

BAYLANDS SPECIFIC PLAN ISSUES
for 4/27/06 meeting
(NOP Posted SCH web site as 2006022136)

*from Dana
xWilliam R*

Lack of response to NOP by some responsible agencies might indicate that the Initial Study is inadequate or not circulated widely enough.

Was US Fish and Wildlife (USF&W) noticed? Description in the Initial Study should have stated that there is potential for presence of rare and endangered species. There are remnant grasslands and wetland habitats from freshwater to intertidal ecosystems. Salt Water Harvest Mice, Clapper Rail, Red-Legged Frogs, Burrowing Owls, San Francisco Garter Snakes and other rare and endangered species are potential inhabitants and have not been fully studied. This might have altered USF&W's (lack of) response.

Lack of responses from Air Quality, State Lands Commission, BCDC, State PUC, Energy Resource divisions, State Water Resources, and others defy reason.

Proximity to schools as listed in the NOP should include:

- Robertson Intermediate
 - Bayshore Childcare Services-Midway Center
 - Bayshore Elementary
 - First San Francisco Children's Center Pre-school
 - Visitacion Valley Elementary School, etc.
- (if the .25 mile standard is applicable.)

ENVIRONMENTAL CHECKLIST

I. **AESTHETICS** does not mention views toward San Bruno Mountain Park. It claims that nighttime light pollution shall be addressed but fails to quantify the problem outside of declaring it potentially significant. One could look to Japan's "Lights-out at 8pm" self-imposed Global Warming-conscious measure as an example to addressing this issue vs. "minimize" the impact.

II. **AGRICULTURE RESOURCES** in the form of grazing horses/animals are overlooked. They may be a positive environmental and educational resource for weeding hillside lands like Ice House Hill and adjacent San Bruno Mountain Habitat Conservation Plan areas.

III. **AIR QUALITY**. There is reference to conceptual grading plans in the Specific Plan to move thousands of cubic yards of soil, contaminated at various levels. Air Quality impacts are certain to occur, yet there is no mention of air impacts outside of the construction phase, and consequently, no response from BAAQMD?

IV. **BIOLOGICAL RESOURCES**. Legal descriptions based on studies done in incorrect seasons¹ should be considered suspect. 600 acres adjacent to the Bay with recognized "habitat quality... considered low," is because it ignores the presence of upland habitats, the host plants for the Callippie Silver Spot that are visible in the proper season, seasonal and diurnal migration of animals, and the adjacent Lagoon habitat. Agency-accepted plans (outside of the purview of the public) have not looked at alternatives or long-term analysis as required by CEQA.

Potential to create new parks, redirect natural water flows, to maintain connectivity of protected ecosystems, AND a General Plan requirement to mitigate losses of wetlands should not be understated

¹ Wetlands Research Assoc. 2001 and Burns and Mac Donnell Engineering firm 2003

or overlooked. Adjacent upland habitat conservation plan goals and mitigations should be clearly stated and explored. While the author of this specific plan is not a signator to the San Bruno Mountain Habitat Conservation Plan, the City of Brisbane is a Trustee and should act accordingly or disclose their dual role.

VII. HAZARDS AND HAZARDOUS MATERIALS. In addition to reviewing “existing information regarding potential presence of hazardous materials on the site” additional tests and mapping of risks from underground fuel lines, underground springs, undisclosed toxic “Hot-spots” within and adjacent to the dump, and their associated long-term impacts should be fully disclosed. All waste haulers will mention the “hot spot” where they know chemical hazards are greater. There may be several “hot spots” in Phase I as the dump progressed southward. These latent risks of explosion and health issues are barely considered.

The chances of off-gassing and cumulative, un-remediated toxic issues in adjacent properties is not mentioned. Wastes from the former sewerage plant, now fire station, the Unocal building, now City Corporation Yard, Kinder Morgan Tank Farm and buried toxins along Industrial Way from tanneries and chemical production are also hardly mentioned. Current autobody grinding and painting and other business practices along Industrial Way are not adequately disclosed in spite of a requirement to disclose conditions for the entire area. This information could help direct the sequencing and integrate planning of development.

