SAN FRANCISCO BOARDSAILING ASSOCIATION

1592 UNION STREET, BOX 301 • SAN FRANCISCO, CALIFORNIA 94123

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Mr. John Swiecki, AICP
Community Development Director
City of Brisbane
50 Park Place
Brisbane, CA 94005
eir@ci.brisbane.ca.us

Subject: Comments to the Revised Notice of Preparation for the Brisbane Baylands Specific Plan – Draft Environmental Impact Report and the need to fully address potential Impacts to the Recreational Use of Windsurfing

Dear Mr. Swiecki,

This letter provides comments with respect to the scope and content of the Revised Notice of Preparation (NOP) for the Brisbane Baylands Specific Plan.

The San Francisco Boardsailing Association (SFBA) is a not-for-profit organization founded in 1986 to protect and enhance boardsailing access, and to promote safety and related education in the San Francisco Bay Area. To this end, SFBA actively participates in the planning processes for development, reuse and redevelopment of public and private properties adjacent to San Francisco Bay and the Pacific Ocean which may enhance, threaten and/or directly or indirectly impact the recreational uses of Windsurfing and/or KiteBoarding.

SFBA's main concern with the Development Alternatives proposed in this NOP are focused on the significant potential of the projects to alter existing air movement patterns - i.e., degradation of wind quality downwind of the project by creation of turbulence and/or "wind tunnels" or similar conditions. The large scope and upwind massing of the Alternatives described below, including the size and placement of structures (buildings, wind turbines, etc.), has the potential to significantly degrade or even destroy the ability to windsurf in one of the most cherished windsurfing locations on San Francisco Bay.

The landowner and Project Applicant, Universal Paragon Corporation, has submitted a specific plan application to the City of Brisbane proposing approximately 7 million square feet of office / retail / industrial / institutional uses, plus 5 million square feet of residential development (4,434 residential units) and approximately 205 acres of open space and related infrastructure. This land use scenario includes an "Entertainment Variant", which

will also be addressed in the EIR. The Project Applicant's proposal, which could include the use of building-integrated wind turbines, is identified in the NOP as the Developer-Sponsored Project.

A Community Preferred Plan has also been proposed for the project site. This plan, which will be evaluated in the forthcoming Draft EIR at the same level of detail as the applicant's proposal described above, includes a "Recology Expansion Variant". The Community Preferred Plan includes up to approximately 8 million square feet of office / industrial / commercial / institutional space, no residential development and approximately 330 acres of open space.

In addition to the development scenarios and variants identified above, a Renewable Energy Alternative (which includes wind-turbines erected immediately upwind of the Candlestick Point Windsurfing Area) and a No-Project Alternative will also be evaluated in the forthcoming EIR.

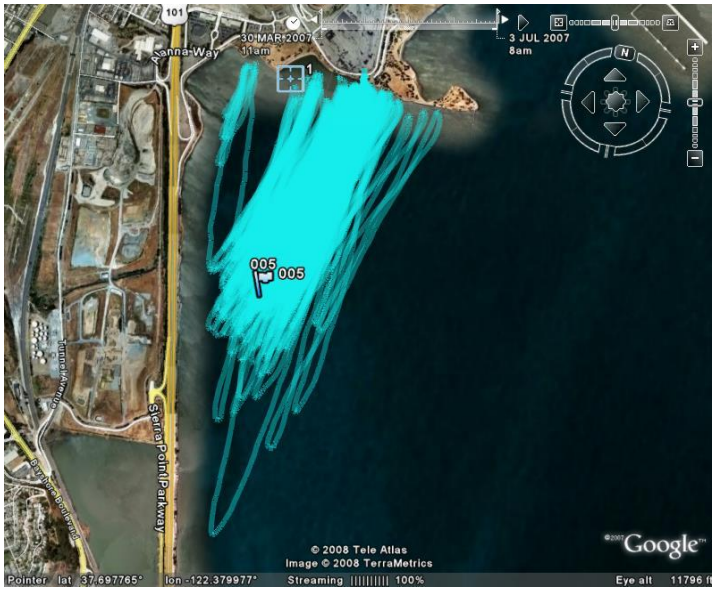
SFBA hereby requests that the EIR include appropriate studies and evaluations within the topics of "Air Quality" (alteration of existing air movement patterns) and "Recreation" (impacts on existing recreation resources), and consider the impacts that all structures proposed for the Baylands site may have on the windsurfing recreational use that takes place on the San Francisco Bay to the east of the Baylands site and Highway 101. Proposed buildings and/or wind turbines on the Baylands Project site could have a significant impact on the westerly winds that make Candlestick Point State Park and the waters south of the park a premiere windsurfing spot.

Existing Windsurfing Use

Candlestick Point State Park is one of the premier windsurfing spots in the Bay Area. It is one of the more favored locations for windsurfing and it is ideal for beginners and intermediates because there is very little swell or wave action to contend with as a result of the short distance between the upwind shoreline and the windsurfing area. In these flat-water conditions, beginner and intermediate windsurfers can develop skills that are hard to master in wavy and choppy waters, and advanced windsurfers have a less hectic environment in which to learn trick/freestyle moves. Candlestick Point Park is the only practical place for beginner and intermediate windsurfers to windsurf within the City and County of San Francisco. The three nearest alternate launch sites (Oyster Point - 3 miles, Crissy Field - 8 miles, Ocean Beach - 8 miles) are appropriate for advanced windsurfers only because of the on-water conditions... offshore winds, strong currents or heavy surf.

