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November 20, 2012

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

RE: Brisbane Baylands Phase I Specific Plan (Case SP-1-06) – Revised Notice of Preparation

Dear Mr. Swiecki:

Thank you for providing the City of Daly City an opportunity to comment on the proposed Brisbane Baylands Specific Plan environmental review. We would like to re-emphasize previous comments we made last December and also provide additional comment. While we are confident the Programmatic EIR will address the areas of most concern to our jurisdiction: land use, traffic, the provision of water and other utilities, air quality, noise and housing, please accept the following comments:

- The City of Daly City is concerned about the overall traffic that will be generated by the project and would expect that the traffic analysis would consider the roadway network within our jurisdiction. Daly City has completed its own traffic model and would be willing to share the results of our model, as it pertains to Daly City's projected growth, to assist in the City of Brisbane's efforts in this regard.

- The NOP identifies that the EIR will analyze noise impacts associated with construction and demolition as well as the impacts of existing noise sources on the proposed land uses. Given the likely significant increase in traffic caused by the project, the City of Daly City would like the EIR to consider the traffic and other project related noise impacts of the new development on Daly City's adjoining Bayshore neighborhood.

- As described in the NOP, it is expected that the City of Brisbane may need to enter into cooperative agreements with the City of Daly City for a variety of public services such as fire stations, infrastructure, roadways, and intersection improvements. Given the potential impact this project may have on recreational facilities, we would also want to know if cooperative agreements would be necessary for recreational facilities. We would be interested in learning more details of these anticipated agreements at the soonest opportunity.

- While further analysis will be conducted through the EIR preparation there is one issue we would like to highlight. With the passage of SB375 and the Sustainable Communities Strategy, the goal is to balance housing and jobs in an area where there is a surplus of jobs. The Community-Preferred Alternative proposes no housing. When considering this alternative as well as the Developer-Preferred Alternative, an analysis of how the creation of tens of thousands of jobs will affect regional housing needs is crucial. Specifically, what neighboring jurisdictions, such as Daly City, could expect to be required to provide housing beyond what was previously projected?

As this project progresses through the environmental review process, the City looks forward to obtaining more information and being included in the review of the Draft Environmental Impact Report.

Regards,



Brian Millar
Director of Economic and Community Development