San Francisco International Airport

December 23, 2010

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

Subject: ***Brisbane Baylands Specific Plan, Notice of Preparation of Draft Environmental Impact Report – City of Brisbane***

Dear Mr. Swiecki:

Thank you for notifying San Francisco International Airport (SFO or the Airport) of the preparation of a Draft Environmental Impact Report for the Brisbane Baylands Specific Plan. We appreciate this opportunity to coordinate with the City of Brisbane (the City) in considering and evaluating potential land use compatibility issues that this and similar projects may pose.

SFO staff has reviewed the revised EIR Notice of Preparation for the Brisbane Baylands Project (the Project) and the alternatives that will be evaluated in the forthcoming Draft EIR. The Project involves significant office, retail, industrial, institutional, open space, and possibly residential development within the Project site. SFO submits the following comments for consideration in scoping the environmental analysis.

The City of Brisbane, including the Project site area, is located within the Airport Influence Area, as defined in the Comprehensive Airport Land Use Plan (CLUP) for SFO. The SFO CLUP addresses issues related to compatibility between airport operations and surrounding land use development, considering noise impacts, safety of persons on the ground and in flight, height restrictions/airspace protection, and overflight notification. Land use development within the Airport Influence Area is currently governed by the CLUP adopted by the City/County Association of Governments of San Mateo County (C/CAG) in 1996. The SFO CLUP is in the process of being updated and is anticipated to be completed by mid-2011. Since the CLUP update is likely to be completed and adopted before the Final EIR, it is advisable to consider the policies of the draft updated CLUP in preparing the environmental documentation for the Brisbane Baylands Specific Plan.

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In evaluating the Developer-Sponsored Project land use scenario, which proposes up to 4,434 new residential units, the EIR must consider the effects of noise on residential uses. Although the Project site is not within the Airport's 65 dB CNEL noise contour, it is subject to frequent overflights from aircraft departing SFO using the Shoreline Departure Procedure. Additionally, the Project site is exposed to noise from Highway 101, Caltrain, and the future California High Speed Rail line. Noise impacts on sensitive receptors and any necessary mitigation measures should be fully evaluated in the EIR.

The Renewable Energy Alternative involves building solar photovoltaic (PV) and wind energy facilities to create a self-sustaining development, and potentially to generate surplus electricity for outside communities. SFO is concerned about the possible safety risks that may be associated with potential radar interference caused by wind turbines. These effects could create conditions that are unsafe for air navigation. SFO maintains a responsibility to protect the public by minimizing exposure to risks associated with potential aircraft accidents, and to prevent the creation of new safety problems. These environmental risks should be discussed with reference to public safety in the EIR.

The EIR should also consider the possible effects of climate change and sea level rise utilizing the projections supported by the Bay Conservation and Development Corporation (BCDC). Adapting to sea level rise is a regional responsibility. It is critical for new shoreline development to assess the potential risks posed by higher future sea levels. The EIR should consider flood protection measures that would be necessary to protect the future Brisbane Baylands community against rising sea levels and storm surge.

Please include SFO Planning and Environmental Affairs on the distribution of the Draft EIR, allowing sufficient time for SFO to review the documents. In addition, as part of the process toward plan implementation, SFO understands that the City will need to amend its General Plan and zoning code. The Airport requests the opportunity to review these connected General Plan and zoning amendments when they are available.

The Airport appreciates your consideration of these comments. If I can be of assistance as the City considers airport land use compatibility as they relate to this project or future projects, please do not hesitate to contact me at (650) 821-7867 or at john.bergener@flysfo.com.

Sincerely,



John Bergener
Airport Planning Manager
San Francisco International Airport
Bureau of Planning and Environmental Affairs

cc: Nixon Lam, SFO BPEA, Manager of Environmental Affairs
Bert Ganoung, SFO ANAO
Dave Carbone, San Mateo County Airport Land Use Committee