisbane
Baylands Phase I specific plan**

Pages (including this one): 3

I understand from Dana Dillworth that you did not receive Clean Water Fund's March 27th scoping comments. Please find them attached.

Please let me know if you need any additional information

Thank you,

National Office ✕ 4455 Connecticut Avenue, NW ✕ Suite A300 ✕ Washington, D.C. 20008 ✕ Phone: 202 895 0420

Clean Water Action is a national citizens organization working for clean, safe and affordable water, prevention of health-threatening pollution, creation of environmentally-safe jobs and businesses, and empowerment of people to make democracy work.

CLEAN WATER FUND

March 27, 2006

John Swiecki, AICP, Principal Planning
City of Brisbane
50 Park Place
Brisbane, CA 94005
VIA FACSIMILE: (415) 457-5547

Re: Scoping comments for Environmental Impact Report Brisbane Baylands Phase I Specific Plan

Dear Mr. Swiecki,

On behalf of Clean Water Fund, I would like to submit the following comments for consideration in the environmental review of the Brisbane Baylands Phase I Specific Plan.

1. The Project Description and environmental review need to include the entire site. The peer review of the site remediation efforts conducted by Camp Dresser & McKee Inc. makes it clear that the remediation, monitoring and mitigation of site contamination is best accomplished by developing and executing an area-wide plan. This plan should include prospective uses and the level of cleanup needed to accommodate those uses.
2. An Alternative that removes all contaminated fill should be reviewed as the environmentally preferable alternative. The proposed site remediation would require ongoing monitoring and use restrictions. This document should describe and evaluate an environmentally preferable alternative that fully and appropriately removes and disposes of the contaminated soil.
3. The contribution of the Kinder-Morgan Tank Farm to the site contamination must be evaluated and mitigated. While this facility is not part of the project, its proximity to the site and its history of toxic spills into the site make it essential that it be included in the overall site remediation plan. A remediation alternative that proposes capping the Baylands site while allowing a continuing adjacent source of contamination to pollute the new fill cannot be considered adequate. The closure of the tank farm should be included in at least one alternative.
4. The health impacts of capping the site must be evaluated and compared with the health impacts of full site remediation. The current project description leaves significant sources of contamination under the site. While residential use is forbidden, many of the prospective uses in the plan are labor and visitor intensive and will have a significant health impact.

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5. Groundwater recharge from the Sunnydale watershed must be studied as a possible avenue for leaching of contaminants. The situation of the Baylands at the base of the Sunnydale watershed means that stormwater runoff not captured by the City of San Francisco's combined sewage and stormwater system flows into the project site and will continue to do so under the proposed plan. The proposed remediation of groundwater impacts is not ensured through capping of the site.

6. Cumulative impacts on Southeast corner of San Francisco. This project will clearly have substantial impacts on the adjacent San Francisco and Daly City neighborhoods, including the Bayview Hunters Point and Visitacion Valley neighborhoods, which are already impacted by poor air quality and issues of environmental and social injustice. It is essential that the cumulative impacts of this project on an already impacted community be fully evaluated and mitigated.

A major truck traffic route is being developed through the Bayview neighborhood; the air quality and traffic impacts of the Baylands project should consider the probability that a considerable amount of traffic generated by the project will make use of this route.

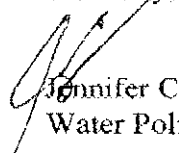
Additionally, the majority of uses envisioned in this specific plan are entry and low-paying jobs, which will generate a need for low-income housing that is currently not being met in either San Francisco or San Mateo Counties. This EIR should determine the ability of Brisbane to absorb this population over the life of the project, and discuss the impact on public transportation and housing stock around the Bay for those who must commute to the site from outside of Brisbane.

7. On-site stormwater treatment plan must be part of project description. Whether or not a cap is to be used to prevent stormwater infiltration, a stormwater management plan will have to be developed to collect, treat, and discharge surface water. We recommend at least one alternative that recreates and extends the historic creek system in the area. We strongly urge that the preferred alternative NOT consider diverting surface runoff to San Francisco's combined sewage and stormwater system for treatment. The addition of almost 700 acres to the area of stormwater runoff served by the Southeast Treatment Plant would significantly increase the number, duration, and volume of combined sewage overflows (CSOs) as well as local flooding in the area of the treatment plant.

8. The existing use and potential of the Baylands as a wildlife corridor should be evaluated.

Thank you for providing this opportunity for input. Please feel free to contact me if you have any questions.

Sincerely,



Jennifer Clary
Water Policy Analyst