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110-001.11-021

January 10, 2011

John Swiecki
City of Brisbane
50 Park Place
Brisbane, California 94005

RE: Notice of Preparation for the Brisbane Baylands Specific Plan EIR

Dear Mr. Swiecki:

Thank you for the opportunity to review and comment on the Notice of Preparation ("NOP") for the Brisbane Baylands Specific Plan EIR, dated December 10, 2010. The Brisbane Baylands project is of interest to the San Francisco Redevelopment Agency, as the project site adjoins the Visitacion Valley Redevelopment Project Area to the north and is close to the Bayview Hunters Point Redevelopment Project Area to the northeast. Further, there are a number of existing and planned transportation facilities that require close coordination between Brisbane and San Francisco, including Bayshore Boulevard, the SF Muni T-Third Light Rail Transit ("LRT"), the Caltrain Bayshore station, the extension of Geneva Avenue, and the Candlestick Shipyard Bus Rapid Transit ("BRT") service. Following are our comments regarding the preparation of the EIR.

Cumulative Impacts

The NOP states that the EIR will include assessment of two scenarios, the Developer-Sponsored Project and the Community-Preferred Plan, presumably at an equal level of review. The Developer-Sponsored Project will have an Entertainment Variant with a 1,111,800 sq. ft. entertainment district that includes an arena, a theater, a multiplex, and a conference/exhibition space. The Community-Preferred Plan includes a 611,300 sq. ft. entertainment district. The EIR should include an assessment of the potential cumulative impacts of either entertainment district in combination with the planned arena and entertainment uses in the Candlestick Point Hunters Point Shipyard Phase II project and the existing Cow Palace in the City of Daly City.

Both the Developer-Sponsored Project and the Entertainment Variant includes 4,434 residential units. Accordingly, the EIR should include an assessment of the potential cumulative impacts of planned residential development on the project site in combination with planned and existing

residential uses in neighboring areas, including Visitacion Valley, Executive Park, and the Candlestick Point Hunters Point Shipyard Phase II project.

Transportation

Since the Brisbane Baylands and Visitacion Valley share a number of existing transportation facilities, the EIR should study impacts on these roadways, such as Bayshore Boulevard, Tunnel Road, U.S. Highway 101 and its access points, and the planned improvement of Geneva Avenue and Harney Way.

Due to the convergence of the future expansion of the T-Third LRT into the Brisbane Baylands, the enhancement of Caltrain service at the Bayshore station, and the planned connection of the Candlestick Shipyard BRT with the T-Third LRT and Caltrain at an intermodal Bayshore station, and the extension of BRT service to the Balboa Park BART Station via Geneva Avenue, the EIR should provide comprehensive coverage of the impacts of the project on these planned transit improvements. This analysis should include impacts based on increased ridership and impacts related to roadway congestion.

The EIR should also study the effects of the scenarios and variants on the transportation mode share for new trips created by the development, particularly in light of the planned transit improvements. In addition, the EIR should analyze traffic and transit impacts at an intermediate phase of the project, relative to the timing of planned project and regional transportation improvements.

The NOP describes public trails and pedestrian connections to future open space and public use areas under both the Developer-Sponsored Project and the Community-Preferred Plan. However, the figure provided in the NOP for the Developer-Sponsored Project (Figure 10) does not show clear connections from sidewalk areas in the development area to the trails in the open space area. The proposed Bay Trail is also not shown. These pedestrian connections are important for future residents of the residential areas of the Schlage Lock factory site directly north of the project site in Visitacion Valley, as well as for future residents of the Developer-Sponsored Project, and should be assessed in the EIR.

Further Comments on Planned Transportation Improvements

Both the Developer-Sponsored Project and the Community-Preferred Plan assume significant transportation infrastructure improvements that would be secured through the San Francisco County Transportation Authority's Bi-County Transportation Study process for southeastern San Francisco County and northeastern San Mateo County. The planned regional transportation improvements include an upgrade to the Bayshore Caltrain station, the extension of Geneva Avenue and the T-Third LRT, and the introduction of BRT through or adjacent to the project site. Separately, the San Francisco County Transportation Authority's Bayshore Station Study

includes evaluation of three alternative locations for the intermodal Caltrain Station. This EIR should include an assessment of the impacts of each location on local traffic and circulation.

Notwithstanding the aforementioned Bayshore Station Study, the City of San Francisco has completed planning for transit-oriented development around the existing Bayshore Caltrain Station, including the approved plans for the Candlestick Point Hunters Point Shipyard Phase II and Executive Park development projects and the Visitacion Valley Redevelopment Project. The projects have been designed to promote transit usage and walking over single-occupancy vehicle trips. We are concerned that the efficacy of these efforts and the significant investment in transit-oriented development that has been made to date will be undermined by moving the station platform and transit facilities further south. It is therefore imperative to the Redevelopment Agency and the City of San Francisco that, in order to ensure feasibility and funding for these transportation improvements, both Counties are able to commit to a land use proposal containing a mix of commercial and housing uses near transit. In particular, many federal and state grants and loans dedicated to funding transit infrastructure require that housing be located within a quarter or half-mile of the transportation improvements. In evaluating the project scenarios and variants, the EIR should consider the availability of funds for transit and infrastructure improvements as well as the likely need to comply with government grant and loan programs to implement them.