The launch area at Candlestick Point State Park is located approximately 100' SW of the parking circle at the south end of the Candlestick Point State Park parking lot. Windsurfers are most efficient traveling perpendicular to the wind, so the windsurfers sailing from the launch typically travel back and forth on tracks that run roughly SSW and NNE in the face of wind that typically comes from the WNW. When sailing at Candlestick Point, windsurfers generally try to stay well the west (closer to I-101 and the shoreline) to ensure that they can make it back to the launch point in the face off offshore winds, or if they lose mobility through decreased wind speeds, damaged equipment or injury; (in other words, to prevent from being blown out into the Bay towards Oakland/ Alameda and not being able to return to their launching point at Candlestick Point.)

The picture below is a series of GPS tracks (provided by a windsurfer who regularly uses the site) superimposed on an aerial view of the windsurfing area at Candlestick Pont and immediately downwind of the Baylands. A number of other windsurfers polled found these tracks to be representative of the primary sailing area, with the areas that are solid blue showing the most frequently used areas. At the southerly end of the sailing area, windsurfers approach within 500-1,000’ of the shoreline and generally get closer to the shoreline along Highway 101 as they move in a southerly direction.



Wind Impacts

Windsurfing generally requires strong and steady wind. As wind conditions become gustier, with greater variations in speed and direction, windsurfing becomes more difficult and less enjoyable as a recreational activity. Reduced wind velocity and increased turbulence are both factors that can affect wind conditions such that windsurfing becomes difficult or even impractical. Turbulent winds can also increase the risk of injury. If wind speeds are reduced greatly in the lulls, then the wind may not provide enough energy for windsurfers to keep a board planing on the surface of the water, resulting in very low sailing speeds, instability and falling into the water (similar to balancing on a bicycle with little, to no, forward movement).

During an impact analysis for an earlier project in Burlingame, wind tunnel analysis was used to look at potential impacts on wind velocity and turbulence. Information in the resulting environmental impact report (EIR) prepared by Charles Bennett of Environmental Science Associates (ESA) indicated that turbulent effect can travel 25-50 times the height of a solid obstruction. The experience of members of our windsurfing community confirms this rule. One notable case is the construction of a Marriott hotel in Aruba that has affected wind well offshore.

Beyond height, the width and the shape of a building or tower or other obstruction also can have an impact on how the passing wind is affected. In the case of wind turbines, the towers would likely have a nominal impact on the wind because they present a relatively narrow obstruction, while the blades could have a more significant impact because they are designed to capture energy from the wind as they convert wind velocity into blade speed. In the case of buildings, narrower and less angular buildings may allow the wind to recover more quickly and over shorter distances.

It is important that an analysis of wind impacts evaluate both changes in velocity and changes/increases in turbulence and/or turbulence intensity. A standard that examines wind by looking at average velocity only cannot distinguish between wind that is averaging 20 m.p.h. and gusting between 18-22 m.p.h. and wind that is averaging 20 m.p.h. and gusting from 5-35 m.p.h. While the measure of average velocity would see these wind conditions as identical, the first wind condition would be ideal for windsurfing while the second would make windsurfing impractical or impossible. Windsurfers can adjust to changes in wind speed by rigging a larger or smaller sail; however, windsurfers cannot adjust to changes in turbulence because each sail has a limited range within which it can function well.

SFBA strongly recommends performing wind tunnel analysis of your Alternatives with ESA acting as the consultant. The figure below identifies likely data points that could be used for that study.



The aerodynamic and hydrodynamic issues of windsurfing, and the complexities of how windsurfers are affected by the wind and other conditions, are both complex and to some degree site-specific. SFBA would be glad to work with you and any consultant who works on the preparation of the EIR in order to lend our knowledge and assist in developing any information that you feel would be helpful. Please do not hesitate to contact me, and I would appreciate being advised of any issue that might be of concern to our members. Please also add me to the project mailing list for the Baylands Specific Plan EIR and any other matters related to the Baylands Project:

SFBA
William Robberson, President
1230 Clay St. #203
San Francisco, CA 94108

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SFBA is also concerned about the cumulative impacts of the Baylands Project combined with impacts of other pending projects in the immediate area, including Bayview Hunters Point, Executive Park, and Visitation Valley Schlage – Locke. We are specifically interested in a comprehensive analysis of the combined projects on 1) traffic and transportation impacts, 2) air quality impacts, 3) visual impacts, 4) aesthetic impacts, 5) scenic impacts, 6) resources impacts, and 7) impacts on open space.

We look forward to an EIR that tests and improves the environmental performance of this ambitious project.

Sincerely,



William Robberson, President
San Francisco Boardsailing Association
(415) 307-7720
BillRobberson@sfba.org