SAN FRANCISCO BAYKEEPER®

May 12, 2009

Mr. Kraig Tambornini, Senior Planner
City of San Rafael, Community Development
PO Box 151560
San Rafael, CA 94915-1560

Sent via electronic mail to kraig.tambornini@cityofsanrafael.org

RE: San Rafael Airport Recreational Facility Draft Environmental Impact Report

Dear Mr. Tambornini,

We are writing on behalf of San Francisco Baykeeper ("Baykeeper") to express our concerns about impacts that the proposed San Rafael Airport Recreational Facility ("Project") will have on the water quality and hydrology of Gallinas Creek and the San Francisco Bay. Baykeeper is local nonprofit organization dedicated to protecting and improving the water quality of San Francisco Bay. For more than two decades we have worked to reduce the pollution reaching our Bay and creeks through a combination of advocacy, science and litigation.

The proposed Project will convert low-lying, undeveloped land in a floodplain into acres of impervious parking lots and roofs. In light of the projected climate change-related sea level rise in the Bay Area, it is undesirable and arguably foolish to develop any Bay margin lands, especially those that are already flood-prone and surrounded by levees. We recognize, however, that the purpose of the California Environmental Quality Act ("CEQA") is merely to ensure that environmental impacts are considered, not to prevent unsound decision-making. Our comments today, therefore, focus on the draft Environmental Impact Report's ("EIR's") failure to adequately describe the Project's impacts on hydrology and measures to mitigate these impacts.

Stormwater runoff from impervious surfaces is the largest source of pollution reaching San Francisco Bay and Bay Area creeks. In developed landscapes, pavement, roofs, and compacted soils prevent rainfall from soaking into the ground. As the amount of impervious surface increases in a watershed, so does the amount of nonpoint source pollution (e.g., pesticides, fertilizers, oil, etc.) reaching local waterbodies. The increase in runoff also increases creek flow, volume and velocity, which destroys habitat by eroding banks and scouring creekbeds. A related, but sometimes overlooked, impact is reduced year-round flow in creeks. Impervious surface prevents rainfall from recharging groundwater, which keeps many Bay Area creeks flowing year-round. Studies show that increasing the amount of impervious surface area in a watershed beyond even ten percent routinely leads to impairment of water quality and to biological communities.[1]

Gallinas Creek has been designated by the San Francisco Bay Regional Water Quality Control Board ("Regional Board") as supporting many important beneficial uses, including the

[1] http://crd.dnr.state.ga.us/assets/documents/jrgcrddnr/ImperviousLitReview_Final.pdf

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www.baykeeper.org

785 Market Street, Suite 850
San Francisco, CA 94103
Tel (415) 856-0444
Fax (415) 856-0443

- Excessive Runoff,[6] and
- Otherwise Substantially Degrade Water Quality.[7]

Specifically, in finding that there will be no significant impact, the EIR relies on the hydrology study's conclusions that, post-development, only 19% of the site will be impervious surface, and that, therefore, the runoff coefficient will increase less than 4%. These conclusions are misleading because the hydrology study assumes that the Project site consists of the entire airport site located within the levees, which is 106 acres. In truth, the Project site is only 9.1 acres, 4.6 acres of which will be converted to impervious surface. The table below shows the substantial difference that this assumption makes in terms of calculating the increase in percentage of impervious surface, and the increase in the runoff coefficient.

Project Site Area	106 acres	9.1 acres
Current Impervious Surface	16 acres	0 acres
Current Runoff Coefficient	0.56	0.5
Post-Development Impervious Surface	20.6 acres	4.6 acres
Post-Development Runoff Coefficient	0.58	0.7
Percent of Imp. Surface	19%	51%
Percent Increase Runoff Coefficient	3.6%	40%

Defining the Project site to include land that will not be part of the actual development would undermine the fundamental purpose of CEQA, which is to inform the public and decision-makers of significant environmental impacts. As can be seen in this scenario, this "piecemealing" allows a finding of no significant impact even when the development would dramatically change the landscape. Carried to its logical conclusion, this type of analysis could allow the entire airport site, or even the entire watershed, to be paved with no finding of significant impacts. In short, the EIR's finding of no significant impacts for the thresholds listed above is wrong because the hydrology analysis upon which this finding is based should consider only the Project site, and not the airport site as a whole.

We further note that the EIR's discussion of whether there will be significant impacts in terms of "excessive runoff" and "alteration of drainage pattern resulting in erosion and siltation" is misleading. As written the EIR considers the impacts of the Project on the site's existing drainage system, whereas it should consider the impact of the Project on Gallinas Creek. As is discussed in the preceding section, the EIR must discuss whether and to what extent the frequency and volume of discharges to Gallinas Creek will increase and the resulting impacts.

[6] EIR at 11-28.
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Appendix 1: Low Impact Development Resources

A growing number of communities are finding success using Low Impact Development (LID) strategies to reduce stormwater pollution. As a result, there are many resources available to help municipal staff and officials understand what LID is, and how it can be implemented in their communities. Below, San Francisco Baykeeper offers a selection of LID resources.

General Overview of LID

- The United States Environmental Protection Agency Nonpoint Source Pollution Program has a wide range of LID related information. http://www.epa.gov/nps/lid/
- The Low Impact Development Center provides general and technical information for cities, planners, and developers. The San Luis Obispo SloGreen Build Organization has compiled a document outlining some of the technical and economic aspects of LID including its application in the context of the San Lois Obispo watershed. http://www.lowimpactdevelopment.org/ http://slogreenbuild.org/Library/documents/general/LID_greenpaper_9_2008.pdf
- The Surfrider Foundation advocates for LID as a way to protect the nation's beaches from stormwater pollution. http://www.surfrider.org/a-z/lid.php

State Level Guidance and Information on LID

- The California Stormwater Quality Association (CASQA) Handbook for New Development and Redevelopment reflects the current practices, standards, and knowledge about the effectiveness of LID best management practices. http://www.cabmphandbooks.com/Development.asp

LID Resources from Some Bay Area Counties Stormwater Programs

- The Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) http://www.scvurppp-w2k.com/guidance_tools.htm
- The Alameda Countywide Clean Water Program (ACCWP) http://www.cleanwaterprogram.org/businesses_developers.htm
- The Contra Costa Clean Water Program (CCCWP) http://www.cccleanwater.org/new-developmente3/technical-reports-and-design-guidance/

Examples of LID Design Guidelines and manuals from Bay Area Cities

- San Francisco Stormwater Design Guidelines created by the Port of San Francisco and the San Francisco Public Utilities Commission – outlines a design process for incorporating LID BMPs into site design. http://sfwater.org/detail.cfm/MC_ID/14/MSC_ID/361/MTO_ID/543/C_ID/4406
- The City of San Francisco's Better Streets Plan incorporates LID principles into the City's long term planning for its streets. http://www.sfgov.org/site/uploadedfiles/planning/Citywide/Better_Streets/index.htm
- The City/County Association of Governments of San Mateo County Sustainable Green Streets and Parking Lots Design Guidebook provides state-of-the-art information on creating low-impact development roadways and parking lots within San Mateo County. http://www.flowstobay.org/documents/municipalities/sustainable%20streets/San%20Mateo%20Guidebook.pdf
- The Bay Area Stormwater Management Agencies design guidance manual, Start at the Source provides guidance on how to incorporate LID into site design. http://www.sanjoseca.gov/planning/stormwater/startatsource.pdf

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