Specific Comments for the Transportation Analysis. Following are specific comments for the EIR transportation analysis.

- No assumption should be made that moving the T-Third LRT extension from its current terminal to a southern-shifted Caltrain station will be supported by San Francisco, especially since finding the funds to support the more limited extension of the T-Third to the Bayshore Station as currently envisioned is already a challenge. The T-Third is an integral part of the Bayshore Station intermodal project, as is the BRT. The immediacy of transfers from Caltrain to the T-Third to BRT is an absolute must in Bi-County Transportation Study assumptions.

- While the Candlestick Point Hunters Point Shipyard Phase II project based its mode spilt and circulation analysis on immediacy of the transfers noted above, other key San Francisco developments (Visitacion Valley, Executive Park) based their TOD narratives and assumptions on the fact that Caltrain would remain within immediate walking distance from these projects. The cumulative traffic impacts should reflect diminished transit usage that would result from moving the Caltrain station to the south.

- The BRT line need not be aligned to Geneva Avenue along the entire length of the extension. It is far more important for the BRT to serve Caltrain and the T-Third LRT directly than to precisely follow the Geneva extension alignment. It is also important to distinguish the main functions of BRT (rapid, direct transit access between the intermodal and high-density mixed-use destinations, with well-spaced stops limited to TOD-

supportive sites) from the automobile and truck vehicle function of extending Geneva Avenue through the freeway interchange. Given the "sweep" of the proposed Geneva Extension well south of the Bayshore Station, the analysis should consider alternative concepts that recognize this distinction, such as separating the BRT from Geneva Avenue on the east side of the Caltrain tracks, as well as establishing a BRT alignment on or parallel to local streets north of Geneva Avenue.

- BRT frequencies and its need for exclusive, pre-empted operation through the vicinity of Caltrain may pose access and circulation problems if BRT is integrated with the Geneva Extension, particularly if there would be a great need for truck traffic to cross the BRT alignment to reach the Recology site. The analysis should evaluate the service speed and reliability and the overall efficacy of BRT and should consider project variants that maximize the efficacy of the transit system.

- The bicycle network – including the Bay Trail – should avoid crossing the Geneva Extension at grade, and avoid all surface interactions with the proposed freeway interchange at U.S. Highway 101 and Geneva Avenue/Harney Way. These bicycle links should also make a direct connection to Caltrain and the BRT.

- East-West pedestrian connections that are safe, convenient and offer direct access to the Bayshore Intermodal Station from surrounding mixed-use neighborhoods do not appear to be well-developed, particularly with respect to the volumes and typed of traffic proposed on the Geneva Extension.

Figure-by-Figure Comments. Following are specific comments on the figures in the NOP.

- Figures 4-6: The Land Use variants should show transit, intermodal and BRT stations. Without these, it is difficult to gauge or evaluate the viability or integrity of TOD potential that would eventually be critical for planning discussions and future funding potentials.

- Figure 9: The diagram should show the proposed BRT stops at the Bayshore Intermodal Station and along Bayshore Boulevard and Geneva Avenue.

- Figure 10: The Bay Trail should connect to the Caltrain and BRT hub, and should not be forced onto a surface crossing at Geneva Avenue (which is a bike safety concern). Securing grade-separated bicycle crossings of Geneva and freeway on- and off-ramps should be considered in all Bay Trail, circulation and land use variants.

- Figure 11: The diagram should show how vehicles would reach Bayshore BRT/Caltrain hub, with a legend key for shuttles, taxis, and cars.

- Figure 12: The diagram should not show an extension of the T-Third LRT farther south than currently proposed by the San Francisco Municipal Transportation Agency. It should show the proposed BRT stations. The red dotted line has no explanation in the legend – is this Samtrans?

- Figure 13: The bicycle diagrams raise the following concerns: no access is shown to the BRT/Caltrain hub for the Bay Trail, no separation is provided for bikes from truck traffic on Geneva Avenue, and BRT stations (which are important for bicycle/transit transfers) are not shown.

- Figure 14: This diagram is missing the BRT alignment and the proposed BRT stations.

Air Quality and Noise

The EIR should include an analysis of potential increases in air pollutants and noise at intersections, such as Bayshore Boulevard at Sunnydale Avenue and Bayshore at Leland Avenue, that are near sensitive receptors, including existing residential neighborhoods in Visitacion Valley as well as the planned development on the Schlage Lock factory site.

Aesthetics

The EIR should consider views of the new development under the Developer-Sponsored Project and the Community-Preferred Plan from existing neighborhoods in Visitacion Valley, a regional view from McLaren Park or Bayview Hill, and views of the new development from the planned future development on the Schlage Lock factory site located directly north of the project site, and the Sunnydale Housing project to the northwest.