ALTERNATIVES

EACH AREA REVIEWED BY THE EIR COULD HAVE ALTERNATIVES
EACH ALTERNATIVE CONSIDERED COULD HAVE CUMULATIVE IMPACTS

TRANSPORTATION

Car-oriented Plan, On-street Parking vs. Perimeter Parking Valet Delivery System
Health-focused Walking Village with Electric/Alternative Fuel-only Vehicles
Locations of Connections to Bayshore Boulevard
Elevated vs. Submerged Transportation Corridors
Prohibit Diesel-Idling Zones, Require Alternative Goods Movement Rail System

REMEDIATION TECHNIQUES

Landfill – Passive or Engineered Barriers, vertical and horizontal isolation required
Multiple technologies, fast or slow decomposition?²
Cleanup Now or Fester Forever? Best Long-term Alternative?
Peel back layers to increase tidal influence. Reduce, consolidate waste, resource mining
Lead-impacted soils removed-over time, electrokinetics, full clean up vs. leave behind
Remove Hydrocarbon-impacted soils; holes become mitigated wetlands vs soil cover
Solvent-impacted soils removed. Remediation until residual is non-detect after 2 wet seasons
Remediation Campus- In Situ Bioremediation, Phytoremediation, Mycoremediation

USES

Interim vs. Long-term Choices
Brief-Visit, Zero-impact, Zero-Waste or +Positive Energy Zones

² G. Fred Lee “Wet Cell Versus Dry Tomb...”debate, “Landfills and Groundwater Pollution Issues...”
“Geosynthetic Liner Systems for Municipal Solid Waste Landfills...”1993 “The
Effectiveness...SWANA Applied Research,”2004 and Flawed Technology of Subtitle D Landfilling...”
Updated 2006, and other publications.

Aggressive Multi-plexed Renewable Energy Zone (Hydrogen, Wind, Solar, Heat, Tidal, and Bio-fuels) funded by State Public Interest Energy Research Programs³ or the like
Entertainment, Convention, Concert to Cinema Center- North of Geneva
Fast-track for the Olympics?

LAGOON

To Dredge or Not? Siltation Good? Algae Blooms, Solar-powered Aeration Project
Require Exotic Species Removal, Long-term Maintenance Plan required
Study Current and Historical Wildlife Habitats and Migration to determine impacts
Multiple Lagoons through Remediation
Encourage Sustainable Food Production: Fish Hatchery, Shellfish Beds, Fungi, Hydroponics

WATER RESOURCES

Intercept groundwater before it enters toxic areas
Require, not consider, Wastewater Recycling and Wetlands Remediation per '94 GP
Retention of rainwater through cisterns or reservoir
Consider a fish hatchery and re-creation of spawning habitat in mitigation
Utilize a California River Parkways Act Plan⁴, or better, in the Brisbane Baylands
Use creek restoration project for an educational museum, public and wildlife benefits
Landfill closure and post-closure maintenance plan's impact on mitigation measures and uses
Requires cleanups and years proven before development.

JOBS/HOUSING BALANCE

Consider Limited-access, Limited-exposure, Limited-development Alternative.

KINDER MORGAN TANK FARM and OTHER SAFETY ISSUES

Relocate underground pipes for safety, public health
Relocate entire operation for safety, public health
Utilized Open Space designation for safety, public health
Study impact danger zones from tank farm and dump accidents

FINANCIAL CONSIDERATIONS

Project as proposed an Asset or Liability?
Opportunity for Renewable Energy Business Incubator, Community-based business hub
Review ownership history and experience with bonds, construction, business
Percentage of non-profit, wholesale, transient, internet, point-of-sales issues

STILL ON THE BOOKS

Risks with Liquefaction and Industrial Accidents with Continued Industrial Designations
Protective Measures for Research and Development, UC Campus, and other unregulated uses
Impacts of Fragmentation of the Project

PLAN WITH SPIRIT, VISION, UNIQUE ATTRACTION – PowerPoint

³ Cal PRC Sec 25620 et seq “ appropriate for the state to undertake public interest energy research, development, and demonstration projects that are not adequately provided for my competitive and regulated energy markets.”

⁴ Cal PRC Sec 5751 (i) to “assist public agencies and nonprofit organizations in establishing, developing and restoring river parkways.” And ⁴ Cal PRC 5753 (2-5) “[p]rotect, improve or restore riverine or riparian habitat, including benefits to wildlife habitat and water quality.”