Archaeological Resources

The EIR should include an archaeological consultant-prepared assessment of prehistoric and historic archaeological resources. The February 22, 2006 Initial Study for the Brisbane Baylands Phase I Specific Plan stated that "there are no prehistoric archaeological resources in the project area, because the site is part of a landform that was created by artificial fill in historical times" (page 9 of the Initial Study). However, although more than half of the project site is identified as landfill (see Figure 3 of the NOP), that portion of the site west of the Caltrain/Union Pacific tracks is not identified as a landfill area. The historic shoreline extended inland westward from San Francisco Bay to the Caltrain tracks. The historic Bay shoreline with its many small embayments and lagoons extending from Hunters Point to the San Francisco Airport was well populated prehistorically with both large and small shell midden communities and is today archaeologically sensitive for prehistoric sites. Within the project site, the historic shoreline area includes Icehouse Hill (the "prominent hill" on page 3 of the NOP) and has a probability of containing prehistoric archaeological sites, particularly since prehistoric archaeological sites have been discovered just outside the project boundaries in Brisbane, including a midden site

near the US Postal Office center west of Bayshore Boulevard (CA-SMA-356), and the San Bruno Shellmound (SMA-40). Nearby in San Francisco north of the project site, there are two midden deposits on the Schlage Lock factory site and archaeological sites at other locations in the vicinity, including the Burnett Shellmound (CA-SFR-34) and the Johnson Landing Mound (CA-SFR-7). Two of these sites, CA-SMA-40 and CA-SFR-7 have been determined to be eligible for the National Register of Historic Places. Further, there are known historic archaeological sites in this vicinity, including a historic dairy farm site near Main Street that was discovered during the environmental review of PG&E's Jefferson-Martin Transmission Line Project (CA-SMA-326H) and the historic Union Pacific Silk Manufacturing Company site on the Schlage Lock factory site.

Regarding the landfill area, land forms that historically were or currently covered by Bay waters were occupied by prehistoric populations. From time to time, archaeological evidence of such occupation is uncovered. In the late 1980s a prehistoric human burial dated to 4255 years before the present was recovered in the Coyote Point Marina in San Mateo County approximately 12 feet below the water surface. Also prehistoric human remains were encountered in sediments in the Bay bottom during creation of Treasure Island. Consequently, the assertion that future development within the Specific Plan would not affect prehistoric resources because it is filled land beyond the historic shoreline, is incorrect.

Water/Wastewater Issues

The EIR should study the effects of the development of the Brisbane Baylands on the wastewater treatment system, particularly as it may affect Visitacion Valley and other neighborhoods in southeastern San Francisco. The EIR should evaluate an alternative whereby the Schlage Lock development and the Brisbane Baylands development share a surface stormwater treatment and conveyance system, as described in multiple planning documents.

The 2006 Initial Study stated that flooding was not a concern in the project site as no residential uses were proposed. However, as the Developer-Sponsored Project includes 4,434 residential units, assessment of the risk of flooding and mudflows should be included in the EIR. Notably, the Developer-Sponsored Project may require expansion of Brisbane's sandbag program, currently operating from the Corporation Yard at 1020 Tunnel Avenue.

Recology Variant

The Recology Variant as described in the NOP (page 10) seems to be a proposed 24-acre expansion of the existing 49-acre Recology facility. This appears to be a project in itself and separate from the Developer-Sponsored Project and the Community-Preferred Plan. While CEQA environmental review can be included in the Brisbane Baylands EIR given its location, the EIR should clarify whether environmental review of the Recology expansion project is at a project-level or at a program-level. Further, it would appear that the Recology Variant would be a variant of both the Developer-Sponsored Project and the Community-Preferred Plan since the

expansion project does not appear to be sponsored by the community and only 24 acres of either scenario would be directly affected. It would be of interest to see what modification of the Developer-Sponsored Project would be necessary to accommodate the additional 71,000 sq. ft. of development for the Recology expansion project.

Renewable Energy Alternative

The Renewable Energy Land Use Alternative appears to be the alternative presented by Energy Solutions in *Preliminary Renewable Energy Feasibility Study: Analysis of the Baylands Renewable Energy Alternative* (Energy Solutions, October 18, 2010). It may be useful to consider how application of the renewable energy concepts for the solar farm and wind turbines could be applied to both the Developer-Sponsored Project and the Community-Preferred Plan; i.e., alternatives that modify the two scenarios under consideration, rather than presenting a completely different alternative that would require further study by the developer and the community if the City Council were inclined to seriously consider this alternative.

Further, the Renewable Energy Land Use Alternative appears to have "environmental constraints" as identified by Energy Solutions, including glare and wildlife concerns for the solar farms (page 6 of the *Preliminary Renewable Energy Feasibility Study*) and noise, visual, and wildlife concerns for the wind turbines (pages 9, 10 of the *Preliminary Renewable Energy Feasibility Study*). The EIR should assess these aspects of the Renewable Energy Land Use Alternative.

Again, thank you for the opportunity to review and comment on the NOP. Please feel free to call me at 415-749-2577 or send an email to Stanley.Muraoka@sfgov.org should you have any questions.

Sincerely,

Stanley Muraoka
Environmental Review Officer

cc: Amy Neches
Stephen Maduli-Williams
Kelley Kahn